# JEITA's Comments on "ENERGY STAR® Program Requirements for Computers Version 5.0 DRAFT 1"

JEITA International Energy Star Committee (PC group)

## 1 Eannual

- Eannual is a new technique but cannot be discussed appropriately because detailed information has
  not been presented about the EEPA tool and sample data. To enable appropriate discussion of
  standards, we request early presentation of information.
- The V5 standard only stipulates annual power consumption by Eannual, but should be planned by considering various merchandises (product categories) for different user needs.
- The V5 standard is to be reviewed two years after enforcement but may become an absolute value standard of always 25% if the product lifecycle is considered. If the standard is planned and enforced without enough discussion, the versatility of merchandise may be lost.
  - For preferable competition on energy conservation in the industrial sector, appropriate discussion is required.

## 2 The Eannual standard

- The Eannual standard should be different for business and home computers.
- We are concerned that the EEPA tool may not be able to control the display power consumption (monitor off) correctly.
  - If the monitor of a notebook computer or desktop computer with built-in monitor cannot be turned off, the power consumption depends on the screen size. Do the EEPA tool and the standard assume that this concern can be eliminated?
- Since Eannual varies depending on the power consumption of a TV tuner, HDD, and built-in components, additional power requirements should be considered.

### 3 Power management requirements

- JEITA still does not understand the effect of reducing annual power consumption by network power management.
  - Since 96% of Japanese users shut down or put their computers in standby after use, the increased standby power consumption due to the WOL function makes it difficult to understand the importance of network power management requested by the EPA.
  - Therefore, we consider the network power management requirements should be coordinated with the ENERGY STAR management authorities of each country.
- Regarding "IEEE 802.3az Energy Efficient Ethernet," the standard determination timing and the
  possible shipping timing do not seem to match the V5 enforcement timing. It would appear too early
  to include this item and so we request that it be deleted.
  - The description of a future specific technical trend should be a reference or recommended item.

#### 4 The EEPA tool

- No information has been presented about measuring instruments (wattmeter, etc.) for the EEPA tool. To ensure smooth data collection in June, we request early presentation of information.
- JEITA member companies know from experience that benchmark software does not operate normally
  or the reproducibility is low under some operating system. When implementing and applying the
  EEPA tool, full prior verification is necessary.
- The proposed measuring method necessitates a network function (wired LAN) and a computer with no cable needs an option card or other means. Since this does not comply with the shipping configuration, please make an appropriate proposal.

## 5 Other

• To help clarify and review the ideas of the EPA and differences between the old and new standards accurately without misunderstanding, the EPA should list differences between the new standard (V5) and the current one (V4), and give clear reasons for the differences.