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September 3, 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 Version 1.0 Test Method

Dear Ms. Song:

The Telecommunications Industry Association (TIA) hereby submits the following comments regarding the ENERGY STAR Small Network Equipment (SNE) Version 1.0 Final Test Method.¹

1. TIA recommends that additional technical guidance be provided to insure uniform testing under the test method.

TIA recognizes the challenges and progress made in developing the Version 1.0 specification for SNE. As this is a first version specification, TIA recommends that EPA provide additional technical guidance on how the test method should be conducted to insure uniform testing under the new test method. TIA is concerned that several sections in the test method could in practice be read to allow for divergent test procedures. Making explicit which test procedures are mandatory and which are optional will result in more accurate and comparable product testing. Additionally, clear examples of how the test method should be performed will also help insure

¹ See ENERGY STAR Small Network Equipment Specification V. 1.0 Final Program Requirements, available at www.energystar.gov/products/specs/sites/products/files/SNE%20V1_0%20Final%20Program%20Requirements.pdf

uniform testing under the test method. The included copy of the test method highlights areas where additional clarification and examples are needed.

CONCLUSION

TIA appreciates the opportunity to provide additional input to the EPA regarding the SNE test method and looks forward to continuing to work with the EPA and other stakeholders moving forward.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

/s/ DANIELLE COFFEY

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