

US EPA

Dear Kathleen Vokes,

Apr 15, 2010

We would like to make some comments on the presentation material 'Enhanced Testing and Verification' dated March 31.

JB Mia is a Japanese industry organization of imaging equipments such as copiers, MFD, and printers. Since the start of Energy Star program in 1995, we have engaged in various activities (e.g., revision of the criteria, designing and introducing the 2005 TEC measurement method) for the past 15 years under US-Japan mutual authentication system ~~、また~~ to support Energy Star program continuously and make as much commitment and cooperation as we can. ~~色々ありましたが、絶えず~~

We were informed that a case of abuse of Energy Star had occurred, which might have been partly due to radically broadened coverage of products in this program in your country.

There might be cases of trivial mistake such as erroneous description. However, a stringent measure or penalty should be imposed to such cases as ~~詳細は分かりませんが、~~ repeated offence or admittedly intentional fraud in a self-certifying process, though being a voluntary standard. ~~明確な場合~~

Each company of our imaging equipment industry, however, ~~ただ~~ has long had a high regard to this self-determined process and had no problem in coping with this process so far, as described above. The current TEC measurement method for imaging equipments started on April 2007. It is highly complicated compared to the OM method, however each company of our industry has had experiences in your country of conducting measurements according to the measurement standard ASTM F757 of your country, which is similar to the TEC method but more complicated, and providing necessary data since before the launch of Energy Star program.

In addition, we consider that excellent results could result from the fact that the measurement facility of each company in our industry obtained ISO 9001 certification as an international quality standard etc., and has renewed them for a long period.

It is therefore desirable that measures will be created considering the previous performance or status, not that the issue of labeling to nonconforming products will trigger a uniformly stringent measure taken for all products covered.

Each company of our industry strongly desires that the self-certifying process will continue to exist in the future as before.

Each company of the industry has renewed the above quality standard at substantial cost to continue to maintain or improve the quality level of measurement personnel and equipments, etc., and earnestly desires that further increase in burden of expense due to usage of an external measurement facility or certification by an external agency would be avoided as much as possible. We sincerely appreciate it if you take into account

possible extraordinary loss in the new products to be launched for which data has not been submitted, and judge the possibility of taking the measure after deliberate investigation of the status.

Copier/MFD Technical Sub-Group of JBMIA