June 13, 2008

Mr. Andrew Fanara
Energy Star Product Development Team Leader
United States Environmental Protection Agency
Washington, DC 20460

RE: Energy Star Program Requirements for Computer Servers, Draft 1

Dear Mr. Fanara:

Elpac Power Systems has the following comments on Draft 1 of the Power Requirements for Computer Servers.

Section 1, Definitions
Item B. Computer Server Power Supply:
Elpac Power Systems would like to recommend the inclusion of DC-to-DC power supplies in the requirements. The conversion of energy into these servers is either managed by AC-to-DC or DC-to-DC supplies. The power supplies conversion efficiency is critical to the performance and energy savings that the Energy Star program is trying to promote. Excluding DC power supplies limits the effectiveness of the Energy Star Program, especially as DC-to-DC supplies can offer more efficiency and therefore, more power savings.

Section 2, Qualifying Products
Note: (to DC power supplies):
In response to this section, we would like to note the following:
1. DC powered server solutions are widely common offerings today, with solutions from these leading server manufacturers in the marketplace: Dell, HP, IBM, Rackable, Sun, etc.
2. There are industry standards available today for connecting DC power supplies to servers. -48V DC is common in the telecommunications market and is used in a wide variety of systems.
3. We believe there is straight forward method of determining efficiency in the marketplace: Basically output power over input power. This is regardless of an industry standard or an AC or DC supply.

Thank you for allowing us to comment on the Power Requirements for Computer Servers. We feel the inclusion of DC-to-DC power supplies will significantly improve Energy Star specification.

Sincerely,

Stuart Oakes, General Manager
Elpac Power Systems