

Email received on January 4, 2010 from Daniel Bateman

To Whom It May Concern:

I am writing on behalf of Printronix, Inc. a small business that manufactures industrial printers (such as thermal barcode label printers) that participates in the ENERGY STAR program for Imaging Equipment. This is written to voice concern for the stated goals of the latest MOU to frequently update ENERGY STAR criteria and to award the ENERGY STAR to only the top 25% of participants. While I understand the rationale for this approach, the constant changing of requirements and the limiting of the award has negative effects on industry.

More and more, ENERGY STAR is not viewed by industry as an award per se, but rather, as a specification that must be met in order to do business with more energy savvy customers (including the US Government). Recently, other countries are adopting the ENERGY STAR criteria as specifications that must be met, rather than voluntary compliance. As such, the ENERGY STAR criteria must become part of a product specification, and the award a necessity, not a voluntary program. To assume that only 25% of manufacturers will be able to meet the specification assumes that the other 75% are willing to forego the business.

As I said, I understand the rationale to continually ratchet the bar upwards. However, product development cycles and the cost to continually upgrade equipment forces industry to take a hard look at the return on investment. Ultimately, given the rationale for continuous improvement, the ENERGY STAR requirement for our class of product may reach "zero energy consumption". While an admirable goal, this is not a reasonable expectation.

Instead of limiting the ENERGY STAR award to only the "top 25%", the criteria should be made mandatory for any company that wants to participate, with no artificial exclusions. The practice of ratcheting the bar upwards should be done more methodically, and based on the reasonableness and necessity for change with an eye to what other countries are doing as well. The criteria should only be changed after deliberation with industry and all other relevant stake-holders.

There are other environmental projects underway, such as EPEAT that can conflict with ENERGY STAR both domestically and internationally. Every effort must be made to harmonize requirements to make the goals achievable for industry. That will be the only way to broaden participation and ultimately benefit the planet. Thank you for your consideration.

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