Industry perspectives on the proposed EU Ecodesign directive amendment of 1275/2008 (lot 6) with networked standby requirements (Lot 26)

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Lot 26: main definitions

- ‘Network port’ means a wired or wireless interface of the network connection at the equipment through which the equipment can be remotely activated.
- ‘Networked Equipment’ means equipment that has the ability to be connected to a network and has one or more network ports;
- ‘networked standby’ means a condition from which the equipment is able to resume a function via a remotely initiated trigger via a network connection;
- 3 classes of products:
  1) “HiNA equipment”: equipment with the functionality of router, NW switch, hub, modem, wireless NW access point, VoIP phone, Video phone
  2) “Equipment with HiNA functionality”: equipment with the functionality of a router, switch, WAP as side function
  3) “LoNA equipment”: all the rest of networked equipment

Note:
- Need to declare in the test report
  - which interfaces are network ports. No network port = not network equipment so it must comply with Lot 6
  - if product is HiNA or equipment with HiNA functions. Otherwise it is LoNA
Lot 26: main requirements

<table>
<thead>
<tr>
<th>Within 20 minutes*</th>
<th>Tier 1 (1\textsuperscript{st} Jan 2015)</th>
<th>Tier 2 (1\textsuperscript{st} Jan 2017)</th>
<th>Tier 3 (1\textsuperscript{st} Jan 2019)**</th>
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<tbody>
<tr>
<td>HiNA</td>
<td>12 W</td>
<td>8 W</td>
<td>8 W</td>
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<tr>
<td>Eq. with HiNA</td>
<td>12 W</td>
<td>8 W</td>
<td>8 W</td>
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<tr>
<td>LoNA</td>
<td>6 W</td>
<td>3 W</td>
<td>2 W</td>
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<tr>
<th>Tier 1</th>
<th>HiNA</th>
<th>Eq. with HiNA</th>
<th>LoNA</th>
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<td>January 1st 2015</td>
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<td>Must be able to deactivate wireless network port</td>
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<td>When all network ports are <strong>deactivated</strong> then standby (if it exists) needs to be &lt;0.5W</td>
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<td>When all network ports are <strong>deactivated</strong> then APD into &lt;0.5W, unless inappropriate</td>
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<table>
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<td>When all network ports are <strong>disconnected</strong> then standby (if it exists) needs to be &lt;0.5W</td>
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*Default time when placed on market
** Subject to detailed review in 2016
Lot 26: verification procedure

1) The unit is put in the On mode, default as shipped.
2) For each type of network port:
   • Step 1: connect 1 randomly chosen network port to the appropriate network,
   • Step 2: deactivate/disconnect all network ports,
   • Step 3: let the unit to go into the NW standby mode and check that the power is below NW standby target after 20 minutes
   • Step 4: using a NW trigger, check that the equipment has woken up from NW standby to On mode
3) Repeat steps 1-4 for all other types of network interfaces

Equipment compliance:
• For each NW port type, the measured power in NW standby must be below the target defined by the relevant tier and NW availability type of equipment
Lot 26: industry acknowledges

- NW standby supports the reduction of energy consumption of networked devices
- Endorsement of industry to further develop products which have more intelligence on energy & sleep modes
- Gives industry a long term image/goal, but Tier 3 a step too far
- Introduces the idea of having dynamic products, where interfaces/network ports are switched on/off when needed/not needed
  - customer might never use a port -> permanently deactivated ports
  - night mode/ periods of inactivity
  - when cables are disconnected
- Gives manufacturers different possibilities/options to comply with targets
  - Choose between complying with lot 6 or lot 26
  - ports can be deactivated when equipment is placed on the market
  - auto deactivate ports when disconnected
- As it is linked to CE mark, everyone has to comply, no free-riders
- At least certain product groups are excluded (TV, computer,..) from this horizontal measure and addressed in their own specific measure
Lot 26: industry has concerns

- The regulation is **horizontal** and is not linked to device functionalities and NW equipment. It could be very easy or very difficult to meet the NW standby power targets.
- The **scope definition** is not right; it contains professional products which either cannot meet the targets or which it doesn't make any sense to enter network.
- As it is linked to the CE mark, this regulation focuses only on the product energy consumption, not on what happens on the network.
- Total energy versus power discussion, **holistic approach** is better.
- **Historical naming of definitions** could lead to wrong policy & confusion:
  - “Availability” is used instead of “place in the network”
  - “HiNA” is used instead of “networking equipment”
  - “LoNA” is used instead of “edge device”
  - “networked equipment” is used for all products (HiNA, LoNA) with network ports
  - for HiNA equipment: “Network Standby” is used instead of Efficient Idle
- Considerable **ambiguity** and need for interpretation in the regulation understanding may lead to confusion in industry and in market surveillance.
- Lot 26 **verification procedure** motivates manufacturers to optimize the device power consumption when:
  - only 1 network port of the device is connected
  - and not when several WAN and/or LAN ports are connected which is a more realistic use case e.g. for a home GW
- **Tier 3 targets**, inserted at last moment without stakeholder consultation, might kill some product families.