ORGALIME POSITION PAPER ON

Draft Definition Document for Standby and Off-mode Losses
(EuP study Lot 6, Task 1)

Brussels, 6 October 2006

The contractor of the preparatory study for lot 6 „Standby and off-mode losses", Fraunhofer-Institut für Zuverlässigkeit und Mikrointegration (IZM), has published a Draft Definition Document for Standby and Off-mode Losses (Lot 6, Task 1) for broad discussion and commenting.

Orgalime welcomes this and hereafter gives its comments before any further activities, such as the definition of base cases etc., are undertaken. With this approach it is assured that basic definitions on Standby or Off-mode Losses can be clarified and a clear differentiation can be reached.

Definitions

Paragraph 1 of the paper gives a comprehensive survey of existing definitions to Standby and explains the differences of the various approaches and standards based on. Finally, IZM determines an own definition to Standby und Off-mode Losses.

We would like to propose to include the following expressions in the definitions:
Page 9, 10: Definition of „Idle" and „Idle losses"
Page 17: Definition of „throttling"
Page 17: Implementing of ACPI-Stati S1, ..., S5 für Personal Computer
Concerning the definition of testing on open systems (e. g.: in the area of IT equipment) the basic configuration of the product delivered from manufacturer should be determined. For these products a wide range of configuration adjustments is possible.

In connection with test standards for the "Energy Star", IZM states that generally IEC 62301 (Household electrical appliances) is applied as reference for the majority of test standards for power consumption in Standby. In case of adapting this standard for testing of products, which are not covered by household electrical appliances, this should be substantiated.

Functionality

IZM proposes for definitions and further investigations to implement the "functionality approach" for the studies on standby. The different operating modes are determined as functions, whereby every mode, which would not be an "operating mode" or an "off-mode", would be defined as "standby". Apart from the core questions to the consequences of such a functionality approach, we have concerns e.g. with the grey area "network background communication". We further see the need for discussions in the field of base cases.

Scope

The IZM draft definitions paper mentions product areas, which are covered by other preparatory studies or lots: Those „vertical studies" are e.g.:
- PCs and computer monitors (Lot 3)
- Imaging equipment: Copiers, faxes, printers, scanners, multifunctional devices (Lot 4)
- Consumer electronics: Televisions (Lot 5)
- Domestic dishwashers and washing machines (Lot 14)

Orgalime expects that further investigations of products in the area of standby and off-mode losses, which are already covered by such vertical studies, will take place there and not within lot 6. This is notably true for additional product specific functions, which may not have been listed by IZM in its lot 6 horizontal approach (as mentioned page 17). This is also valid for any ranking of relative importance of functions for each product. Last but not least, setting up detailed figures for each service function running in stand-by or off-mode phases can be properly discussed only with careful consideration of each product specific design and conditions of use: a given service function (e.g.: clock) may be the only one running (e.g.: oven) or be in addition to a basic function continuously running (e.g.: temperature controlling of a refrigerator). Power consumption may thus consequently greatly differ from one product to another for an equivalent function.

As a result, Orgalime sees the necessity for a clear substantiation of the study's respective content to avoid overlaps and inconsistencies.