



June 19, 2012

Reference: ENERGY STAR® Program Requirements for Computers. Partner Commitments. Draft 2, version 6.0

Subject: National Association of Channel Resellers (NASBA) comments for consideration

To Whom It May Concern,

Thank you for the opportunity for the National Association of Channel Resellers (NASBA) to provide input to the ENERGY STAR® version 6.0 Program Requirements for Computers. As you may know, NASBA represents thousands of IT solution providers, value added resellers, integrators, distributors and system builders in North America.

Please see our comments and recommendations in the following and let me know if I can provide additional detail or commentary.

- Defining tablets—Draft 2, Rows 35-37
In addition to the proposed non detachable physical keyboard requirement, we request the following also be added as options (meeting any one of these in addition and/or having the physical keyboard) for meeting the definition of a tablet
 - Wired Network Port
 - External video connector
 - Other device connections like USB

We believe including these attributes in the tablet definition will help to correctly differentiate tablets from slates in the market. Example, several manufacturers are producing notebook class (in terms of performance and components) systems which do not have an external keyboard but does have wired network ports, external video connectors and USB ports. Please advise if you would like to see examples of actual systems in the marketplace.

- Battery charger Specification—Referenced in rows 236-252

Seeking clarification regarding if EPA approved labs for computers also be required to get certified to submit test results for the Battery Charger Specification requirements?
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We believe additional certification requirements beyond the current ENERGY STAR* for computers certified lab requirements are unnecessary and will force currently certified labs to increase their fee structures to cover additional costs.

- Power supply requirements—Referenced in rows 287-306.

For EPS and IPS requirements we believe a 10% testing level is not needed. This would create the need for extra testing outside of the currently mandatory 80 Plus testing. We believe the 80 Plus testing requirements accurately rate power supply efficiency. A 10% testing level requirement poses a significant disadvantage for small and medium businesses due to increased costs and sourcing new PSU's tested by ECOVA by Jan 2012.

- Category definitions

NASBA recognizes ITI has proposed different category systems as compared to the EPA category proposal. NASBA constituents would like to see a category system separating integrated desktops from standard desktop systems. Our rationale is display components vary greatly between standard and integrated desktops, affecting base desktop TEC among very different systems.

Additionally, we would like separation between discrete and integrated graphics. Integrated graphics systems, not receiving graphics adders, will continually show a lower base TEC, even though overall energy efficiency should actually be greater than a discrete graphics based system.

Thank you,

Pat Taylor
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NASBA