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Maria Vargas
Energy Star Program
United States Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Sent via E-mail: vargas.maria@epa.gov

Dear Ms. Vargas:

Xerox is pleased to offer the following comments in response to EPA's request for feedback on "a proposed new program element to identify and advance highly efficient products in the marketplace." Xerox has several concerns about this approach, particularly if it were to be broadly applied across a full spectrum of products.

Exclusivity and Consumer Confusion

The ENERGY STAR program as currently structured is designed to be exclusive. Adding an additional segmentation that attempts to further differentiate leadership energy efficiency is confusing to the consumer. ENERGY STAR is a simple and effective means for consumers to identify the most energy efficient products on the market without getting bogged down in lots of detail.

Declining Returns for Many Products

In many product categories, there is little benefit to consumers in identifying a higher tier of energy efficiency. For example, imaging equipment energy efficiency has improved dramatically since the inception of the ENERGY STAR requirements in the mid 1990s. An additional tier does not make sense from a cost/benefit perspective. In comparison the larger opportunity is to emphasize the benefits associated with optimizing one's print infrastructure. By reducing the number of single-purpose, desktop devices and optimizing around a smaller number of ENERGY STAR qualified multifunction products, significant reductions in energy use can be demonstrated.

Picking Winners and Losers

The addition of a top tier will emphasize the attractiveness of specific technologies due to the potential for lower energy consumption. In effect, this program would equate to the EPA picking the technology winners and losers.

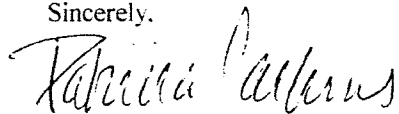
Discourages Remanufacturing

Since imaging equipment manufacturing cycles can be much longer than traditional consumer products, having to meet changing specifications discourages design for long life. Instead of encouraging remanufacturing and design for long life and upgradeability, this approach promotes design for disposability and can create a larger environmental impact.

Diversion from Other Innovations in the ENERGY STAR program

EPA needs to address other issues of greater import to stated purpose for Energy Star. For instance, EPA should be devoting increased resources to such projects as developing a life cycle perspective rather than over-emphasizing reductions in use-phase energy. ENERGY STAR'S resources may be better off on projects such as these absent strong market research indicators that consumers are looking for an even more exclusive energy efficiency product label.

Sincerely,

A handwritten signature in cursive script, appearing to read "Patricia Calkins".

Patricia Calkins, Vice President
Global Environment, Health, Safety & Sustainability