Version 3.0 ENERGY STAR Telephony Draft 1 Specification and Draft 3 Test Method Stakeholder Comment Summary and Response

Topic	Subtopic	Stakeholder Comments	Responses
Cordless Analog Base Allowance		Two stakeholders commented that the Draft 1 proposed Base Allowance for Cordless Analog Telephones is too low-- EPA analysis failed to take into account the power associated with all Additional Handsets required to be tested with the base station per the Draft Version 3.0 Test Method, as Version 2.2 data are not reflective of this configuration. Manufacturer B Version 3.0 data showed an average increase in Partial On power of 0.44 W (std. dev. 0.08 W) when tested with Additional Handsets active in the system as compared to testing without Additional Handsets. Therefore the stakeholder suggested a limit of 1.5 W (0.9 W power of best-performing models plus 0.44 W mean Additional Handset power increase plus two standard deviations).	In response to the stakeholder comments, the U.S. Environmental Protection Agency (EPA) has increased the base allowance for Cordless Analog Telephones by 0.4 W from the 0.9 W proposed in Draft 1 to 1.3 W in Draft 2 to account for the differences in the Version 3.0 and Version 2.2 ENERGY STAR Test Methods. EPA has further decided to revise the number of Additional Handsets tested with the base station from the maximum configuration in Draft 1 to only two Additional Handsets in Draft 2 to better represent actual use and reduce ambiguity. With Version 3.0 analog data limited to one manufacturer, EPA is unable to assess how power needed for radio transmission to Additional Handsets may vary among manufacturers and technologies. Nevertheless, EPA is aware of models that are capable of reducing transmission power between the highest and lowest level by roughly a factor of three. Therefore, EPA proposes that the 0.4 W is sufficient given that the base station is tested with Additional Handsets in near range (3 meters) allowing it to potentially implement power saving measures. Finally, EPA has introduced a new separate base allowance of 1.1 W for Corded Analog Telephones based on Version 2.2 data with the same upward adjustment of roughly 0.4 W for two Additional Handsets tested with the base station under Version 3.0.
VoIP Base Allowance		One stakeholder commented that the Draft 1 proposed Base Power Allowances and Additional Functional Adder for Gigabit Ethernet might only be realistic for low-end VoIP Telephones. High-end VoIP Telephones with a strong CPU and larger memory and in particular Gigabit Ethernet Telephones with a built-in switch may have difficulty meeting the Draft 1 power limits. The stakeholder recommended EPA consider the European Commission Code of Conduct for Broadband Equipment levels of 2.7 W for 10/100Base-T VoIP Telephones and 3.9 W for 1000Base-T VoIP Telephones.	EPA notes that the European Commission Code of Conduct (CoC) is intended to cover most of the market whereas the ENERGY STAR program targets the top 25% of the market. With these programmatic differences in mind, the Draft 1 Base Allowance of 2.0 W for VoIP Telephones and the Additional Allowance of 1.0 W for Gigabit Ethernet are not out of line with the European Commission Code of Conduct values. Further, EPA has included an additional allowance of 0.2 W for IEEE 802.3az compliant Gigabit Ethernet ports and incentive allowances for External Proxy functionality and Off Mode which are more likely to be features of models with a strong CPU and larger memory. EPA would like to ensure that these higher-end models are delivering power saving options to purchasers and proposes to maintain the additional and incentive allowances in Draft 2 to achieve this objective. Finally, EPA analyzed new VoIP Telephone data that confirm 1.0 W is an appropriate allowance for Gigabit Ethernet, so it is maintaining this value in Draft 2.

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Additional Functional Adders		One stakeholder recommended that EPA remain open to including more Additional Functional Adders as manufacturers continue to add features that benefit the consumer but also impact power consumption (e.g., color LCD screens, Media Encryption capability, and speakerphones).	EPA remains open to this idea but does not currently have data to support increased power allowances for these features. EPA invites stakeholders to submit additional data for telephones tested with the Draft Version 3.0 ENERGY STAR Test Method.
Off Mode	Definition & Capability to Receive Calls	One stakeholder expressed concern that the phrase "absent external stimulus ..." could imply that the Telephone must respond to external stimulus in some particular manner while in the Off Mode. The stakeholder proposed the revised definition below commenting that: 1) It is not feasible to expect that PoE-powered VoIP Telephones can be made capable of receiving calls at low power levels (i.e. in the 0.5W---1.0W range) 2) It should be up to individual ENERGY STAR Partners to decide when and how their Telephone wakes up from Off Mode so as not to discourage vendors from supporting an Off Mode. "Off Mode: A mode that may persist for an indefinite time when a Telephone is connected to a power source and a telephone line or other physical or wireless network connection and is NOT capable of receiving a call." A second stakeholder concurred that the definition take into account various Off Mode options offered by different manufacturers.	Based on stakeholders' feedback, EPA has removed the language "absent external stimulus such as network initiation, physical interaction with the receiver or other part of the Telephone" from the definition of Off Mode. EPA agrees that the definition should simply state that the phone is incapable of receiving calls. In order to receive the Off Mode Incentive, EPA is instead proposing revised power management requirements in Section 3.4.1 of Draft 2 specifying that the phone must be capable of entering or exiting Off Mode via some form user- or device-initiated action to ensure that Off Mode is not solely implemented from the network end.
Off Mode	Feasibility	One stakeholder commented that many of its recently released and future Telephones contain/will contain technology which it believes meets EPA's Draft 1 proposed requirements for Off Mode.	EPA appreciates the comments and the support for its proposal.
Off Mode	Power	One stakeholder agreed with EPA's assertion that power levels of 0.5 to 1.0 W are feasible for a VoIP Telephone in Off Mode if the statement about external stimuli is removed from the Off Mode definition as the stakeholder suggested and if Section 3.4.1 remains as currently worded.	
Off Mode	Incentive Calculation	One stakeholder expressed support for the incentive calculation formula in the Draft 1 Equation 3, which provides an Off Mode Incentive proportional to the difference between Off Mode power consumption and Partial On Mode power consumption.	
Off Mode	Implementation	One stakeholder agreed with Draft 1 Section 3.4.1 that requires Telephones claiming the Off Mode incentive to provide two of the three described actions.	

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Test Reporting Template	Test Reporting Template	One stakeholder recommended that the text in Row 63, Column C of the “General” worksheet in the Test Reporting Template be changed from “Network Speed PoE Mode” to “PoE Mode” because the network speed and the PoE mode are not related parameters.	The U.S. Department of Energy (DOE) agrees that Network Speed PoE Mode is an incorrect term and has updated the specified cell in the Test Reporting Template to read "PoE Mode."