Organisation: DIGITALEUROPE Name: Sylvie Feindt Date: 4 August 2014

Study to establish the Ecodesign Working Plan 2015-2017 implementing Directive 2009/125/EC

Document comment relates to: 4 August 2014 - Draft Task 3 Report: Base stations

Section in document	Page number	Topic	Comment	Proposed change
Task3 report PG03	37-44	Base Stations	Data and information used in the report stems from different sources, which makes it difficult to have a clear understanding of the present and future market/technologies situations. This point is partially linked to the definitions comment below.	Remove the product group from the work plan.
			 The telecom industry has a well-established and standardised definition for systems, components and interfaces. "Base station sub system" as defined in the draft report is an artificial creation which in practice doesn't exist. It is therefore not surprising that for the draft report no criteria documents could be found. 	
			 All essential telecom products have currently an ETSI energy efficiency standard either under development or already finalized. Further standards may be developed in the course of ETSI's execution of the standardisation mandate M/462. This has not been taken into account in the draft report. 	
			 The EU Code of Conduct energy consumption of broadband equipment defines current and future power limits for radio base stations and broadband access equipment. This has not been taken into account in the draft report. 	

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			 The telecom industry is actively addressing the energy consumption of mobile networks - improvements of hardware, site solutions, and solutions on network level - as this has been a competitive issue since a number of years. 4G/LTE is much more energy efficient than previous technology generations, and replacement is taking place/will take place on the basis of market/customer needs – as opposed to legal requirements. 	
			In addition, base stations cannot really be separated from the mobile phone industry. Many of their savings outlined above are enabled by base station features. As there are both competitive pressure and standardisation activities driving continuous improvements in energy efficiency in mobile networks, and as base stations subsystems is not even a defined product DIGITALEUROPE calls for base stations to be removed from the list.	