

March 25, 2013

Ms. Una Song
ENERGY STAR Product Development
U.S. Environmental Protection Agency
Energy Star for Office Equipment and Consumer Electronics
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Energy Star Small Network Equipment Specification Version 1.0.

Dear Ms. Song:

The Consumer Electronics Association (CEA), the Information Technology Industry Council (ITI), and the Telecommunications Industry Association (TIA) hereby jointly submit comments on the proposed scope and testing methodology for the draft ENERGY STAR Small Network Equipment (SNE) Specification Version 1.0.

I. INTRODUCTION

Industry appreciates the significant progress that has been made in developing the ENERGY STAR specification for small network equipment. Our members have long been supporters of the ENERGY STAR program in a variety of product categories and commend the program as a successful partnership between the Environmental Protection Agency (EPA), Department of Energy (DOE) and industry to recognize innovation in energy efficiency. Our members greatly value the ENERGY STAR certification, and rely on this certification to market their products to retailers and consumers. The development of the SNE specification represents a significant step forward for the ENERGY STAR program in recognizing and rewarding the energy efficiency of networking equipment.

Industry wants the SNE specification to be successful and emphasizes that because this represents the first effort by ENERGY STAR to create a specification for networking equipment,

technologies which are significantly more complex and varied than most product categories covered by ENERGY STAR, it merits EPA taking a longer, incremental approach before finalizing the specification. While the current draft specification is significantly improved over previous drafts, industry believes the specification will benefit from additional, comprehensive review by stakeholders to insure that the latest major changes to the draft will enhance the success of the final product. Industry recommends that the EPA issue a full Draft 3 of the SNE specification Version 1.0 for additional review by stakeholders prior to issuing a final draft. Industry also recommends that Power-over-Ethernet (PoE) powered equipment be excluded from SNE Version 1.0 and be considered for inclusion in the Large Network Equipment (LNE) specification. Industry also recommends that the SNE specification differentiate between single-band and dual-band wireless routers and establish separate energy consumption limits for each as distinct categories.

II. DISCUSSION

1. Industry recommends that the EPA issue a full Draft 3 of the SNE specification Version 1.0 for additional review by stakeholders prior to issuing a Draft Final of the specification.

Industry is concerned about EPA moving to a Draft Final specification prior to stakeholders having the opportunity to fully review the specification in detail, including the most recent, substantive and major updates. ENERGY STAR and industry will be better served by spending additional time on Version 1.0 than by counting on correcting deficiencies in subsequent revisions. Despite the length of time over which this specification has been developed, industry is not currently confident that the specification is ready to go to Draft Final.

Many companies impacted by this specification have not previously had products covered by an ENERGY STAR specification and have not engaged with ENERGY STAR in the

specification development process. As industry associations, we have continued to conduct outreach to our members informing them about the SNE specification. We continue to identify companies that were either unaware of the specification or unaware that their companies had products covered by the scope of the specification.

The recent supplemental data request issued by the EPA has been extremely helpful as an additional opportunity for our associations to do outreach with impacted companies. Given the number of vendors and variety of technologies covered by this specification, we believe it is critical to have a full and thorough review of the draft specification including the most recent substantive edits prior to release of the Draft Final to insure adequate opportunities for stakeholder participation and to insure the success of the specification. A deficient SNE specification could also have negative implications for the LNE specification currently under development.

2. Industry recommends that the scope of the SNE specification be further refined in its efforts to distinguish between consumer-grade and enterprise-grade equipment and explicitly exclude PoE powered equipment from Version 1.0 and consider including PoE equipment in the LNE specification.

