

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
AIR AND RADIATION

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Dear ENERGY STAR[®] Imaging Equipment Stakeholder:

EPA welcomes your input on the attached **Draft 3 ENERGY STAR Specification (Version 1.0) for Imaging Equipment Products**.

All manufacturers and other interested parties are encouraged to review the Draft 3 ENERGY STAR specification (Version 1.0) for Imaging Equipment and provide comments by **April 7, 2006**. Please direct any questions or comments to Katharine Kaplan Osdoba, EPA, at osdoba.katharine@epa.gov or Erin Trager, ICF Consulting, at etrager@icfconsulting.com. In an effort to keep the specification revision process as transparent as possible, EPA will post any comments it receives from stakeholders on the ENERGY STAR Product Development Web site at www.energystar.gov/productdevelopment, unless the comments are marked to remain confidential.

The attached Draft 3 specification includes the following key changes:

- The definition for Standby in Section 1 has been updated per discussions at the February 14th stakeholder meeting as well as per the ENERGY STAR Imaging Equipment Draft 2 (Version 1.0) Specification Stakeholder Comment Response Summary, distributed on February 24th. The definition now mirrors the IEC definition for Standby.
- Both the definition for the term Digital Front-end (DFE) and the manner in which products with physically- and functionally- integrated DFEs are addressed within the Typical Electricity Consumption (TEC) and Operational Mode (OM) approaches have been updated. Key features for DFEs have been added to the definition, and the approach of excluding DFE power consumption is now applied to internal as well as external DFEs.
- Continuous Form products are no longer categorized separately and now are addressed within the existing Size Format categories for Large-format, Small-format, and Standard-size format imaging products.
- The duplexing requirements provided in Section 3 have been changed to optional at the time of purchase for mid-speed range products per discussions at the February 14th stakeholder meeting. In addition, the requirements now apply to products that use Solid Ink marking technology in addition to those that use Electrophotographic.
- The TEC eligibility criteria in Section 3.A have been updated in response to stakeholder input in an attempt to better address mid-speed monochrome copiers and MFDs.
- The default-delay times to Sleep mode proposed at the February 14th meeting for OM products have been revised in response to stakeholder feedback such that they, in some cases, reflect longer default delay times, and are now incorporated in Section 3.B. A default-delay-time table was also added for mailing machines.

- Updated Standby requirements for OM products are now provided in Table D in Section 3.B. The levels mirror FEMP requirements for Standard-size products with and without fax capability and include an additional allowance for products with this capability.
- Clarification has been added to Section 4.B regarding the manner in which qualified product data should be submitted to EPA for models that are sold as standard in multiple configurations. If a single product model is offered in the market in multiple configurations, the partner must test all configurations of the model, but may choose to report the test data for only the highest configuration available.

This draft also includes revised eligibility criteria for OM products based on a refined “functional adder” approach. Because EPA’s dataset for many of the products addressed by the OM approach showed no direct correlation between the power a product uses in Sleep and the product’s claimed speed, the traditional approach of allowing more power for faster products is no longer supported. As a result, the functional-adder approach was proposed as an alternative. This approach recognizes that products offering more functionality require more power.

This methodology was first proposed at the October 2005 industry stakeholder meeting, and subsequently developed in collaboration with industry stakeholders over a period of months following the meeting. Based in part on discussions with industry experts, EPA proposed a set of functions, or functional adders, and corresponding power allowances in the Draft 2 specification, which were then discussed at the February 14, 2006, stakeholder meeting. Following the meeting, several manufacturers provided EPA with additional data identifying functional adders present on their products, which EPA compared to reported Sleep values and used to develop the eligibility criteria presented in OM Tables 1 through 8 in this Draft 3 specification. EPA believes that the functional-adder approach allows manufacturers to strive for superior energy efficiency, represented by the ENERGY STAR mark, and enhanced functionality for their imaging products.

This draft specification, as well as an updated Draft 2 Stakeholder Comment Response Summary will be made available on the ENERGY STAR Web site at www.energystar.gov/productdevelopment in the next few days. The updated response document includes additional comments that were not included in the initial distribution. EPA also intends to distribute a Supplemental Rationale to explain the approach and results of the functional-adder analysis that informed Section 3.B. of the Draft 3 specification within the next few days.

Thank you in advance for taking the time to review Draft 3 of the ENERGY STAR specification for Imaging Equipment and for your continued support of ENERGY STAR.

Best Regards,



Katharine Kaplan Osdoba, U.S. EPA
ENERGY STAR for Office Equipment

Attachment: Draft 3 ENERGY STAR Program Requirements for Imaging Equipment (Version 1.0)