

Comments on the EPA's Final Draft ENERGY STAR Version 1.0 Computer Server specification, April 2009

General comments:

While it's encouraging for us to see a number of our comments on the previous draft reflected here, it is very disappointing to see that blade servers have now been excluded, although we understand the reasoning behind this. However, blade servers form a large part of our server assets, and inclusion of these in future versions of the specification would be a key requirement for us using ENERGY STAR as a standard rating system.

We are also still of the opinion that "power consumption at idle" is not a useful measure of the power efficiency of a server, that we contend that servers are not designed and should not be designed to be most efficient at idle, and that we would rather see some other measure of "efficiency", such as performance per Watt. We hope such a measure will be included in future versions of the specification.

In general however, we fully support the development of industry standard ratings for eco-efficiency of IT equipment and welcome the EPA's ENERGY STAR as a very useful programme to this end.

Specific comments:

Lines 191-192 and 196-200

Why not PXE boot the server into a hypervisor or into a simple environment to run a load test? We do not understand why this is difficult. We are sure that increasing numbers of servers will be sold diskless or with a flash-boot prom, so this looks like a significant weakness in the standard that needs removing asap.

Lines 229-233

Prefer to call this a "High Availability" server, not "Managed Server". The criteria should be:

- Must run with 2 or more power supplies in a redundant configuration.
- Must have a dedicated out of band management interface for administrative purposes.
- Must provide RAS (Reliability, Availability, Servicability) features over and above those found in basic computer servers (e.g. hot-swappable fans, hot-swappable disks, internal memory and CPU diagnostics, dual network or SAN capabilities).
- Marketed as a high-availability or RAS server.

Thank you for continuing to keep us involved in ENERGY STAR specification development.

Mit freundlichen Grüßen / Best regards

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