

Topic	Subtopic	Stakeholder Comments	EPA Response
Definitions	Two-in-One Computers	<p>A stakeholder suggested removing the requirement that two-in-one computers require physical keyboard to allow flexibility to have processing capability either on the lid, keyboard base or both. A stakeholder asked for more information on products with processing capability in the lid and the base.</p> <p>Another stakeholder requested clarification on the differentiation between two-in-one computers and slates/tablets and the reasons for including this new category. This commenter recommended that the terminology should be consistent with the typical use of the term two-in-one, which seems to be for a computer with a detachable display and a tablet with an attached keyboard.</p> <p>One stakeholder requested a definition of 'processing capability'. An additional stakeholder recommended the following be added to the definition of a two-in-one computer because PCs with detachable keyboards marketed as Notebook Computers should be considered two-in-one computers:</p> <p>"The detachable display combined with physical keyboard base must contain processing capability typically found in a Notebook Computer, which is connected to ac mains power through the physical keyboard base."</p>	<p>EPA is proposing to alter the Two-In-One definition and include it as a sub-definition under the Notebook Computer definition. The requirement to have processing power in the keyboard base of the product has been removed. Two-In-One Notebooks will be treated the same as traditional Notebooks in both the Version 6.1 eligibility criteria.</p>
Definitions	Slates/Tablets	<p>Stakeholders proposed a differing strategy than limiting screen size to omit smartphones from being included in the specification. The market is shifting toward tablets with potential to shrink in size, while smartphones have the potential to grow in screen size. Due to this trend, a commenter suggested explicitly stating within the definition that the function of the device should not be for use as a phone and including the language "Marketed as a Tablet/Slate computing device <i>and not as a phone</i>". Another stakeholder recommended the removal of the "Marketed as a Tablet/Slate" language altogether.</p> <p>Stakeholders also recommended clarification on whether phablets fit into this specification and language be added to address this. They also stated that it is hard to articulate hardware differences between notebooks and slates/tablets without a comprehensive study so this should be a topic for the future Version 7.0.</p> <p>A stakeholder recommended that the definition be harmonized with the EU Ecodesign regulation to avoid confusion by naming the product group either 'slates/tablets', 'slates', or 'slate computers'.</p>	<p>EPA is proposing to remove the "marketed as slate/tablet" language from the discussion document, as these products can be marketed with other terms that would not fall under this distinction, but would fall under the remainder of the slate/tablet definition.</p> <p>EPA is proposing to maintain the 6.5 inch diagonal screen size requirement at this time, but has revised the smartphone scope exclusion to include any portable computing device with cellular voice capability. The combination of these two sections should eliminate abnormally large phones from certifying as slate/tablets.</p>
Definitions	Desktop Computer and Notebook Computer	<p>A stakeholder provided proposed definitions for Desktop Computer and Notebook Computer below:</p> <p>"Desktop Computer: A computer whose main unit is designed to be located in a permanent location, often on a desk or on the floor. Desktop computers are not designed for portability and are designed for use with an external display, keyboard, and mouse. Desktop computers are intended for a broad range of home and office applications.</p> <p>(1) Integrated Desktop Computer: A Desktop Computer in which the computing hardware and display are integrated into a single housing, and which is either always connected to ac mains power through a single cable, or operates with a battery without a direct connection to ac main power source, with an intent to provide flexibility and limited portability to the end user to select a preferred location for use. Integrated Desktop Computers come in one of two possible forms:</p> <p>(1) a system where the display and computer are physically combined into a single unit (with either fixed or portable/mobile configurations); or (2) a system packaged as a single system where the display is separate but is connected to the main chassis by a dc power cord and both the computer and display are powered from a single power supply. As a subset of Desktop Computers, Integrated Desktop Computers are typically designed to provide similar functionality as Desktop systems.</p> <p>Notebook Computer: A computer designed specifically for portability and to be operated for extended periods of time both with and without a direct connection to an ac mains power source. Notebook Computers include an Integrated Display, a physical, mechanical keyboard (using physical, moveable keys), and pointing device."</p>	<p>EPA is proposing to allow Integrated Desktop Computers to operate with a battery without direct connection to ac mains for limited relocation purposes. Additionally, clarification has been added to ensure products that employ a clam shell form factor are not included within the Integrated Desktop Computer definition.</p>
