

Epson America comments on:

ENERGY STAR Program Requirements for Imaging Partners version 1.2

1). In ENERGY STAR® Program Requirements for Imaging Equipment Partner Commitments on page 5 under Definitions; E) Additional Terms; 14) Product Family please consider the following changes.

Product Family: A group of product models that are (1) made by the same manufacturer, (2) subject to the same ENERGY STAR qualification criteria, and (3) of a common basic design. Product models within a family differ from each other according to one or more characteristics or features that either (1) have no impact on product performance with regard to ENERGY STAR qualification criteria, or (2) are specified herein as acceptable variations within a product family. For Imaging Equipment, acceptable variations within a product family include:

- 176 a) Color,
- 177 b) Housing, or
- 178 c) Any of the functional adders specified in Table 9.
 - d) Power Voltage, Frequency
 - e) Duplexer, Paper feeder/output unit, etc,(Excepting the print unit)

2) In ENERGY STAR® Program Requirements for Imaging Equipment Partner Commitments on page 15 under 4 Testing please consider the following changes

4.2.1 Representative Models shall be selected by CB or who is responsible for testing per the following requirements:

- i. For qualification of an individual product model, a product configuration equivalent to that which is intended to be marketed and labeled as ENERGY STAR is considered the Representative Model;
- ii. For qualification of a product family,

Families of imaging equipment models may be qualified through submission of test data for a single, representative model.

CB or testing laboratory may test and report the highest configuration available in the family, rather than each and every individual model. When submitting model families, manufacturers continue to be held accountable to the CB for any efficiency claims i.e. the highest configuration available in the family shall meet the Energy Star qualification criteria made about their imaging products, including those not tested or for which data was not reported.

3) In Test Method; page 3 please consider the following change:

Table 3: Paper Size and Weight Requirements

Market	Paper Size	Basis Weight (g/m2)
North America / Taiwan	8.5"x 11" / A4	75
Europe / Australia / New Zealand	A4	80
Japan	A4	64

4) In Test Method; page 3 under G) Measurement Accuracy: please consider making the following changes

1) Power measurements with a value of 0.5 W or greater shall be made with an uncertainty of less than or equal to 5% at the 95% confidence level.

5) In ENERGY STAR® Program Requirements for Imaging Equipment Partner Commitments page 16; under 6 Effective Date

Please consider changing the effective date to January 1, 2011 or later. Making the requirements retroactive for over a year will result in an added cost burden for partners and Energy Star.

6) In ENERGY STAR® Program Requirements for Imaging Equipment Partner Commitments page 1; under Qualifying Products please consider making the following changes because current products schedules require printer materials to be developed and produced simultaneously with products. It would be difficult or impossible to build products for Energy Star testing before boxes and printed material is produced:

1 Obtain certification of ENERGY STAR qualification from a Certification Body recognized by EPA for imaging equipment prior to ~~associating shipping the product to any retail outlet or customer the ENERGY STAR name or mark with any product~~. As part of this certification process, products must be tested in a laboratory recognized by EPA to perform imaging equipment product testing.