Section 5.1.2

Suggest revising A1 to A2 ASHRAE standard.

Section 5.3.3:

Suggest revising table to reflect change in 5.1.2

Section 7.2:

Although this is an optional criterion, use of LCA calculations to demonstrate equivalent or less impacts for alternatives to the PCR/WEEE targets would be preferred. Depending on the manufacturing location, local supply chain logistics, and local material availability, impacts for some materials with lower PCR or WEEE content might be lower overall than for the targeted PCR/WEEE content.

Section 7.2.2:

Increasing PCR for REMs would increase cost in the current materials supply chain.

Section 8.1.3

Suggest allowing LCA data in support of alternatives to targeted recycled fiber content percentages.

Section 8.1b

Suggest clarifying the requirements for baseline vs 10% reduction in packaging materials.
Comments on Section 9:

9.1.4:
Manufacturers are generally aligned with efforts to recover and recycle materials from products. Publishing information in support of recycling and materials recovery is fundamental to enable those efforts. However, publishing manuals that enable end user or technical repair outside of authorized repair technicians and authorized repair and refurbishment is problematic. Repair of server products involves high voltages, physical hazards, and hazards from accumulators/batteries. Publishing repair manuals is generally not supported by manufacturers due to the inherent risk in these activities. Documentation of troubleshooting would be confined to non-hazardous, low risk troubleshooting.

9.6.1:
While this criterion is optional, the requirements would be extremely challenging to meet without exposing the manufacturer to liabilities. In addition, since specific repair processes/routings are the intellectual property of refurbishment third parties, manufacturers are typically unable to provide full details of effective refurbishment other than “level 1” repairs, typically involving non-physical repairs.

Since components are often configured specifically to enable or support specific machine-configuration specific functions, most component replacements will require OEM-specific components. As an example, while almost any SATA interface disk drive will function in any SATA port, using disk drives designed for desktop applications would result in reduced function and early failures. While the component replacement “functions,” the component will not function in support of OEM specs.

Section 11.2.3:
Public disclosure of LCA inventory data will be hampered by the proprietary nature of third party data sources. Manufacturers often rely heavily on third party resources for LCAs, and will not be allowed to publicly disclose those data. Suggest the verbiage me modified to require disclosure of only those primary and secondary data that are not restricted by NDA or BCI restrictions.

Section 13.3.2:
Names of suppliers are considered business confidential information within the electronics industry. Disclosure of top supplier names (by spend or by volume) would violate most manufacturer’s BCI restrictions. Suggest deleting requirement for naming suppliers, and related requirements (links to supplier GRI, etc.)