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To Whom It May Concern:

Thank you for the opportunity to comment on the SASB exposure draft standard for the technology and communications sector (SICS #TC0101). The Green Electronics Council (GEC) is the non-profit organization that manages EPEAT, the leading global IT eco-label. EPEAT is referenced within this standard and GEC's has several technical comments regarding how EPEAT is referenced. GEC has three comments on the draft standard.

1) TC0101-08 uses the term "EPEAT Certification". The conformity assessment process that EPEAT uses to validate claims is not a certification process. This metric should instead refer to "EPEAT Registration"

2) The description for the accounting metrics associated on page 21 states that there is no EPEAT category for mobile phones; an EPEAT category for mobile phones was added in July 2017, so this statement should be removed.

3) The description of what it means to meet the requirements (page 21, line 36) of EPEAT does not accurately describe EPEAT's conformity assessment process and should be modified to read "A product meets the requirements of EPEAT if it appears on the EPEAT Registry (www.epeat.net), or the registrant can otherwise demonstrate that the product meets these requirements."

Please feel free to contact me with any questions regarding these comments.

Best regards,
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