

# **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

Within 20 minutes*	Tier 1 (1 <sup>st</sup> Jan 2015)	Tier 2 (1 <sup>st</sup> Jan 2017)	Tier 3 (1 <sup>st</sup> Jan 2019)**
HiNA	12 W	8 W	8 W
Eq. with HiNA	12 W	8 W	8 W
LoNA	6 W	3 W	2 W

Tier 1 January 1st 2015	HiNA	Must be able to deactivate wireless network port	When all network ports are <b>deactivated</b> then standby (if it exists) needs to be <0.5W	
	Eq. with HiNA			When all network ports are <b>deactivated</b> then APD into <0.5W, unless inappropriate
	LoNA			
Tier 2 January 1st 2017	HiNA	Must be able to deactivate wireless network port	When all network ports are <b>disconnected</b> then standby (if it exists) needs to be <0.5W	
	Eq. with HiNA			When all network ports are <b>disconnected</b> then APD into <0.5W, unless inappropriate
	LoNA			

\*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 compliancy:

- 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