

Comment from METI on  
2nd Draft - ENERGY STAR IE Specification (Version 1.1)

1) Product speed

It is recommended to include a line explaining that the product speed (ipm) referred in this specification is monochrome speed, even for color products. Although the statement is already provided in both TEC and OM test procedure documents, it should be also clearly included in the specification especially under the definition of product speed (page 8) and the duplexing requirement (page 11).

2) Maximum claimed speed and paper size

According to product speed definition in the specification, “if the maximum claimed speeds differ when producing images on A4 or 8.5”x11” paper, the higher of the two shall be used.” On the other hand, under paper specification in the test condition document, there is a line stated that “...the paper size and basis weight shall be appropriate to the intended market.” It seems that there is a discrepancy between these statements.

Given a model A, which is capable of A4 and 8.5”x11” paper and also which is shipped to both US and Japan. If its product speed for A4 is faster than for 8.5”x11” paper, will the manufacturer use only A4 speed and A4 papers in the evaluation for ENERGY STAR qualification? Otherwise, this model A shall be evaluated with product speed and paper size which are relevant for each market.

3) Manufactured date of IE products covered this specification

On page 10 through 11, requirements for IE products accompanied with EPS and/or DFE are provided. Line 408 and Line 413 say that “an imaging equipment product manufactured after July 1, 2009” is required to meet these requirement. Is it a typo and to be “on and after July 1, 2009”?

4) Clarification about the machine delay time

In the default delay time requirement (page13), OM products are required to be shipped with a maximum machine delay time which shall not be over 4hours. It also provides that the maximum machine delay time is only adjustable by the manufacturer with internal invasive product manipulation.

Under this provision, are the manufacturer allowed to change the maximum machine delay time to be over 4hours after shipment upon the user’s request? In addition, what are the examples of internal, invasive manipulation referred here?

5) Addition of Functional Adder Allowances

Line 515 on Page 14, there is a line that manufacturers “may apply as many Secondary adders as present”. With this expression, manufacturers may read it as if they do not need to apply all secondary adders as present; specifically the minus allowance for PC-based system potentially dare not to be applied. Thus, the line is recommended to be revised.

#### 6) Functional adder to which allowances are applied

Line 539 on Page 16, there is a line explaining that manufacturers “should consider only the adder types that are available on a product in its as-shipped configuration” when applying allowances. Do these “available” adders include functions which are already equipped on the product but not enabled (need to be turned on when use) as a default? Otherwise, the language just refers to a function which is both equipped and enabled as shipped default.

#### 7) Power factor requirement for internal power supply

At the bottom of Page 18, power supply efficiency requirements are provided for DFE using internal power supply. Here, power factor of the internal power supply is required to be over 0.9 ( $>0.9$ ). However, it must be 0.9 or larger ( $\geq 0.9$ ) as it is stated that this requirement is referring to the internal power supply efficiency requirement specified in ENERGY STAR Computer Specification version 4.0. Please clarify which requirement is correct.

#### 8) Voltage of reporting data

An issue about 230V reporting data is mentioned in Section 7 (page22). From the perspective of safety and quality control, it is often the case that manufactures are required to test their products at voltage relevant to the intended market. Thus, METI asks for further careful consideration and review on this issue by implement agents, partner manufactures and other interested parties.