

Hewlett-Packard Company (HP)

On behalf of Hewlett-Packard Company (HP), I am writing the U.S. Environmental Protection Agency (EPA) ENERGY STAR Office to provide comments on the ENERGY STAR® Program requirements for Single Voltage External AC-DC and AC-AC Power Supplies (Draft 4 Eligibility Criteria).

HP has already commented several times on the technical aspects of the rules since draft 1. Our remaining comments concern the product marking protocols.

- HP understands and agrees that product markings to indicate qualification to the ENERGY STAR program should not be placed on the external power supply (EPS) itself.
- HP understands the EPA is considering development of a new logo which includes a statement in English that would need to be placed on the packaging of end-use products using ENERGY STAR qualified EPS. The addition of a statement in English will likely require translation into local languages going into non-English speaking countries. This would tend to dilute the impact of the ENERGY STAR brand, require significantly more room on the packaging, and create more complexity for manufactures shipping their products worldwide. HP recommends the EPA identify the use of a qualified EPS strictly through use of a new logo, and do not include any statements which would need to accompany a new logo.

The EPA needs to determine how product marking for end-use products should be implemented. In the case of products which can qualify to ENERGY STAR (printers, computers, etc.), HP recommends those products not be allowed to begin marking to the new rules until the MOUs for those products have been officially updated to include requirements to meet the EPS rules. For products not covered by the ENERGY STAR program, it would seem reasonable to allow them to begin marking to the new rules as of the start of the new EPS program (January 1, 2005).