Definitions	General	<p>A stakeholder stated that the current proposed definitions are adequate but will need to be revisited for Version 7.0 due to evolving computing form factors.</p>	<p>EPA acknowledges that data collected through the Version 6.1 certification process will allow for further improvements in dealing with portable computing devices in Version 7.0.</p>

Scope	Included Products	<p>A stakeholder expressed their support for expanding the scope to including slates and tablets and cites the current market and the forecasted growth in sales through 2016.</p> <p>Another stakeholder supported allowing these products to be categorized using the notebook computer performance calculations due to the fact that they are efficient devices and also the difficulties in separating low and high power devices within a short timeframe. This commenter referenced the EU regulation allowing these devices to be categorized with notebooks and also that the viewable diagonal screen size, of 9 inches, differs from the EPA proposed cut-off at 6.5 inches. They also stated that once scope, power modes, mode weightings, and display luminance for testing is set, then slates and tablets could be tested with some changes to the notebook test method.</p>	<p>EPA thanks for the stakeholders for these comments and is proposing to include slate/tablet products in the scope of Version 6.1. Due to the short development period of the Version 6.1 revision, EPA is proposing to use the existing Notebook criteria for all slate/tablet products.</p>
Scope	Excluded Products	<p>A stakeholder noted that non-PC based POS products could fall under the slate/table definitions. Another stated that the popular slate/tablet products on the market would not fall under the POS exclusion but there are some tablets being used for POS applications with specific enabling add-on hardware.</p> <p>A stakeholder proposed definitions for Smart/Mobile phones to ensure clear exclusion from the tablets/slates definition (rather than a screen size restriction):</p> <p>"Mobile Phones/Smart Phones: These devices have out-of-the-box cellular voice telephony, capable of connecting to a cellular network for voice communication through a service provider voice plan. Mobile phones that are also capable of connecting to a data network for access to the internet are sometimes called "smart phones" or "phablets" and fall under this mobile phone definition."</p> <p>This commenter also noted that slates/tablets may support cellular voice connectivity as a secondary feature but are not primarily designed for voice communication.</p>	<p>EPA is proposing to exclude all portable computing devices which have cellular voice capability, as defining smartphones/mobile phones is a challenging endeavor which would likely delay the development of Version 6.1. Any products which meet the definition of slate/tablet but contain cellular voice capability will remain out of scope in Version 6.1</p>
Mobile All-In-One		<p>A stakeholder stated that portable AIO products have experienced market growth during the 2013 holiday season. This commenter stated that several manufacturers have qualified these products under Version 5.2 under the desktop category and recommended that these form factors continue to qualify under desktops. A notebook must have a keyboard engineered for standard clamshell or two-in-one design while the keyboard is optional for portable AIOs. Portable AIOs are designed to be flexibility and limited portability but while in use, the product will remain in a permanent location due to the size and weight so it should not be considered a mobile device like a notebook or tablet.</p> <p>Another stakeholder supported the inclusion of mobile-all-in-one desktop computers under the category of notebook since they are able to be powered from an internal battery for over five hours and tend to include notebook style CPUs. This commenter did not believe it would be appropriate to establish definitions of limited portability versus portability. Also, they noted that there may be potential to separate these products from notebooks based on their large display size however, further research on power demand would need to be done.</p>	<p>EPA is proposing to include portable AIOs within the integrated desktop definition, as they share similar computing hardware and functionality.</p>
Non-energy attributes		<p>One stakeholder recommended that EPA revisit the Section 3.2 design for disassembly and recyclability for slates and tablets since the intent of the language was based on notebooks and desktops.</p>	<p>EPA is open to further discussion and would appreciate suggestions for how to modify the language and/or for existing standards to reference.</p>
