

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



OFFICE OF
AIR AND RADIATION

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As you know, EPA released a Directional Draft on February 10 as part of the process of updating the ENERGY STAR specification for imaging equipment. This letter is intended to update you on how EPA believes the process will proceed over the next six to 12 months. This letter first provides a brief background on the update of the specification, then it outlines key events and steps that EPA envisions unfolding between now and the adoption of a final specification.

EPA began laying the groundwork for revising the imaging equipment specifications in 2002. The current specifications have been in effect for four to seven years, depending on the product. Imaging technology has advanced significantly since the late 1990's and it seemed possible that significant additional energy savings could be achieved across these products while maintaining product performance and features.

Other issues also have surfaced as a result of the design of the original specifications. As stated in the Directional Draft, concerns over low enabling rates for imaging products, relatively infrequent use of low power modes for some products, and the opportunity to achieve additional energy savings have prompted EPA to consider how these products use energy during power states other than power management modes. Evaluating a product's Typical Electricity Consumption (TEC) may be one way to ensure energy savings are realized in the field, while still providing manufacturers flexibility to design their products to enhance performance and energy efficiency. Before deciding to pursue this approach in a specification, EPA will need to work with industry to determine:

- If TEC can be accomplished without sacrificing product performance;
- If TEC will yield greater energy savings than a specification focused on low power modes; and
- If the additional time and resources associated with developing a TEC specification is warranted for all or some products.

Setting an ENERGY STAR specification involves an assessment of product energy-use in a consistent, repeatable way so that the top performers (roughly the top 25%) can be identified and differentiation of energy saving products can occur in the marketplace. Within the next few weeks, EPA will provide industry with a draft test procedure for further evaluating the Directional Draft's proposed TEC option and for eventually measuring TEC, if that approach is pursued. Feedback on this procedure will be accepted and revisions, if necessary, will be made through the summer so that a completed test procedure can be available by the fall. Test data gathered using this test procedure will be evaluated by EPA to confirm whether a TEC approach is consistent with ENERGY STAR guiding principles (which can be found at

www.energystar.gov/productdevelopment) and as a basis for setting a performance level in a first draft specification, as appropriate. The timing of the first draft specification will be contingent on how much time is required for data collection.

In addition to collecting and evaluating test data, EPA will hold stakeholder meetings as part of the ENERGY STAR imaging equipment specification revision process. The first such meeting will be held on **Wednesday, July 14** in Washington, DC (meeting details forthcoming). At this meeting, EPA will summarize Directional Draft comments received to date, further explain our rationale for considering a TEC approach, gather additional feedback from stakeholders, as well as discuss a timeline for the revision process.

As the specification development process proceeds, EPA will continue to refine the energy performance requirements consistent with ENERGY STAR principles. Once a performance specification is determined, EPA will take product design and manufacturing cycles into account when setting an effective date.

Stakeholders are encouraged to share their feedback with EPA. Industry participation is critical to developing a meaningful specification and to the overall success of ENERGY STAR. All imaging specification revision information is posted on the ENERGY STAR Web site at www.energystar.gov/productdevelopment for your review.

Thank you for your continued support of ENERGY STAR. If you have any questions or wish to comment on the revision process, please feel free to contact me at hershberg.craig@epa.gov or (202) 343-9120.

Regards,

A handwritten signature in black ink that reads "Craig Hershberg". The signature is written in a cursive, slightly slanted style.

Craig W. Hershberg
ENERGY STAR for Office Equipment and Consumer Electronics