

Clarification Regarding Testing, Qualifying and Reporting, and Labeling Products Under the ENERGY STAR[®] Imaging Equipment Specification, Version 1.0

TESTING PRODUCTS

Partners have asked EPA for clarification regarding the following scenario:

- The ENERGY STAR Qualified Imaging Equipment Typical Electricity Consumption (TEC) Test Procedure states, “The type of network connection (or other data connection if not capable of being networked) is at the discretion of the manufacturer...” The selection of certain settings for devices connected to the network may impact power consumption levels. Since many configurations and settings are possible, please clarify how the representative test configuration should be chosen.

EPA’s response:

- As stated on page 1 of the TEC Test Procedure, “The product shall be configured as-shipped and recommended for use, particularly for key parameters such as power-management default-delay times...” EPA’s expectation is that ENERGY STAR qualified imaging equipment will save energy and use power management features "out of the box" without requiring special configuration of the imaging device or other devices (such as PCs) on the local network. If fully-networked machines are perturbed by ordinary network events while in sleep, these disturbances and energy consumption should be captured when testing for ENERGY STAR compliance.

QUALIFYING AND REPORTING PRODUCTS

Maximum Machine Delay Time

Partners have asked EPA for clarification regarding the following scenario:

- Page 12 of the Version 1.0 specification explains, “a maximum machine delay time ..., which is only adjustable by the manufacturer.” Are service staff dispatched from a maintenance company included in ENERGY STAR’s definition of a manufacturer?

EPA’s response:

- The maximum machine delay time is the maximum delay time of which the product is physically capable. This delay time is only adjustable by the manufacturer, typically through internal, invasive product manipulation (e.g., removing the product casing). Maintenance staff that operate independently from the manufacturer are not considered to meet this definition.

Submitting Product Data to ENERGY STAR

Partners have asked EPA for clarification regarding the following scenario:

How does one submit product data for qualification to ENERGY STAR?

EPA’s response:

The Welcome Aboard Package that partners receive when they commit to the Version 1.0 Imaging Equipment Specification contains an Excel-based Qualified Product Information (QPI) form for

submitting product data to ENERGY STAR. This form was developed as an interim tool to allow partners to report qualified products while the Online Product Submittal Tool (OPS) was modified to accommodate the new specification. EPA anticipates OPS will be ready for use in late-March, which is a slight delay from the original planned release of mid-March. Partners should continue to use the Excel-based QPI form to submit data until EPA announces that OPS is live. EPA will upload any products submitted via the Excel form into OPS.

LABELING PRODUCTS

Labeling Requirements with Regard to Duplexing Capability

EPA has received multiple questions regarding the labeling requirements as they relate to the duplex requirements of Version 1.0. The specification requires that Color Copiers, MFDs, and Printers with a speed between 20 and 39 ipm offer automatic duplexing as a standard feature or optional accessory at a time of purchase and that this feature be standard for products with a speed of 40 or more ipm. Monochrome Copiers, MFDs, and Printers with a speed of 25-44 ipm must offer automatic duplexing as a standard feature or optional accessory at the time of purchase. Products with a speed of 45 or more ipm must offer automatic duplexing as a standard feature at the time of purchase.

Partners have asked EPA for clarification regarding the following scenarios:

- A manufacturer builds a base unit that meets the energy requirements of Version 1.0 in one location. The manufacturer does not know at the time of manufacture if the product will be sold with a duplex unit.
- A manufacturer builds modular products which allow the end user to order a wide range of options at time of purchase. A customer may make use of accessories purchased with a previous iteration of a product with a newer iteration. As such, a customer may not wish to purchase a second duplexer when buying the newer version of this new high speed imaging product. Again, the manufacturer applies the ENERGY STAR label to the basic engine that qualifies for ENERGY STAR at the time of production and will not know at this time if the duplexer will be ordered.
- The high speed imaging product may be sold with a duplex tray, but this tray and the capability may not be exploited once received by the dealer.

EPA's response:

- EPA recognizes that an array of manufacture and distribution scenarios for base products and duplex accessories may make meeting the labeling requirements noted in Version 1.0 complicated. EPA's labeling requirements are intended to highlight leadership products when it comes to energy efficiency, making identification and purchase of such products easy for the consumer. Both EPA and the Agency's partners are committed to the integrity of the ENERGY STAR mark and clear and defensible messaging around it. Balancing both real manufacturing challenges and the desire to be clear with consumer, EPA is offering the following flexibility.

- A partner may label their base product (that meets the energy efficiency requirements associated with the ENERGY STAR Version 1.0 Imaging Specification - and may or may not be bundled with a duplex tray). The partner must, in this case, make clear in their product literature, on their Web site, and in institutional sales literature that although the product meets the ENERGY STAR energy efficiency requirements, the product only fully qualifies for ENERGY STAR when bundled with or used with a duplex tray. EPA asks that partners use the following language to convey this message to customers:

"Achieves ENERGY STAR energy savings; product fully qualifies when packaged with (or used with) a duplex tray."

Labeling of Packaging and Collateral Materials Shared by ENERGY STAR Qualified and Non-Qualified Products

Partners have asked EPA for clarification regarding the following scenarios:

- A manufacturer may develop common packaging and user guides, etc. for both ENERGY STAR qualified and non-qualified products.
- A manufacturer may develop and then adapt on a regional basis data sheets for all models. The revision of these collateral materials globally represents a significant level of effort. This effort may be need to be duplicated when Tier 2 of the Imaging Requirements go into effect, possibly burdening partners.

EPA's response:

- Partners may prepare one version of product manuals, packaging, or specification sheets and indicate in those materials which models qualify for ENERGY STAR. EPA requires only that the ENERGY STAR mark is used in a manner that is clear to the consumer. Partners have suggested doing so by noting qualified products on the printed material, on packaging, or on a Web site. If partners require additional clarification, EPA is happy to review specific examples of draft language or material designs to convey this to consumers.
- For detailed information concerning use of the ENERGY STAR mark, please consult the ENERGY STAR Identity Guidelines available at:
https://www.energystar.gov/index.cfm?c=logos.pt_guidelines
- ENERGY STAR has developed several Web-based tools to help partners promote ENERGY STAR. Guidance is available at:
http://www.energystar.gov/index.cfm?c=manuf_res.web_based_tools