

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
AIR AND RADIATION

November 15, 2012

Dear ENERGY STAR Small Network Equipment Stakeholder or Other Interested Party:

The U.S. Environmental Protection Agency (EPA) welcomes your input on the attached Draft 2 Version 1.0 ENERGY STAR[®] Small Network Equipment (SNE) specification and Final Draft of the Small Network Equipment Test Method. Comments on these documents are due to EPA **no later than January 4, 2013**.

This draft incorporates input received from stakeholders in response to proposed revisions to the ENERGY STAR SNE Draft 1 specification and ENERGY STAR SNE Test Method. Questions and important discussion topics are highlighted in note boxes located throughout the draft specification. The following list details key elements of Draft 2:

- Definition Clarification:
 - EPA has revised the Access Point definition to provide additional clarify. EPA has also included a definition for Product Family. The goal of this family definition is to reduce the testing burden while ensuring that all “members” of the Product Family deliver the same energy savings to the end user. EPA seeks stakeholder feedback on these changes.
- Efficiency Criteria:
 - EPA has made improvements to its dataset so that it more accurately reflects the current SNE market. EPA received additional stakeholder test data, increasing the existing dataset by 44%. Using the revised dataset, EPA was able to split the IAD category into Cable and DSL based IADs, to propose base power allowances for Cable and DSL Broadband Modems (both ADSL and VDSL) and Access Points, as well as revised levels for Routers and Switches. No changes were made to the base power allowance for ONT modems. The changes to the previously published base power allowances are as follows:

Base Power Allowances Changes from Draft 1 vs. Draft 2

Product Type	P _{BASE} (watts) Version 1.0 Draft 1	P _{BASE} (watts) Version 1.0 Draft 2
IAD – All	8.0	N/A
IAD - Cable	N/A	6.0
IAD - ADSL	N/A	5.5
IAD - VDSL	N/A	8.4
Router	4.5	3.2
Switch	2.5	0.6

- EPA has included incentives for Energy Efficient Ethernet and Proxying.
- In response to stakeholder feedback for additional adders, EPA has specified areas where there is insufficient data required for consideration.

- Non-Energy Requirements:
 - Toxicity and recyclability requirements in Section 3.5 of Draft 1 have been moved to the Partner Commitments under the Qualifying Products Section in Draft 2.
- Optional Performance Reporting
 - Section 4.4 provides guidance on additional performance information that may be reported with the product evaluation data.
- Test Method:
 - EPA has provided minor clarifications in the test method and is releasing it as a Final Draft test method with the Draft 2 specification.

Stakeholders are encouraged to review the attached documents and send comments to networking@energystar.gov no later than January 4, 2013. For further information on specification development activities to date, visit the ENERGY STAR Product Development Web site at www.energystar.gov/NewSpecs and follow the link for “Small Network Equipment.” EPA will host a webinar on **December 11, 2012 from 11am – 1pm EST** to discuss the key elements of the draft and answer stakeholder questions. To participate in this online meeting, please RSVP via email to networking@energystar.gov with your contact information and “RSVP” in the subject line. Meeting details will be forwarded to participants shortly before the meeting.

Thank you for your continued support of the ENERGY STAR program. Stakeholder participation is critical to developing a meaningful specification and to the overall success of the ENERGY STAR program. Please feel free to contact me at (202) 343-9024 or song.una@epa.gov; or John Clinger, ICF International, at (202) 572-9432 or John.Clinger@icfi.com with any questions or comments. Questions regarding the Final Draft of the Small Network Equipment Test Method can be directed to Bryan Berringer, DOE, at bryan.berringer@ee.doe.gov or (202) 586-0371.

Sincerely,



Una Song
EPA Product Manager
ENERGY STAR for Office Equipment and Consumer Electronics