

November 9, 2007

**Comments from the JEITA Printer Energy Savings WG on Draft 1 Version 2.0 ENERGY STAR EPS specification**

Comment 1

We ask that you add the following statement to the EPS Tier 2 requirements given in Draft 1.

- Additional statement

For product models where an external power supply is sold (packaged) together with a computer or imaging equipment, EPS Tier 2 requirements will come into effect at the same time the Tier 2 specifications for the computer or imaging equipment apply.

(For imaging equipment: prior to the Tier 2 effective date (scheduled for April 1, 2009), a product model would qualify as Energy Star if both the external power supply and the IT device satisfy Tier 1 specifications.)

- Reasons for the addition

(1) The current wording may lead to confusion among partners. The statement above was given in the October 11, 2007 letter from the U.S. Environmental Protection Agency. However, the statement was not reflected in the description of EPS Tier 2 given in Draft 1.

Quote from the U.S. Environmental Protection Agency letter:

*Computers and Imaging:* Current specifications for these product categories require partners to meet the EPS Version 1.1 requirements, where applicable. EPS Version 2.0 requirements will be effective for computers and imaging equipment at the same time the Tier 2 specifications for those products apply.

(2) Designs for high efficiency (energy-conserving designs) require significant lead time. Given that the April 2009 effective date for imaging equipment Tier 2 will be very difficult to meet as it stands, corresponding to the basic effective date of June 2008 will be next to impossible.

## Comment 2

Request 1: We would like the requirements to be the same as California's EPS requirements given in Table U-2.

Request 2: If it is not possible to use the same requirements as California's EPS requirements in Table U-2, we would like the average efficiency set to values about 2% less than the values in Table U-2.

Request 3: If it is not possible to change the Draft 1 requirements, we would like the effective date to be extended from July 1, 2008, by a minimum of one year.

The reasons for this request are that in attempting to satisfy the EPS Version 2.0 requirements as given in Draft 1:

1. Partners would have to start again to meet the new Version 2 requirements after now having met California's EPS requirements. We would like to see consistency between the standards.
2. The process of qualifying for Energy Star would place additional administration costs on partners: partners would be forced to reassess and acquire anew safety standards (UL, TUV, and other national standards) for their product models using the adaptors and would have to re-measure and re-qualify their product models under national interference and noise standards.
3. The procedures in 2 above would incur not only significant expense but also time. A minimum of one year is required to ready a new adaptor and to have it satisfy the requirements for each product model.