

Canon Comments on Energy Star Imaging Equipment Draft 2

(1) About OM marking engine value (Page 17)

We consider that the marking engine value setting of OM3 should be decided based on an appropriate modification.

In this Draft 2, "Qualifying Products" are defined as "not industrial products or products directly connected to three phase power", but such industrial products seem to be included. For example, these products we choose as examples in attached document are usually industrial products, which put in the factories. We suppose that there is influence of industrial products included in a calculation by these data, because the value seems remarkably risen in the Draft 2.

We would appreciate it if you confirm the products data for marking engine value setting of OM3.

(2) Effective date in "products sold with an external power adapter" (Page 10)

The effective date of Energy Star requirements ver 2.0 for External Power Adapter sold with Imaging Equipments is the same as that of requirements ver 1.1 for Imaging Equipments, that is, after July 1, 2009, as amended. But this Draft 2 says in page 10, "To qualify as ENERGY STAR under the Imaging Equipment Version 1.1 Tier 2 requirements, imaging equipment products manufactured on or after April 1, 2009 using a single-voltage external ac-dc or ac-ac power adapter must use an ENERGY STAR qualified adapter, or one that meets the ENERGY STAR External Power Supply (EPS) Version 2.0 requirements when tested to the ENERGY STAR test method". We consider that the postponement of the effective date should be reflected appropriately and that the date should be "July 1, 2009".

(3) About Maximum Standby Power Levels for All Small Format and Standard-size OM Products with Fax Capability (Page 14)

This comment relates to Table D in p.14. 2W of maximum standby power level for all small format and standard-size OM products with FAX capability is changed into 1W in the draft 2.

In the draft of ENERGY STAR Program Requirements for Imaging Equipment, "Standby" is defined as "The lowest power consumption mode which cannot be switched off (influenced) by the user and that may persist for an indefinite time when the product is connected to the main electricity supply and used in accordance with the manufacturer's instructions". In

addition, it is explained as “For Imaging Equipment products addressed by this specification, the Standby power level usually occurs in Off mode, but can occur in Ready or Sleep. A product cannot exit Standby and reach a lower power state unless it is physically disconnected from the main electricity supply as a result of manual manipulation.”. This definition comes from IEC 62301 – Household electrical appliances – Measurement of standby power (2005), and it is usually understood as the lowest power mode when a product is plugged in to a power supply.

Some products with FAX capability in the current market always make the network function on and are able to receive FAX messages in order to match the products’ main purpose/usage or to improve their usability. For such products, “Standby” occurs in “Sleep” or “Ready”, and energy consumption in their “Standby” may become higher than others.

It is our understanding that FEMP has recommended 2W as standby power for products with FAX capability in spite of higher than other products, in considering power for receiving FAX messages as described above. FEMP recommended level of Standby for FAX is still 2W. According to this FEMP recommendation, some OM products with FAX capability don’t have power switch with a view to having the ability to receive messages even in “Standby”.

On the other hand, “Standby” power is proposed as 1W whether the products have FAX capability or not, in the Table D in p.14 of Draft 2 of the Program Requirements for Imaging Equipment ver 1.1. The note for that says "This 1.0 W Standby requirements is consistent with international criteria". The referenced “international criteria” are exactly unclear, but there are some movement for legislation of “Standby 1W”, for example, in the EU. However, the definition of “Standby” in the International Standards IEC 62301 is now under consideration, and the CD which was proposed in last November defines "Standby mode" in distinguishing from "Network connected standby mode(s) ". For example, the EU legislative proposal reflects this draft proposal for IEC standards, and its application of criteria of “Standby 1W” is limited only to “Standby” which is not “Network connected standby”. In contrast, the introduction into the Energy Star of such criteria reflecting draft IEC revision (distinguishing between “Standby” and “Networked standby”) might cause confusion for Industry in choosing design options, though the definition of “Standby” in Energy Star is the same as current IEC Standards (not distinguishing “Standby” from “Networked standby”).

Of course, “Standby 1W” can be attained in products with FAX capability by adding power switch to them with a view to making unable to receive messages in “Standby”. However, as discussed above, manufacturers who design their products with a view to having ability to receive FAX also in the lowest power mode when they are plugged in to a power supply

would need longer period for design change with the change of the concept of "Standby".

Therefore, in order to give enough period to change the design concept, we would like to propose that "Standby" criteria be changed at next revision of requirements for Imaging Equipments. That is, maximum standby power level for all small format and standard-size OM products with FAX capability remains as 2 W. The future revision of "Standby" according to the change of international standards such as revision of IEC 62301 be only announced at this time.