

California Energy Commission

**DOCKETED**  
**12-AAER-2A**

TN 71729

JUL 29 2013

# Proposal for Standards – Consumer Electronics (Docket #12-AAER-2A), Networking Equipment

## *Appliance Efficiency Standards and Measures*

for California Energy Commission's Invitation to Submit Proposals

### Authors:

The Information Technology Industry Council ("ITI"; <http://www.itic.org/>) and the Technology Network ("TechNet"; <http://www.technet.org/>).

The contacts for our organizations are: Christopher Hankin, 202-626-5753, [chankin@itic.org](mailto:chankin@itic.org) and James Hawley, 916-447-4099, [jhawley@deweysquare.com](mailto:jhawley@deweysquare.com).

### Proposal:

ITI and TechNet are in general support of the comments submitted by the Telecommunications Industry Association that: (a) networking equipment should be excluded from the scope of the products under consideration by the Commission, and (b) the Commission should also make clear that commercial network infrastructure equipment is excluded from the scope of the potential rulemaking.

Networking equipment products and markets are evolving rapidly. Products are diverse, complicating easy categorization. In such an environment, the potential costs of regulatory action are likely to be especially high relative to the benefits that could be obtained through regulation.

Such complexity has bedeviled the US EPA and stakeholders in trying to draft the Version 1.0 ENERGY STAR Small Network Equipment (SNE) Specification. Despite a two-year process with stakeholders, the final draft specification still does not adequately segregate corporate or enterprise class networking equipment from consumer class networking devices.

In particular, the draft ENERGY STAR SNE specification provides no power adder or exclusion for products that support specific capabilities for vertical segments or government required security features such as FIPS 140-2, HIPAA, and Payment Card Industry (PCI). These features are being incorporated into networking equipment instead of in dedicated security devices in order to reduce cost, complexity, and energy consumption in corporate campus environments. The addition of these features drives significantly higher power consumption in these devices than the consumer class products found in the retail sales outlets.

Adoption of a mandatory SNE spec by California could eliminate these as products in California, forcing the industry to revert back to dedicated security devices and potentially increasing the energy consumption in these campus environments as well as potentially eliminating the ability

of California companies to continue their current businesses.

Whereas, through initiatives such as the Obama Administration's Green Button Initiative, which allow consumers to use energy data to better manage household energy use, networking equipment has the potential to play a key role in helping households achieve significant overall reductions in energy use.

Our organizations are interested in working with the Commission to scale the deployment of home energy networking functionality, perhaps through the use of incentives. But we believe that the Commission should refrain at this time from expanding the product scope in the OIR, so as not to inhibit device and network functionality, or lose potential efficiency gains made possible by home or business area networking equipment.