

Partner Commitments

3. Ensure that any model associated with the ENERGY STAR name or mark meets the following standards:

We consider that Energy Star program should not include toxicity and recyclability requirements as criteria for the reasons below:

- Many states of the United States of America are addressing/discussing how to control toxic materials. Enactment of multiple similar standards will confuse users and cause an unnecessary increase in the social cost.
- For recyclability requirements, existing EPEAT program is functioning effectively, and is being accepted widely. Introduction of a similar standard, again, may confuse users and lead to an unnecessary increase in the social cost.

6.1.1 About Labeling

In case Slate computing devices are chosen as a target, it's difficult to satisfy requirements.

Top or Front of Slate computing devices is Touch Screen Display, and is a user's access area.

Therefore, it's difficult to stick labels there, even if it is temporary.

About electronic labeling, displaying "for a minimum of 5 seconds" is difficult because the start-up time of Computer is designed very short.

In these reasons, for the battery operation product, "labeling to Bottom" or "electronic labeling time should be changed at minimum 0.5s" should be permitted.

Eligibility Criteria

Line 253 2.2 Excluded Products

Generally Handheld Computers (including eReaders) and Smart Phones are using the same architecture as Slate Computing Devices.

Hence it is difficult to classify Slate computing devices and Handheld Computers clearly.

We understand that EPA focusing eligibility criteria on battery charging efficiency of Slate Computing Devices.

However, EPA should argue similarly for both Slate Computing Devices and all battery operation apparatus.

Therefore, it is not a best policy to argue in ENERGY STAR Computer, about eligibility criteria of battery charging efficiency on Slate Computing Devices.

Regarding battery charging efficiency, you should argue separately.

EPA should regard Handheld Computers (including Slate Computing Devices) as Excluded Products in ENERGY STAR Computer.

About the products "without Cable LAN" in Notebook Computer (Tablet Computer) category, those are designed mainly operating by battery (like Slate Computing Device), and those do not count upon the prolonged use by ac mains power source. In this reason, for the products without Cable LAN, you should consider as Excluded Products (standard of or Battery Charger System) like Slate Computing Device.

Line 359 Table 3: Categorization of Desktop and Integrated Desktop Computers

By the proposal, both Desktop which uses the standard Notebook architecture, and Desktop which uses the Desktop architecture are contained in the same category.

Generally, the architecture for Notebook and that for Desktop have a difference in the CPU performance. Therefore, we request to apply the new categorization proposed by ITI.

Line 362 Table 4: Categorization of Notebook Computers

By the proposal, both Notebook using lower energy consumption architecture, and standard Notebook are contained in the same category.

The lower energy consumption architecture has the lower CPU performance compared to standard's. Therefore, we request to apply the new categorization proposed by ITI, like Desktop case described above. If this request is not acceptable, we request following changes since some ambiguous portions exist.

About categories NB0 and NB1 :

1. You should specify that NB0 and NB1 are for all the Notebook computers which do not fill the definition of NB 2, 3, and 4.
2. CPU Cores, Channels of Memory, and Screen Size should be deleted.

Also in order to avoid confusion, it's desirable for NB0 and NB1 to be combined into one category.

Line 388 Calculation about special Notebook

In the case of Tablet Computer using Smart Phone architecture, it does not have clear "Sleep mode" which satisfied with the definitions, Sleep mode and Long Idle mode.

For such products, the following word additions are required like Desktop Computer.

- For Notebook Computers that lack a discrete System Sleep Mode but have a Long Idle State power level less than or equal to 2.0 W, power in Long Idle (PLONG_IDLE) may be used in place of power in Sleep (PSLEEP) in Equation 1. In such instances, the second term of Equation 1, $(PSLEEP * TSLEEP)$, is replaced by $(PLONG_IDLE * TSLEEP)$; Equation 1 remains otherwise unchanged.

Line 437 Table 9: Function Adders TECGRAPHICS

In Notebook, Discrete GPU product can realize the power consumption equivalent to Integrated GPU, because Switchable Graphics function is common in general.

The qualification of ENERGY STAR should be given only for high energy efficiency product. But if Graphics Adder EPA proposed is used, low energy efficiency products can comply with ENERGY STAR.

Therefore, Graphics Adder for Notebook should be deleted.

Adders for Desktop are too large.

If performance of GPU (FB_BW) for Notebook and Desktop is the same, power consumption should also almost be the same.

The expression (Notebook is 38% of Desktop) which EPA uses by Data Analysis is not right.

Guessing from the Idle power consumption, Notebook Adders are in appropriate level and that of Desktop should be in the same level as Notebook's.

Line 621

You should delete the description after "If a Partner".

In family products, a partner must test in the highest power configuration.

In the third party certification process, the certification body gives qualification with judging that the test configuration is the highest power composition.

But including non-qualifying configuration means that the test / certification are achieved with non-highest power configuration, therefore it is contradictory to the demand matter.

When including non-qualifying configuration, the partner should submit qualifying highest power configuration test report, non-qualifying configuration list and those test reports to certification body.

But usually, such correspondence is difficult. In these reasons, the description after "If a Partner" should be deleted.

(Or, you should specify the following statement.

“When non-qualifying configuration is included in qualified models, the partner should submit qualifying highest power configuration test report, non-qualifying configuration list and those test reports to certification body.”)