

Topic	Subtopic	Stakeholder Comments	EPA Response
Scope	Ports	<p>Two stakeholders expressed concern that the Final Draft SNE definitions and scope could result in enterprise equipment being compared and rated to consumer equipment and a potentially large group of products falling into the gulf between the ENERGY STAR SNE and Large Network Equipment (LNE) programs which would have negative consequences for both government procurement and network operator purchases. One of these stakeholders commented that it is necessary to state explicitly that products with less than 11 wired ports that have modules; are rack-mountable; or are out of scope for some other reason will be addressed by the ENERGY STAR Large Network Equipment specification. The other stakeholder recommended that for future revisions the distinction between LNE and SNE rely on performance characteristics rather than the number of ports. The stakeholder further urged EPA to be flexible in providing exceptions, exclusions and modifications for products that do not fit well into either category and to insure that consumer and enterprise equipment are included in the appropriate category.</p>	<p>EPA is maintaining the current scope in the Version 1.0 Small Network Equipment (SNE) Final Specification as it is the clearest manner in which EPA make clear products intended to be covered under this specification. EPA will consider all relevant comments on scope divisions in both the development of the Version 1.0 Large Network Equipment (LNE) Specification, as well as the Version 2.0 SNE Specification.</p>
Scope	Integral Wireless Capability	<p>One stakeholder recommended that access points associated with an access point controller should be included in the ENERGY STAR Large Network Equipment specification as enterprise equipment rather than the SNE specification. The stakeholder noted that there is a possibility going forward that there may be integrated access devices (IAD) that have more than 11 ports but also have built-in wireless capability, which under the SNE definition would be excluded from either category. Additionally some enterprise wireless equipment uses modular wired interfaces (SFP or SFP+ modules) or modular wireless interfaces (pluggable radios). Thirdly, some small enterprise switches and routers with less than 11 ports, use modules for uplinks and WAN links, which will also result in a gap in coverage under the current definition.</p>	<p>The Version 1.0 LNE Test Method under development currently has no provisions for wireless performance testing. At this time, EPA intends to cover products whose primary functionality is wireless connectivity through the SNE Specification, covering as many products as current market information and data allow in Version 1.0, and expanding the scope in this area in future SNE specification revisions as new product data allows.</p>
Scope	Modular	<p>One stakeholder recommended that the definition and scope of modular equipment in the SNE and Large Network Equipment (LNE) specifications be clarified. Currently, the SNE specification seems to exclude all types of modular network equipment and the LNE specification is unclear whether it defines modular in the broadest or narrowest sense of the term. For testing purposes, the stakeholder recommended that EPA consider dividing modular network equipment into three types of modularity:</p> <ol style="list-style-type: none"> <li>1) Systems with module sockets for interfaces that are fixed in number and speed (e.g. media adapters, SFP modules, etc.)</li> <li>2) Systems with modules that change the number and/or speed of interfaces but do not change the functionality (e.g. adapter modules that support 8 x 1Gbps or 1 x 10 Gbps, chassis systems with interface blades sharing a fixed forwarding fabric, etc.)</li> <li>3) Systems supporting modules that can change the functionality of the combined unit (e.g. complex chassis with packet processing blades, etc.)</li> </ol>	<p>EPA is reviewing this question as part of the LNE specification development process. As modular products are not in scope for the Version 1.0 SNE Specification, EPA is not considering this comment as it relates to SNE.</p>
Scope	PoE	<p>One stakeholder recommended that PoE products be included in the ENERGY STAR Large Network Equipment (LNE) program rather than SNE regardless of port count noting that the current Final Draft results in the exclusion of a significant number of products, specifically PoE wireless products with 11 or less ports, from both the SNE and LNE specifications. Most wireless networking products used in enterprise environments rely on PoE such as within the education networking market.</p>	<p>Products that provide Power over Ethernet (PoE) , as well as products that are powered by PoE are not in scope for the Version 1.0 SNE Specification. The Version 1.0 LNE specification primarily focuses on products which provide PoE. EPA plans to revisit products that are powered by PoE in the Version 2.0 SNE Specification development process.</p>

