Comment from METI on Final Draft - ENERGY STAR® Server Specification (Version 1.0)

1) Explanation of Extra Components for Idle Allowance in Table4 (page 11)

The language explaining about Additional I/O Devices in Table4 is not enough clear to facilitate full understanding among all partners and stakeholders. In addition, it seems not well matched with what is written in Note 3 placed below the table. Please rewrite the both languages.

2) Tier2 Accreditation Requirement for Testing Laboratories (page 15)

Prior Tier2 or to adopt this requirement, the detailed study about this laboratory accreditation system is necessary with respect to its applicability to ENERY STAR program as well as its feasibility in all partner countries. According to some manufacturers, this accreditation system is not focused on power measurements, which is a major test target in ENERGY STAR. In addition, different countries/regions may have different conditions and status of the laboratory accreditation system. Therefore, it needs to be studied in details, before EPA decides to include it in Tier2. It is concerned that it may cause any unfairness among companies across countries/regions depending on how the accreditation system is working there, once it is included as requirement.

<u>3) Testing Voltage (page 20)</u>

METI supports EPA to include 100V test condition for products sold in Japanese market. Still it is believed that 100V should be the only test voltage for products with single-output PSU (100V) sold solely in Japan as ENERGY STAR. Some data centers in Japan are supporting 100V servers.