

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



OFFICE OF  
AIR AND RADIATION

November 20, 2007

Dear ENERGY STAR<sup>®</sup> Computer Partner or Other Interested Stakeholder:

This memorandum details a concern raised to ENERGY STAR regarding qualification of families of Computers, confirms the intention of the product family portion of the Version 4.0 Computer Specification, and describes next steps for ENERGY STAR Computer Partners in verifying that families of products are being qualified with ENERGY STAR as intended. EPA issues this memorandum as a reminder about product families and how EPA and ENERGY STAR Computer Partners can work together to maintain trust in the ENERGY STAR brand while minimizing administrative burden on Partners.

### **Concern Regarding Qualifying Families of Products**

ENERGY STAR has been alerted that some partners may be qualifying an entire product family using a model other than the highest energy consuming model. If applicable, numerous models or configurations within a family may be qualified as ENERGY STAR when they can not meet the 4.0 requirements.

The ENERGY STAR Program Requirements for Computers, Section 4C ("Qualifying Families of Products" – page 14) reads:

- A. *Qualifying Families of Products: Models that are unchanged or that differ only in finish from those sold in a previous year may remain qualified without the submission of new test data assuming the specification remains unchanged. If a product model is offered in the market in multiple configurations or styles, as a product "family" or series, the partner may report and qualify the product under a single model number, as long as all of the models within that family or series meet either of the following requirements:*
- *Computers that are built on the same platform and are identical in every respect except for housing and color may be qualified through submission of test data for a single, representative model.*
  - *If a product model is offered in the market in multiple configurations, the partner may report and qualify the product under a single model number that represents the highest power configuration available in the family, rather than reporting each and every individual model in the family. In this case, the highest configuration would consist of: the highest power processor, the maximum memory configuration, the highest power GPU, etc. For desktop systems which meet the definition for multiple desktop categories (as defined in section 3.A.2) depending on the specific configuration, manufacturers will have to submit the highest power configuration for each category under which they would like the system to qualify. For example, a system that could be*

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*configured either as a Category A or a Category B desktop would require a submittal of the highest power configuration for both categories in order to qualify as ENERGY STAR. If a product could be configured to meet all three categories, it would then have to submit data for the highest power configuration in all categories. Manufacturers will be held accountable for any efficiency claims made about all other models in the family, including those not tested or for which data was not reported.*

## **Purpose of Section 4C**

As stated in Draft 3 of the Version 4.0 Computer Specification, the purpose of Section 4C is to reduce manufacturer reporting burden while ensuring all configurations of a given model meet the specification. At that time, EPA made clear that for desktops, to ensure that products meet the specification under all configurations, that manufacturers needed to submit data for the highest configuration for each category (e.g., A, B, and/or C) in which they want to qualify in the desktop space. Similar guidelines apply for notebook computers.

## **Next Steps in Verifying that Families of Products are Being Qualified as Intended**

EPA is taking this concern regarding family qualifications very seriously and trusts that partners will as well. We are jointly responsible for the integrity of the ENERGY STAR mark and its value to purchasers, other governments, and programs like EPEAT. With this in mind, we ask that all partners who have qualified families of Computers under Version 4.0 review their qualified products and ensure that they used the highest energy consuming configuration in a product family when qualifying that family.

**If upon reading this clarification you believe that you may have incorrectly qualified a Computer model or family, please inform EPA immediately by sending a notification via email to [Computers@icfi.com](mailto:Computers@icfi.com).** EPA will work with manufacturers on a case-by-case basis to determine next steps with regards to correcting misrepresented qualified products.

EPA will also review family data submitted through our On-Line Product Submittal tool and contact partners who have qualified families of products to discuss the qualification of these families. Thank you for your attention to this important matter.

Best regards,



Katharine Kaplan, EPA Product Manager  
ENERGY STAR for Office Equipment