

September 08, 2004

Dell Inc.

Page 1, A

Does the specification apply to external power supplies that power a system that has a primary function of charging batteries? (e.g. Laptop computer)

Page 2, 1ST bullet:

Is the EPA going to consider adding efficiency requirements on DC/DC motherboard regulators?

Page 3, Letter "D"

If the power supply name plate specifies an input operating voltage range of 100VAC to 240VAC are manufacturers required to meet the required efficiency levels over the entire range or just 120VAC & 240VAC? (It is recommended that the efficiency be required only for the typical voltage that the power supply will operate from.)

Page 4, The box in the middle of the page

Can the EPA provide additional data about regarding the remarks on capturing the upper 34.7% and 21.6%. Specifically it would be helpful to know what markets and power levels the data was generated from. Can you also provide a pareto chart of efficiency based on business segment and power level?

Page 5, Top Box

Requiring PFC dollar for dollar will likely result in a lower efficiency than a non-PFC counter part. Doesn't this make the PFC option counter to the document's purpose? (e.g. higher efficiency)

In draft 2 of the document the EPA notes that this was not true (the lower efficiency). Can you provide the data and physics to substantiate this claim?

Page 6, A

Calls out compliance to UL1012 & UL1310. Presently our products meet UL6950, Is this sufficient?