Sifos Technologies, Inc.

Comments on the ENERGY STAR® Telephony Draft 1 Test Method, and the Telephony Test Data Template. Rev. May-2012

Comment 1 - Lines 183, 184

In the list of PoE methods "Gigabit PoE" is introduced. "Gigabit PoE" is not a PoE Mode nor a PoE method that can be distinguished from Mode A or Mode B, and is not a defined term under the 802.3at standard. "Gigabit" references Ethernet date rate and is not a Powering mode. Line 259 separately addresses network speed requirements of the test. We suggest removal of the term "Gigabit PoE".

Commensurately, we suggest that the Telephony Test Data Template Entry in Sheet 2, Cell 61:C be changed from "Network Speed PoE Mode (A,B,Gigabit PoE)" to "Network PoE Mode (A or B)".

There are emerging "4-pair" (Mode A + Mode B) powering schemes, however these are not allowed under the standard. If tests are allowed with such 4-pair powering, there will be efficiencies that are not present in standard 2-pair powering. We therefore suggest that 4-pair testing be excluded from the test procedures.

Comment 2 - Lines 246, 247, and 249

PoE Power Meter instrumentation may incorporate the power supply circuits necessary for powering the Telephone in order to allow power characterization over ranges of Voltages and for measurements of other PoE parameters. Instrumentation in this configuration typically has an Ethernet data by-pass feature that allows Ethernet communications for testing, control, and operation of the Telephone. When a PoE Power Meter in this configuration is used, it is not necessary if the PoE Power Meter is connected to a PoE-Powered Port on an attached switch.

We suggest changing "a PoE port on a suitable Switch" to "a port on a suitable Switch" in lines 246 and 247. Commensurately, we suggest changing "i) Supports all modes of PoE that the Telephone can support" to "i) Supports all modes of PoE that the Telephone can support, unless PoE power is supplied by the Power Meter instrumentation" in line 249.

We further suggest that "PoE Power Meter" be defined as a Meter which:

- 1) Measures PoE Power Draw on ALT-A and ALT-B at both polarities
- 2) Enables Ethernet link and packet traffic flow to PD at all link rates (10/100/1000) from a link partner

3) Sources PD Power on ALT-A and ALT-B at both polarities or allows a PSE (switch) to source power to a PD on ALT-A and ALT-B at both polarities

Comment 3 - Line 254

If a second telephone is only used for operational mode testing and is not being tested for power consumption, then there is no need to require that it be PoE powered.

We suggest changing the text from "PoE Telephone" to "telephone".

Comment 4 - Lines 292, 320, 338

The text in the test procedures describes the collection of samples at "an interval greater than 1 reading per second". This is confusing because an interval is a measure of time and "1 reading per second" is a measure of rate or frequency.

We suggest changing the word "interval" to "rate" in these instances.