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October 31, 2013

Via Email

Robert Meyers (Meyers.Robert@epa.gov)
Product Manager
ENERGY STAR for Large Network Equipment
U.S. Environmental Protection Agency

RE: Energy Star for Large Network Equipment (LNE)

Dear Mr. Meyers:

The Alliance for Telecommunications Industry Solutions (ATIS), on behalf of its Sustainability in Telecom: Energy and Protection Committee (STEP), is writing to provide input regarding the proposal by the Environmental Protection Agency (EPA) to develop an Energy Star specification for Large Network Equipment (LNE).

ATIS is a global standards development and technical planning organization that leads, develops and promotes worldwide technical and operations standards and solutions for information, entertainment, and communications technologies. ATIS' diverse membership includes key stakeholders from the Information and Communication Technology (ICT) industry – wireless and wireline service providers, equipment manufacturers, broadband providers, software developers, consumer electronics companies, public safety agencies, digital rights management companies, and internet service providers. ATIS is the North American Organizations Partner in the 3rd Generation Partnership Project (3GPP) and a significant focus of ATIS' work is directed at the development of IP Multimedia Subsystems (IMS)-based network and Long Term Evolution (LTE) technologies.

As an initial matter, ATIS notes its support for the views taken by the Telecommunications Industry Association (TIA) in its November 30, 2012 comments, on the scope and testing methodology for the draft ENERGY STAR Large Network Equipment (LNE) Specification Version 1.0. In these comments, TIA recommends that ENERGY STAR heavily rely and reference existing voluntary industry standards and test procedures related to energy efficiency for routers and switches. TIA also recommends that the EPA look to the latest Telecommunications Energy Efficiency Ratio (TEER) definition, a metric developed by ATIS that provides a reportable measure of energy efficiency for a variety of LNE, found in the most recent ITU-T and ATIS publications.

ATIS believes that two of its standards are particularly relevant to LNE energy efficiency: (1) ATIS' standard on *Energy Efficiency for Telecommunication Equipment: Methodology for Measurement and Reporting for Router and Ethernet Switch Products* (ATIS-0600015.03.2013); and (2) ATIS' standard on *Energy Efficiency for Telecommunication Equipment: Methodology for Measurement and Reporting – General Requirements* (ATIS-0600015.2013). These standards address a broad range of equipment including modular devices.

ATIS believes that use of these standards will facilitate the development and deployment of energy-efficient equipment, a view consistent with the view espoused by many of our stakeholders. ATIS further notes that these standards have been implemented by the industry and are updated as necessary to reflect equipment changes. As a result, ATIS has updated the aforementioned standards based on user experiences since the last round of comments received by LNE Energy Star EPA in November 2012 (<https://www.energystar.gov/products/specs/node/413>).

Finally, ATIS notes that STEP does not define energy efficiency limits for products but rather defines a metric to represent efficiency that is used to compare similar devices selected by prospective users. ATIS believes that, if the EPA were to define an actual limit, the number of devices for each must be reduced to such an extent that it would make the specification fragmented and limits would be set without a statistically significant base.

ATIS supports the goal of the EPA to drive the use of the most energy-efficient equipment on the market and believes that efficiency measurement methods should reflect the use of the equipment. If you have any questions or comments, please contact me at your convenience.

Best regards,



Thomas Goode
ATIS General Counsel

cc: Joseph Andersen, TIA Director, Technology & Innovation Policy
Ken Biholar, ATIS STEP Chair
Bon Pipkin, ATIS STEP Vice Chair
John Messina, ATIS STEP TEE Chair
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Jackie Voss, ATIS Manager, Global Standards Development
Nicole Butler, ATIS Committee Administrator