

August 6, 2008

Christopher Kent, EPA Product Manager
ENERGY STAR Product Specification Development
U.S. Environmental Protection Agency
Washington, DC 20460

Dear Christopher,

Thank you for the continued dialogue on the Imaging Equipment draft Tier 2 specifications. Xerox believes that the program success to date is a reflection of its comprehensive and transparent stakeholder engagement process. The Energy Star program's success will continue so long as stakeholders continue to provide input in a meaningful way and decisions continue to be made in a manner that is understandable to all.

The following represents Xerox's feedback based on the DRAFT 2 imaging equipment specifications.

Separate Standards for Less Mature Technologies

Xerox supports looking at a broader mix of energy related impacts (*i.e.*, embodied energy, packaging, consumables). Xerox proposes that a working group be assembled to develop measures that align with ENERGY STAR guiding principles. Additionally, in the short term for tier 2, Xerox would like to propose a few ideas to incorporate within the specifications ideas on how best to address less mature/new printing technologies that have other energy related benefits.

Less Mature Technology Proposal

Less mature can be defined as those technologies used in products with:

(a) ≤ 0.5 million units sold per year; **and** (b) ≤ 3 OEMs employing the technology in their product lines.

Two possible ways that Energy Star could treat less mature technologies include:

- 1) Allow less mature/new technologies to certify to previous specifications (Tier 1 in this case). This would allow technology innovation and give credit to these technologies that have other

environmental benefits until a working group can develop a comprehensive strategy to address these issues.

Or

- 2) Allow less mature/new technologies an additional functional adder:
 - a. Color printers: Tier 2 (draft 2) + 2 kwh/wk
 - b. Color MFPs: Tier 2 (draft 2) + 3 kwh/wk

This would have the effect of encouraging technology innovation and give credit to these technologies that have other, additional environmental benefits until a working group can develop a comprehensive strategy to address these issues. Absent a different treatment for less mature technologies, Energy Star will have the deleterious effect of discouraging technologies with environmental benefits, and amount to picking winners and losers in the marketplace of environmentally sound approaches to technology.

Specifications

Xerox appreciates the effort EPA has made to develop a more complete database for Tier 2 specifications. However, since the Energy Star program has been in effect for many years, the effort to reduce office equipment's energy consumption is reaching diminishing returns. Accordingly, Xerox believes that the data demonstrates that combining products such as copiers, printers and fax machines into the same category may be creating undue challenges for printers to meet the program's specifications. Since the use and sale of copiers and fax machines have declined significantly and are projected to continue to decline in the future, Xerox would like to investigate creating the TEC 1 and TEC 2 specifications on printer data. Xerox would like to work with EPA by investigating how EPA drew the specifications for TEC 1 and TEC 2. Can EPA provide Xerox with this detailed information to determine if printers are inappropriately challenged by being included with fax machines and copiers?

Digital Front End (DFE) Updates (line 321)

Xerox supports the changes to the digital front end specifications. Xerox continues to communicate with the DFE work group and will provide comments as requested for DFE documentation proposal on August 8.

Imaging Equipment Scope (line378)

While Xerox supports initial language to ensure production products are out of scope, Xerox feels there still needs to be a dialogue with companies in those markets. Xerox proposes a working group be assembled to ensure agreement on the language.

Reporting Data at 230V (line 778)

Xerox supports the decision that, for those products marketed in different markets (one of which includes a 230V market), data from testing at the 230V level should be acceptable for all markets. This would reduce testing costs for manufacturers (and still meet ENERGY STAR requirements).

Expanding Duplex Requirement (line 783)

While Xerox understands the interest in expanding the duplex requirement, our own research has shown that this is highly tied to consumer preference rather than machine capability. If EPA forces customers to duplex through ENERGY STAR it can result in their disabling duplexing all together, or, worse, customer dissatisfaction with ENERGY STAR products. EPA would best address the need to increase the use of duplexing by campaigning to inform customer behavior. Xerox is a leader in duplexing technology as well as promoting its use, and will continue to help in this campaign.

Revising TEC Procedures (line 789)

While Xerox supports revisions to the test procedure for future specifications, it is important that products on the market be grandfathered to the current procedure to avoid making manufactures re-test and re-certify existing products to meet the specifications. Additionally, Xerox has a proposal (“the Weekend Timer Proposal”) detailed below that would not require a new procedure, but could help more accurately represent actual usage to the customer.

Weekend Timer Proposal:

Under the current TEC test methodology, if a product has a feature allowing for it to enter an additional reduced power mode on specified days (e.g., Saturday and Sunday), the additional power savings cannot be realized. Accordingly, Energy Star does not account for, and therefore does not encourage, such an important energy saving technology. Xerox proposes that if such a feature is enabled in a product, manufacturers be permitted to subtract the additional weekend power savings from the products' measured TEC total before comparing it to the applicable TEC criteria - (e.g. Product final TEC = [Product Measured TEC] - [48 hours (weekend time) x [(weekday sleep mode power) - (weekend sleep mode power)]). This proposal is similar to the DFE allowance and it would not require a change in the test procedure. Further, such an allowance will encourage manufacturers to develop and implement such features thus advancing overall power reductions in future products. Proposed language for the MOU on the weekend timer is contained in an appendix to this letter.

Again, Xerox Corporation is pleased for the opportunity to provide these comments in the hope that they will assist in making the Energy Star label a useful guide to consumers when deciding which imaging equipment to choose. If there are any questions regarding these comments, please feel free to contact me.

Sincerely,



Patricia Calkins
Vice President
Environment, Health & Safety

C: Michele Cahn
Victoria DeYoung

Appendix: Proposed Language for MOU

For imaging equipment with a “weekend timer” feature, the manufacturer can subtract the difference between the “sleep” power and the “weekend sleep” power for the specified time (48 hours) from the product’s total TEC result before comparing the product’s TEC to the criteria limits. In order to take advantage of this allowance, the “weekly timer” must meet the definition in Section XX and be a default setting prior to shipping.

“Weekend Timer”: Time set by the manufacture prior to shipping that determines when the product will enter and exit the “weekend sleep”. The weekend timer starts at 12:00am Saturday and ends 12:00am Monday for a cumulative 48 hours.

“Weekend Sleep”: The reduced power state that the product automatically enters into during the weekend hours. The product can still maintain network connectivity in this mode.

Example: A printer’s total TEC result is 10 kwh/wk and the product has a weekend timer feature. The sleep mode power is 20W and the weekend sleep power is 10W. $(20W - 10W) \times 48 \text{ hours} = 480 \text{ wh/wk}$, which is then subtracted from the tested TEC value: $10 \text{ kwh/wk} - 0.480 \text{ kwh/wk} = 9.52 \text{ kwh/wk}$. 9.52 kwh/wk is then compared to the TEC limit.