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**From:** Brett Serene [Brett.Serene@efi.com]  
**Sent:** Friday, April 30, 2010 4:38 PM  
**To:** ENERGYSTARVerificationProgram@energystar.gov  
**Cc:** vokes.kathleen@epa.gov; kaplan.katharine@epa.gov  
**Subject:** Comments on ENERGY STAR(r) Products Enhanced Testing and Verification  
**Attachments:** SPI\_SPI5002UC\_ECOS 1295\_500W\_Report.pdf; SPI220LE\_250W\_80PLUS\_Report.pdf

To whom it may concern:

We appreciate the effort of EPA and DOE to strengthen and enhance the ENERGY STAR brand through its proposed product testing and verification program. As a company committed to creating energy efficient products for the Imaging Equipment industry, we want to ensure our products will always pass any random sample testing. After reviewing the enhanced testing and verification proposal, especially the "Government Testing Program" and "Market-Based Testing Program" flowcharts on pages 7 and 8 respectively of the "ENERGY STAR® Products Enhanced Testing and Verification" presentation slides dated March 26,2010; we would like to offer the following suggestion in the area of failure root cause analysis and sanctions for products that fail random testing.

One of the major testing points in the proposed ENERGY STAR verification program is to use random sample testing to ensure that the equipment manufacturer did not initially submit a "hand selected/perfect" system for ENERGY STAR certification, while actual production units may or may not meet ENERGY STAR requirements. In essence, the equipment manufacturer is responsible for ensuring all components used to construct the device regardless of any process variation will continue to meet ENERGY STAR requirements. This guarantee of ENERGY STAR compliance also applies to any modifications or cost reduction measures that may be applied to the product over its "availability for sale" life. In our ENERGY STAR product category (i.e., Imaging Equipment Digital Front End), the primary factor that determines whether we meet ENERGY STAR criteria is the efficiency of the external/internal power supply. As a low to mid volume system manufacturer we cannot afford the cost of specifying a custom power supply nor are we able to impose quality terms on any of the major power supply manufactures. In other words we purchase standard catalog power supplies. As part of our power supply procurement process we request and receive efficiency compliance reports (please see attached enclosures for examples of two 80Plus qualified power supplies). Because we purchase standard catalog power supplies, we have no control over whether the power supply manufacturer initially submitted "hand selected/perfect" samples for certification or that any process modifications made by the power supply manufacturer, which do not invalidate its safety certificate, enable the unit to continue meeting energy efficiency requirements.

Given our reliance on the power supply's efficiency for meeting ENERGY STAR criteria and the high costs associated with selecting a new power supply should our product ever fail random verification testing (e.g., approximately \$20,000 for FCC, UL, TUV and other certifications plus between four and six months to select a new vendor and refill the supply pipeline), we would like to see some form of sanction applied to the power supply or other energy efficiency certified component manufacturer and not just the end-equipment that used the failing part. Specifically we believe that whenever the root cause of a random verification test is traced to a certified energy efficient component (e.g., power supply), that not only should the end product be delisted by ENERGY STAR; but the failing component should also be listed. And that ENERGY STAR should work with the component's certifying group (e.g., 80Plus) to rescind the component's certification. By publically identifying the manufacturers' of certified energy efficient components that fail to meet efficiency requirements for their production units, it provides incentive for these manufacturers to ensure their components continue to meet energy efficiency requirements. For example, if EPA were to adopt this suggestion and expand it so that an email is automatically sent to all ENERGY STAR partners whenever a certified energy efficient component was identified as the root cause for a product being delisted, then as a group (i.e., all ENERGY STAR partners that use that same manufacturer or component) we could pressure that company to correct the problem or we could move to an alternate supplier.

While the above focused on power supplies, since this is our primary concern, we believe that any ENERGY STAR product category manufacturer that uses certified energy efficient components in the construction of the final ENERGY STAR certified product could benefit from this proposal. This proposal forces the accountability for creating energy efficient products throughout the entire supply chain and not just on the final product manufacturer. Additionally, this proposal helps small to mid size manufacturers that do not have the clout, resources, or capital to guarantee their energy efficient component suppliers continue to meet energy requirements after initial certification.

We hope that you will consider the above proposed sanctions and reporting of failing certified energy efficient components into the final testing and verification specification. Should you have any questions concerning the above, please feel free to contact me directly either by email or telephone.

Regards,

Brett A. Serene

Senior Principal Engineer and System Architect

P.S. - Please note that while we have enclosed power supply test reports from our current supplier, Sparkle Power Incorporated, and the above discusses possible sanctions for power supply manufacturers that ship components that do not meet the efficiency levels of the unit's label, we do not mean this to imply that Sparkle Power Incorporated has delivered, to our knowledge, any power supply that is inconsistent with its labeling (i.e., the enclosures are for illustration purposes only).

Electronics For Imaging, Inc. (EFI)

Voice: (650) 357-3474

Fax: (650) 357-3766

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