

## Comments on Working Document for Regulation of Ecodesign requirements on Networked Standby

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### General Comments

We are generally satisfied with the proposal and we believe it has the right approach for tackling the growing energy consumption connected to networked standby. We would recommend an adjustment of the proposal in a few important areas, which we detail in the following.

### Tiers and Levels

We recommend including a third tier taking effect from 1 January 2016 in order to set a long term target at a low consumption level. We think it is important to reduce the network standby as much as possible because networked standby functionality over time will be relevant for many appliances.

Technically it is possible to reduce the networked standby consumption to a very low level. It may however require major changes in design platform, chip technologies etc. By setting a long term target – five years from now – the industry can start take the requirement into their product development planning.

We believe it is possible achieving the following levels, which therefore are our recommendations:

	<b>Tier 1</b>	<b>Tier 2</b>	<b>Tier 3</b>
LoNA	4 W	2 W	1 W
HiNA	10 W	8 W	6 W

Comparing with the current proposal for regulation, HiNA tier 1, should be reduced from 12 W to 10 W and tier 3 should be included.

We further recommend to consider the possibility to let tier 1 be effective from 1 January 2013, tier 2 from 1 January 2014, and tier 3 from 1 January 2016.

### Consumer Information

We believe many consumers are not aware of the possibly high consumption in networked standby. We think it is fair towards the consumers to provide them with information in the manual about:

- Power consumption at networked standby (Watt) (at test conditions)
- Descriptive text about how the power consumption at networked standby can increase if more connections are active compared to the test conditions
- Resume time for LoNA (sec)
- Instructions on how to disable possible unused network ports and the savings achieved

We recommend inclusion of a requirement on this consumer information in the regulation.

### Description of Connections

We recommend an edition of the descriptive text regarding connections in order that it should include active connections only.

The text should be edited as follows marked with yellow:

- Chapter 2 (c): “Products that have a standby mode as defined in Regulation (EC) 1275/2008 shall comply with the requirements for this standby mode if no network port is connected **and active** or, for wireless network ports, the network ports are **switched off are not connected and active**”.

The reason is that there could be a physical connection for a disabled network port and that there could be a wireless network port which is on but not connected to an access point and the connection is not active. In both cases, the standby mode requirements should apply.

### **Main and/or HiNA Switch**

We will recommend requiring a main switch for the product allowing the consumers to switch off the product.

Furthermore, there may be products which fall under HiNA but where the consumer in reality does not need the product to resume within 1 second. In order to provide the consumer with the option to reduce the standby consumption, a switch that disables HiNA letting the product be in LoNA is recommendable.

### **Network Port Indicators**

It is preferable to require network port indicators with light on for enabled network ports in order that the consumer knows that the ports are consuming energy and can thereby decide to switch them off if not needed.

### **Verification Procedure**

We recommend modifying the verification procedure to stimulate the manufacturers to disable network ports before shipping, unless the ports are used by the majority of the consumers. Typically, the consumers do not change settings when they receive the products. The risk is that ports are active and consume energy without being used.

The recommended modification is to change the text in the working document, page 5, the last section:

“The product is tested as shipped. Where the product has one or more cable connection ports available, for each type of cabled network connection one port is randomly chosen and that port is connected to the appropriate network complying with the maximum specification of the port.”