

Final Draft Version 7.0 Computers Comment Summary

Ref. #	Organization	Topic	Comment Summary	Response
1	Summary	P-Score Requirement	One stakeholder recommends changing the p-score boundary denoted in Table 8 to allow products with a p-score of 8 to meet the category 2 requirements. This is consistent with the approach outlined in the Final Draft Cover Memo.	EPA has updated Table 8 to reflect that those products with a p-score of 8 will be treated as a NB2 product.
2	Summary	As-shipped Brightness	One stakeholder requests that EPA remove the new clause in section 4.2.1 that states that all models shipped as certified within a product family should maintain the same power management settings and default display brightness used when testing the representative model. The stakeholder comments that requiring models to be shipped at pre-defined display brightness levels and with ABC disabled would lead to major changes to the program and could have the unintended consequence of losing display power savings.	The clause within section 4.2.1 has been removed from the final specification. EPA acknowledges the argument that this would represent a major departure from how this is currently treated and will consider if any changes in approach are warranted as part of the V8.0 specification development process.
3	Summary	Base TEC limits assessment	One stakeholder comments that the proposed base TEC limits are cutting into normal testing and manufacturing variability and proposes including a 5% margin to account for this variability. The stakeholder proposes raising the NB1 base TEC to 9kWh and the NB2 base TEC limit to 15 kWh.	EPA thanks stakeholders for the additional data that was supplied in response to the November 2017 memo. EPA notes that proposed base allowances allow a significant number of products to meet them. EPA has not received any additional data to support reducing the criteria further.
4	Summary	Effective Date	One stakeholder requests that EPA make the Version 7 effective date January 15, 2019 to avoid undue burden on industry partners during the months of November and December 2018.	The November 16, 2018 effective date for the Version 7.0 specification has been maintained in the Final Specification. EPA notes that a significant number of products meet the final criteria now. Further, the November 16 date is a month and a half in advance of other governmental regulations coming into force and manufacturers are allowed to begin certifying products to Version 7 immediately, reducing work in the busy holiday time.