While industry appreciates the challenge in drawing a clear line between enterprise and consumer equipment, the current definition being used to distinguish between SNE and LNE does not match real-world uses of the equipment and will result in enterprise-grade equipment being tested in comparison with consumer-grade equipment, which will result in inadvertently making certain equipment ineligible for the ENERGY STAR program. This will force some end users with ENERGY STAR procurement requirements to either obtain waivers or buy large networking equipment where small network equipment would be better suited. The current classification of LNE and SNE proposed in the Version 1.0 drafts attempt to define all network equipment under the LNE and SNE categories with differentiating characteristics based on the

number of ports and whether the equipment is rack-mounted. Industry believes that for ENERGY STAR purposes it is not possible to subdivide the entire network equipment domain into two broad categories, LNE and SNE. Rather than attempting to fit all network equipment into the SNE and LNE definitions, industry recommends an alternative distinction focused on SNE and LNE as non-comprehensive product categories or subsets of selected equipment types that EPA chooses to cover under the ENERGY STAR program. Specific to SNE, this can be accomplished in part by excluding certain equipment types from Version 1.0 to either be addressed in a later revision or to be moved to the LNE specification as appropriate.

Under the current definition of SNE, some PoE equipment would be included in the SNE specification. Industry strongly recommends that PoE powered devices be excluded from Version 1.0, and that EPA consider moving PoE powered devices to the LNE specification. Most wireless networking products used in enterprise environments rely on PoE. Because of its unique characteristics from other networking equipment, industry recommends that PoE powered equipment should be included in the LNE category as a separate product category with unique testing requirements.

3. Industry recommends that the SNE specification differentiate between single-band and dual-band routers and establish separate energy consumption limits for each as a separate category.

Draft 2 of Version 1.0 does not distinguish between single-band and dual-band routers. Industry strongly recommends that single-band and dual-band routers be separated into distinct categories with separate energy allowances. Because single-band and dual-band routers have vastly different energy use profiles, energy use comparisons between the two would significantly disadvantage dual-band routers. Creating separate categories for single and dual-band routers will allow dual-band routers a greater opportunity to earn the ENERGY STAR rating.

III. CONCLUSION

Industry appreciates the opportunity to provide additional input to the EPA regarding Version 1.0 of the SNE specification for ENERGY STAR, and looks forward to continuing to work with the EPA and other stakeholders.

Respectfully submitted,

CONSUMER ELECTRONICS ASSOCIATION

/s/ DOUGLAS JOHNSON

Douglas Johnson
Vice President
Technology Policy

Bill Belt
Senior Director
Technology & Standards
1919 South Eads Street
Arlington, VA 22202

INFORMATION TECHNOLOGY INDUSTRY COUNCIL

/s/ ERICA LOGAN

Erica Logan
Director, Environment and Sustainability
Information Technology Industry Council
1101 K Street, NW Suite 610
Washington, DC 20005

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

/s/ DANIELLE COFFEY

Danielle Coffey
Vice President
Government Affairs

Joseph Andersen
Director, Technology & Innovation Policy
Telecommunications Industry Association

1320 Court House Road, Suite 200
Arlington, VA 22201
Tel: (703) 907-7700
jandersen@tiaonline.org

The **Consumer Electronics Association (CEA)** is the preeminent trade association promoting growth in the \$209 billion U.S. consumer electronics industry. More than 2,000 companies enjoy the benefits of CEA membership, including legislative advocacy, market research, technical training and education, industry promotion, standards development and the fostering of business and strategic relationships. CEA also owns and produces the International CES – The Global Stage for Innovation. All profits from CES are reinvested into CEA’s industry services. Find CEA online at www.CE.org, www.DeclareInnovation.com and through social media.

The **Information Technology Industry Council (ITI)** is the premier advocacy and policy organization for the world’s leading innovation companies. ITI navigates the relationships between policymakers, companies, and non-governmental organizations, providing creative solutions that advance the development and use of technology around the world. Visititic.org to learn more.

The **Telecommunications Industry Association (TIA)** represents the global information and communications technology industry through standards development, advocacy, tradeshow, business opportunities and market intelligence. TIA’s hundreds of member companies’ products and services empower communications in every industry and market, including healthcare, education, security, public safety, transportation, energy, government, the military and entertainment. Our members work through TIA’s voluntary, consensus-based standards process to enhance the business environment for telecommunications, broadband, mobile wireless, information technology, networks, cable, satellite, unified communications, emergency communications and the sustainability of technology. TIA is accredited by the American National Standards Institute (ANSI).