



January 17, 2012

Attn: RJ Meyers
ENERGY STAR Data Center Products Manager
Meyers.Robert@epa.gov

Dear. Mr. Meyers,

Thank you for the opportunity for NASBA, The Association of Channel Resellers, to provide input to the ENERGY STAR version 6.0 draft 3, development. NASBA is the largest professional trade association for channel resellers in North America (with over 14,000 members in our database and more than 3,400 active voting members) and represents the interests of small to medium information technology businesses in the U.S. NASBA builds strategic relationships with key VAR, integrator and solution provider members and leading technology companies. NASBA fuels partner growth in the information technology (IT) and consumer electronics (CE) industries through targeted services such as their End-to-End Solutions Selling platform, Technology Conferences, Themed events, Industry Intelligence, Web Services, and unique media and marketing programs.

In 2012, channel sales of desktop computers in the United States were estimated at about 12 million units (\$7.9 billion) or 25% of total desktop system shipments (overall shipment volume provided by December 2012, IDC #238203, Volume: 1; Personal Computing: Market Analysis, 19).

To enable the channel to foster innovations in energy savings, power management and usage models in a difficult economic environment, we respectfully submit the following suggestions:

Provisions 3.4.1 and 3.4.2

Information about ENERGY STAR and the benefits of power management, to be located at or near the beginning of the hard copy or electronic user manual, or in a package or box insert.

Suggestion: please provide a template with the preferred language to model. This will clarify the requirement as well as ensure the requested information is included.

Provision 3.4.3

Provisions 3.4.1 and 3.4.2 may be met through use of either electronic or printed product documentation

Suggestion: allow documentation to be posted on the company site. This removes the need for costly printing/media encoding. Channel volumes are often small, which do not gain the efficiencies of scale, especially in media generation.

Provision 3.5.1

Categories for TEC Criteria

Suggestion: use the ITI performance criteria as this model is simpler to calculate the category definition (which category the system belongs to), reducing the risk of misinformation.

Provision 3.5.1 and Note

Integrated graphics categories:

Suggestion: use two integrated graphics categories, not 3 for both desktop and notebook.

Using two categories is more efficient in determining system category placement.

Note: in notebooks, the 3rd category system was for switchable graphics notebooks, but this is not part of the definition for NB I3, therefore, does not align with the EPA goals as stated in the note.

Thank you for your time and consideration.

Best regards,

Pat Taylor
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