

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



OFFICE OF
AIR AND RADIATION

February 28, 2012

Dear ENERGY STAR Small Network Equipment Stakeholder or Other Interested Party:

The U.S. Environmental Protection Agency (EPA) welcomes your input on the attached Draft 1 Version 1.0 ENERGY STAR[®] Small Network Equipment (SNE) specification. Comments on Draft 1 are due to EPA **no later than March 30, 2012**.

EPA views improving the efficiency of Small Network Equipment (SNE) as an important opportunity for reducing national household energy use due to the large installed base of products, always-on status, and potential opportunity to enable energy savings in connected end point devices like computers, televisions, and set-top boxes. This Draft 1 specifications includes requirements and proposed efficiency levels based on testing by stakeholders and related conversations.

This draft incorporates input received from stakeholders in response to proposed revisions to the ENERGY STAR SNE Test Method and the ENERGY STAR SNE Draft Specification Framework Documents. Levels proposed in this Draft 1 Specification are based on data assembled between May 2010 and September 2011. Questions and important discussion topics are highlighted in note boxes located throughout the draft specification. The following list details key elements of Draft 1:

- Definition and Scope Clarification:
 - EPA was initially considering a definition of Small Network Equipment that included devices with a maximum wired port count of nine. EPA now proposes to include devices with less than or equal to 11 ports as well as a provision regarding primary operation outside of standard equipment racks.
 - In response to stakeholder feedback, product definitions are accompanied by a graphic to clarify the product assignment hierarchy (see Figure 1 in the Draft 1 specification).
- Efficiency Criteria:
 - An Average Power Consumption structure is presented as the primary energy efficiency metric. The average power of a Small Network Equipment product is calculated from tested WAN, LAN, and Wireless LAN power (as applicable/present in a particular device). Based on conclusions drawn from analysis of data received over the past few months, EPA proposes that evaluation be based on measurements at low traffic rates rather than requiring testing at multiple traffic rates.
 - EPA proposes a limited set of functional adders to account for scaling by Ethernet Port and the presence of Wi-Fi.
 - EPA supports the adoption of Energy Efficient Ethernet in small networking equipment and expects to require this functionality in the next version of the specification. EPA encourages stakeholder input on approaches to encourage early adoption of this technology as part of Version 1.0.
 - Further details on EPA's analysis of its dataset are provided in an accompanying document: *ENERGY STAR Notes on Data - Small Network Equipment Draft 1*.
- External Power Supplies: The efficiency performance requirements for all external power supplies used with Small Network Equipment reference Level V of the International Marking Protocol.

Further information on external power supply requirements is available at www.energystar.gov/powersupplies.

- **Non-Energy Requirements:** While energy efficiency remains the basis upon which top performers are selected, EPA has a longstanding practice of including criteria related to other aspects of product performance in ENERGY STAR specifications to ensure that overall product performance is maintained relative to a non-qualifying product. EPA has included a toxicity limit because Small Network Equipment products manufacturers have extensive experience with designing products free from certain toxic materials in compliance with the RoHS Directive. In addition, EPA is interested in feedback from stakeholders on whether any existing standards that address recycled content in and/or design for recyclability of products could apply to Small Network Equipment products

Stakeholders are encouraged to review the Draft 1 specification and send comments to networking@energystar.gov no later than March 30, 2012. For further information on specification development activities to date, visit the ENERGY STAR Product Development Web site at www.energystar.gov/NewSpecs and follow the link for "Small Network Equipment." EPA will host a webinar on **March 23, 2012 from 12:00 pm – 2:00 pm EST** to discuss the key elements of the draft and answer stakeholder questions. To participate in this online meeting, please RSVP via email to networking@energystar.gov with your contact information and "RSVP" in the subject line. Meeting details will be forwarded to participants shortly before the meeting.

Thank you for your continued support of the ENERGY STAR program. Stakeholder participation is critical to developing a meaningful specification and to the overall success of ENERGY STAR. Please feel free to contact me at (202) 343-9024 or song.una@epa.gov; or Evan Haines, ICF International, at (202) 572-9456 or ehaines@icfi.com with any questions or comments.

Sincerely,



Una Song
EPA Product Manager
ENERGY STAR for Office Equipment and Consumer Electronics