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Reporting Requirements		<p>One stakeholder commented that there is a disconnect between the SNE Program Requirements, Test Methodology, and Equipment Template documents as to required and optionally reported information. The stakeholder commented that the information reporting requirements should be optional, as their inclusion as mandatory increases costs to ENERGY STAR partners.</p> <p>Conversely another stakeholder requested that the reporting be made mandatory, at least concerning information related to energy efficiency. Further the stakeholder suggested that the mandatory reporting includes power management functionality such as powering down at low traffic volume, scheduling WLAN in on and off periods and automatic switch off of unused interfaces. The information would also be useful for the future revisions of the specification.</p>	<p>The optional performance reporting requirements in Section 4.4 of the Version 1.0 SNE Specification are clearly marked as optional. All other product characteristics and performance fields that are listed as required in the SNE data reporting template are required to be submitted for all ENERGY STAR SNE products as part of the certification process. This data will be made available to consumers through the Qualified Product List and Product Finder tools on the ENERGY STAR website.</p>
Product Families and Representative Models		<p>One stakeholder commented that it would be beneficial to have examples of testing and limit calculations for examples in all of the product families, demonstrating the treatment of various functions. The stakeholder further commented that it is expected that testing, using the ENERGY STAR Test Method, should be demonstrated on each group of products prior to the publication of the final version of the specification.</p>	<p>Due to the timing of this request, EPA will develop example calculations for product submissions as well as test method calculations as requested, but these examples will be found shortly after the publication of the final specification in a separate example document which can be found on the ENERGY STAR website on the SNE product development page.</p>
Efficiency Criteria		<p>In Section 3.3.1, one stakeholder requested that EPA specify the type of average to be used in the various pseudo-equations (e.g. mean, median, etc. along with any weighting or other manipulation).</p> <p>The stakeholder also suggested that example calculations should be given for:  Product 1: IAD with DOCSIS 3.0 WAN Port, 4 port GE switch and Dual Radio Wireless Access Point Using 3 Stream 802.11ac and 2x2 802.11n  Product 2: 8 port GE switch with EEE  Product 3: IAD with VDSL WAN port, 4 port GE switch and Dual Radio Wireless Access Point Using 3 Stream 5 GHZ 802.11n and 2.4 GHz 2x2 802.11n</p>	<p>See response above.</p>
External Proxy Incentive		<p>One stakeholder commented that the External Proxy incentive values are quite high and not representative of the additional power consumption of the devices and instead suggested that the incentive is in the form of information from the US EPA and the European Commission on their websites regarding the added benefits by purchasing devices supporting full network connectivity. The stakeholder believes it is not advantageous for the consumers to buy a product, which should be more efficient, but which in reality is less efficient than other products.</p>	<p>EPA will maintain the current External Proxy Incentive to encourage SNE products to allow proxying of attached end-point devices. The system savings potential of allowing end-point devices (computers, imaging equipment products, etc.) to enter network connected sleep can far exceed the small incentive the SNE product may receive for supporting the proxy functionality. As this functionality becomes more mainstream, EPA will discontinue this incentive.</p> <p>EPA will make the level of supported External Proxy available on the ENERGY STAR website along with the other SNE product information.</p>
Test Method	Section 6.2 Wired Port Configuration	<p>One stakeholder commented that Item #5 refers to PoE, which is out of scope and therefore it should be deleted.</p>	<p>EPA has removed any remaining references to PoE in the revised Aug-2013 Final Test Method.</p>
Test Method	Section 6.5 UUT Preparation	<p>Section 6.5, 3) iii) (c.): One stakeholder commented that wireless test generators are no longer required, therefore this section needs to be completely revised.</p> <p>Section 6.5, 3) iii) (d.): One stakeholder commented that products that require external controllers are out of scope, therefore this section should be deleted.</p>	<p>EPA has reviewed both comments and does not agree that these sections should be removed based on the current specification and test method requirements.</p>

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Test Method	Section 7.1 Power Measurement Guidelines	<p>One stakeholder commented that Section 7.1 includes tests that are required for program compliance and optional tests that are only required for informational purposes and that the Test Method document should clearly distinguish between these two types of test.</p> <p>The stakeholder also commented that calculation of rates is difficult to understand, it is suggested that examples are given for:</p> <ol style="list-style-type: none"> <li>1: Gigabit Ethernet</li> <li>2: DOCSIS 3.0</li> <li>3: VDSL</li> </ol>	<p>EPA has clarified which information is optional to report, and which is required in both the specification and SNE QPX document. The test method is a more general document, designed to be used by a more general audience if desired, and is treated as such.</p> <p>EPA will develop examples for rate calculations for the three requested categories and include them in the separate example document which will be found on the ENERGY STAR website on the SNE product development page.</p>