Labeling		<p>A stakeholder recommended that permanent or temporary labeling requirements be optional or removed for slates and tablets due to their small form factors. Electronic labeling does not apply to slates and tablets since they are not turned off often and there are no system power settings on these devices. They recommended that labeling requirements state that the label could be on the product, packaging, or websites.</p>	<p>Option 6.1.1.2).b in the Partner Commitments allows for electronic labeling within the system power settings dialog window, but EPA has made exceptions on a case-by-case basis. EPA proposes to keep the above language but for slate/tablets to either (a) create case-by-case changes on a per stakeholder basis or (b) create a set of "standard exceptions" based on OS type which stakeholders may opt for, while still retaining the ability to create individual exceptions as needed.</p>
User Interface		<p>A stakeholder requested clarification on whether the user interface standard IEEE 1621 is applicable for slates and tablets.</p>	<p>EPA recommends that all computing products meet the IEEE 1621 interface standard when possible, but notes that this standard is not required as part of the certification process.</p>
Efficiency Criteria		<p>A stakeholder recommended that slates/tablets as well as two-in-one computers be open to all notebook categories and limits and not lumped into the Table 6 "0" category because:</p> <ul style="list-style-type: none"> • There is no easy way to define notebook processing capability since the architecture is no longer a differentiator. • There are performance, usage and power management differences between two form factors but the same rules don't always apply (e.g., a computer that meets the slate/tablet definition and marketed as a tablet could have the processing capability of a two-in-one). • It is difficult to articulate difference without research • Slates and tablets are no longer limited to a single architecture or OS. 	<p>EPA has considered stakeholder feedback on this issue and is proposing to allow slate/tablet devices to use Table 6 (base power allowances) in the eligibility criteria in the same manner than Notebooks currently do in Version 6.0.</p>

Certification Criteria	A stakeholder requested that EPA address power management for always-connected slates and tablets and to add a new column in Table 2: Power Management Requirements. Also, they requested that the TEC equation and mode weightings be updated for slates and tablets.	EPA has revised the power management requirements in Table 2 of the eligibility criteria, adding new requirements specifically for slate/tablet devices.
Certification Criteria	A stakeholder proposed slate/tablet mode weightings based on NPD Report: <ul style="list-style-type: none"> o Long idle: <ul style="list-style-type: none"> 90% (NPD study); o Short idle: <ul style="list-style-type: none"> 10% (NPD study) 	EPA is proposing that slates/tablets will use the same mode weightings as Notebook Computers, and those products without a distinct sleep mode use long idle in place sleep mode for calculating TEC. EPA acknowledges that different mode weightings may be ideal for slate/tablet products, but two complications prevent EPA from creating separate mode weightings at this time: 1) A combination of short development timeline for Version 6.1, and lack of usage data on slates/tablets, and 2) wanting to avoid penalizing slates/tablets with more processing capability from being able to compete with similarly powered Notebook Computers by removing the sleep and/or off mode component of their TEC calculation.
Battery Charging	One stakeholder supported the sunset of the Battery Charging Systems specification but recommended that other initiatives be set in this area during the development of the Version 6.1 Computer specification.	EPA thanks the stakeholder for this comment and can share that the final decision on the sunset of the ENERGY STAR BCS program was published on February 27, 2014. The program is officially in the process of being sunset at this time.
Other Considerations	A stakeholder suggested updating Appendix A with slates/tablets sample calculations. Another stakeholder recommended that the amendments to Version 6.0 only include the necessary adjustment for including slates and tablets in order to keep the development process short.	Because the Notebook eligibility criteria apply directly to slates/tablets, EPA does not see value in revising Appendix A as part of the Version 6.1 revision at this time.
Timeline	A stakeholder requested more specific dates for ENERGY STAR Version 6.1 specification development.	<ul style="list-style-type: none"> Draft 1: Release ~March 12th. Webinar: March 19th Draft 1 comments due: April 9th. Final Draft Test Procedure: Release ~beginning of April Final Draft Specification: Release ~early/mid-April Final Draft Comments due: End of April Final specification published: May 5th Version 6.1 Effective date: June 2nd.