Topic	Comment Summary	EPA Response
Categorization	One stakeholder expressed support for the expandability score, arguing that it was a slightly better indicator of system capability, particularly for lower and higher capability systems. A second stakeholder conditionally supported p-score on the condition that additional criteria for categorization is used to establish equitable base TEC levels. A third stakeholder supported simplified expandability score, noting that ENERGY STAR is well positioned to push a third metric due to its voluntary nature and leadership in the category.	EPA analyzed all of the data in the dataset against both p-score and expandability score and found that p-score best identifies leaders in energy efficiency. EPA has adjusted the p-score boundaries and reduced the number of categories in Draft 1, to improve this categorization system for ENERGY STAR. EPA did not receive any data that refutes the conclusions presented in the Discussion Guide and the webinar, which outlined the concerns the Agency had around expandability score for a leadership program. As such, EPA does not believe that there is enough benefit in transitioning to an alternative approach to warrant the additional complexity that this change would bring to the specification. EPA will continue to collect data on the expandability related fields and will review this again as part of the Version 9.0 specification revision process.
Mode Weightings	One stakeholder provided preliminary recommendations for mode weightings based on a product survey and reported plans to share additional data with EPA in advance of the publication of Draft 1. Two stakeholders expressed support of EPA's intent to adjust mode weighting but requested that EPA provide additional information regarding the dataset used to develop mode weightings to allow stakeholders to better assess the proposal. These stakeholders recognized that the data may contain confidential and sensitive information, but maintained that EPA could make additional information available without compromising confidentiality. Two stakeholders expressed support for including residential usage as well as enterprise usage while developing duty cycle mode weightings, citing the growth of consumer usage of desktop and notebook computers and the prevalence of residential applications in the installed base of client computers in the U.S. Two stakeholders commented on the proportion of systems enabling power management. Both stated that default-enabled power management was not disabled by the user in the majority of cases, but one was not satisfied with current progress and encouraged EPA to focus on strengthening power management provisions in Version 8.0. One stakeholder stated that ECMA-393 and Connected Modern Standby are still under industry review, and depending on complication and cost effectiveness manufacturers may pursue other solutions. One stakeholder requested that long-idle and short-idle remain as distinct modes in order to encourage manufacturers to continue to enable energy saving features in long-idle mode.	EPA received new mode weighting data from stakeholders comprised of over 700,000 individual desktop data points across multiple manufacturers, product types, user profiles (commercial & residential), and geographies, with very similar mode weightings across the dataset. This latest data allows EPA to separate the short and long idle components of the new proposed mode weightings for desktops, further refining the original values presented in the Discussion Guide. The scale and breadth of the latest data provides confidence that these values are representative of the aggregate current behavior of deployed desktop computers in the field. Absent any additional large scale data sources (ideally 50,000+ tracked products) that suggest that these values are not an accurate representation of the current desktop market, EPA will adopt these mode weightings. The Agency remains committed to ensuring that power management is a core part of the ENERGY STAR criteria and has kept the requirement that this feature is enabled as shipped. However, given the changes to the mode weightings, EPA has removed the incentives geared towards connectivity for desktop computers. It is the Agency's intent to adjust the notebook mode weightings in the next revision based on the data available.
Resume time from sleep	One stakeholder recommended removing the resume time latency target from the sleep definition, citing the variability of resume times across market segments.	EPA is maintaining the existing resume time latency requirements for all products in Draft 1. EPA welcomes additional product data representing products that have or could certify as ENERGY STAR that cannot meet the existing requirements. To this point, data previously provided on this topic has not made it clear that ENERGY STAR products have an issue meeting this requirement.
Treatment of non-traditional SSD options	One stakeholder recommended applying relevant CEC adders to M.2 devices and offered to provide definitions and initial data regarding additional forms of non-traditional based storage.	EPA is proposing an adder for M.2 based storage devices which aligns with the new SSD adder. This adder is intended for storage purposes only. EPA has not received data supporting adders for any other device type utilizing an M.2 port at this time.
Allowances	One stakeholder provided proposals for allowances to be applied to Desktop/Integrated DTs and Thin Clients. In addition, the stakeholder requested that EPA consider new adders for features including HDR, curved displays, non-traditional SSDs, 5G modem, and LAN >2.5GB.	EPA has reviewed the proposals for additional adders and has requested additional supporting data as part of stakeholder feedback to the Draft 1 specification for consideration in Draft 2.
General	One stakeholder expressed support of the timing of the Version 8.0 specification, stating that the revision was highly appropriate due to the rapid market developments in desktop computers.	EPA thanks the stakeholder for this support.
Test Procedure	One stakeholder requested clarification regarding the spinning of hard disk drives during short-idle testing and expressed interest in working with EPA to define a new test image for integrated displays.	DOE welcomes any input and data that would indicate concerns with the current test image, and what requirements should be looked at for a new test image.