Rebecca,

Thanks for the opportunity for input to the Draft 4 spec. Our input is the following:

I'm not sure if Nortel has DC-powered compute "Servers" but we certainly wish the EPA to know that DC-powered telecom equipment is not typically -48VDC (that's a battery float voltage when the power fails). When AC-power to the rectifiers is on, -53V +/-1V is much more typical. It doesn't make a huge difference in power (its just increased current to compensate), but we do wish to measure and publish any typical energy consumption under typical conditions.

The actual float voltage (the voltage presented to the battery when the rectifier system is carrying the load) used in the battery system is totally dependant on the battery technology deployed. There are 6-7 different types of battery systems. This variety of battery systems results in float voltages that vary between -51.75 VDC and -54.00 VDC at the battery terminals.

If you have any questions, please feel free to contact me.

Thanks. Rick Dipper Corporate Responsibility Nortel