



TELECOMMUNICATIONS
INDUSTRY ASSOCIATION

1320 N. Courthouse Rd., Suite 200
Arlington, VA 22201 USA
www.tiaonline.org

Tel: +1.703.907.7700
Fax: +1.703.907.7727

June 7, 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 Product Specification for Small Network Equipment Draft 3 Version 1.0.

Dear Ms. Song:

The Telecommunications Industry Association (TIA) hereby submits comments regarding the ENERGY STAR Product Specification for Small Network Equipment (SNE) Draft 3 Version 1.0.¹

I. INTRODUCTION

TIA represents the global information and communications technology industry through standards development, advocacy, 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,

¹ See ENERGY STAR Product Specification for Small Network Equipment Eligibility Criteria (Draft 3 Version 1.0 SNE Specification) available at: www.energystar.gov/products/specs/sites/products/files/Draft%203%20Version%201%200%20SNE%20Specification.pdf.

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).

Many TIA members produce equipment covered by the ENERGY STAR Small Network Equipment (SNE) specification. TIA 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 EPA, DOE and industry to recognize innovation in energy efficiency. TIA appreciates the complexity of the SNE equipment category relative to other product categories typically covered by the ENERGY STAR program and applauds the incremental approach that EPA has taken in development of the SNE specification. TIA believes that the supplemental data call as well as the release of a Draft 3 will result in a better Version 1.0 specification for this product category.

TIA believes Draft 3 of the specification includes significant improvements over the previous draft. TIA supports the exclusion of Power over Ethernet (PoE) equipment from the specification. TIA believes the ENERGY STAR Large Network Equipment (LNE) specification is the appropriate specification for addressing enterprise network equipment and that to the degree possible, the SNE specification should focus on consumer grade equipment. TIA anticipates future innovation and consolidation of functionalities in the SNE product category, which will require continued flexibility from the ENERGY STAR program moving forward. TIA offers the following input.

II. DISCUSSION

1. TIA supports the exclusion of enterprise Power over Ethernet (PoE) network equipment from the SNE specification

Draft 3 explicitly excludes:

Network Equipment that is marketed and sold as enterprise Network Equipment and meets one or more of the following additional criteria:

- is shipped without a power supply;
- requires a separate external access point controller for operation.²

TIA supports this exclusion of enterprise network equipment from the SNE specification.

Enterprise PoE network equipment and network equipment requiring a separate access point controller feature unique characteristics from other network equipment in the SNE specification in terms of energy use and are appropriately excluded from the SNE specification. As these types of equipment are optimized for use in enterprise networks, it would be appropriate to deal with these devices as part of the LNE specification.

2. TIA generally recommends that the SNE specification focus on consumer equipment and that the LNE specification focus on enterprise equipment.

TIA recognizes the difficulty in drawing a perfect line between consumer and enterprise grade equipment for the purposes of classifying products for the SNE and LNE specification. While a perfect categorical division between consumer and enterprise equipment may not be feasible, there are cases where enterprise equipment with specific attributes, features and performance characteristics can and should be excluded from the SNE specification, and included in the LNE specification. Wherever possible and appropriate, as with the exclusion of PoE network equipment from the SNE specification, TIA recommends that enterprise equipment be excluded from the SNE specification. In addition to the critical need to avoid testing enterprise-grade equipment in comparison with consumer-grade equipment, the consumer and enterprise equipment domains consist of different stakeholder groups meeting very different market requirements. Equipment designed to operate in a large network has fundamentally different requirements to equipment designed to operate in a small network, therefore the

² See Draft 3 Version 1.0 SNE Specification at 5.

assessment of energy efficiency should be tailored to the required operation. TIA believes that the more that consumer and enterprise equipment can be classified respectively between the SNE and LNE specifications, the more successful both specifications will be. TIA recommends that the EPA consider stating in the SNE specification the general intent of the SNE specification to focus on consumer equipment.

3. TIA recommends that the definition of Small Network Equipment be further clarified

Draft 3 defines Small Network Equipment as follows:

Small Network Equipment (SNE): Network Equipment that is intended to serve users in either small networks or a subset of a large network. SNE includes a) all Network Equipment with integral wireless capability and b) other Network Equipment meeting all of the following criteria:

- a) Designed for stationary operation;
- b) Contains no more than eleven (11) wired Physical Network Ports;
- c) Primary configuration for operation outside of standard equipment racks;
- d) Meets the definition of one or more of the Product Types defined below.³

TIA believes that a “subset of a large network” is fundamentally different to a “small network” in the same way that a subset of an office building is fundamentally different to a home. TIA believes the intent in including the unrestricted language “a) all Network Equipment with integral wireless capability” was an effort to include all access points within the SNE specification. As written, such a definition is overly broad and may include many devices such as cellular base stations, microwave bridges or large-scale routers using Bluetooth/NFC for console connections, which TIA does not believe is the intent of ENERGY STAR. TIA recommends that the definition be further clarified to define what is meant by Network Equipment with integral wireless capability. For example, the definition could be limited to network equipment with 802.11 Wireless LAN access point capability.

³ See Draft 3 Version 1.0 SNE Specification at 1.

TIA believes that the exclusion of devices configured for standard rack mounting helps to separate enterprise and industrial equipment, but further criteria are needed. For example, the necessary criteria should include: "configured for indoor operation;" or "configured for operation in residential and commercial environments."

4. TIA anticipates future innovation and consolidation of functionalities in the SNE product category, which will require continued flexibility from the ENERGY STAR program moving forward

TIA appreciates the flexibility provided by the ENERGY STAR program in working with industry to continually revise specifications based on changes and updates in technologies deployed. This flexibility is critical to the ICT industry as 1) network equipment products evolve more rapidly than other equipment typically covered by ENERGY STAR, and 2) there are natural convergence points in ICT equipment where over time various functionalities are consolidated into a single piece of equipment. Products within the SNE specification will likely see rapid evolution over the next decade based on market demand and the proliferation of sensors and other connected devices in the home. The ENERGY STAR SNE specification will require flexibility to adjust to various functionalities being consolidated into products in the SNE specification.

III. CONCLUSION

TIA appreciates the opportunity to provide additional input to the EPA and DOE regarding Version 1.0 of the SNE specification for Energy Star, and looks forward to continuing to work with the EPA, DOE and other stakeholders moving forward.

Respectfully submitted,

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