

**Subject:** Epson's comments on ENERGY STAR First Draft Operational Mode Test Procedure for Imaging Equipment

After reviewing the First Draft Imaging Equipment Operational Mode (OM) Test Procedure and accompanying rationale from Ms. Trager's e-mail, we listed the below comments and suggested EPA adding mini printers into the scope of Smaller -size products of Energy Star specifications for Imaging Equipment:

### **1. Test Pattern for measuring the Speed of Standard- and Smaller-size Ink Jet Printers**

We would like to propose that the test pattern is comprised of Annex B, "Letter test patterns" of the ISO 10561 instead of your proposal, ISO/IEC 24712. The reasons are as follows:

- 1) ISO/IEC 10561 (Information technology - printing devices - Method for measuring printer throughput) already specified clearly a standard for measuring printer throughput and has been popular worldwide as an international standard. If we have to use standard(s) other than ISO/IEC 10561 for the Energy Star, our workload would increase and we would like to avoid that.
- 2) In order to maintain consistency and harmonization in the Energy Star specification, we prefer to use the same test pattern for both OM (Operational Mode) and TEC (Typical Electricity Consumption) equipment.
- 3) Although ISO/IEC 10561 does not specify a color printing pattern, we believe that we will be able to follow the same ideas; that there are no significant differences between monochrome and color imaging equipment.

### **2. Epson's mini-printers**

2-1. Are Seiko Epson's mini-printers expected to be within the scope of the revisions of the Energy Star Specifications for Imaging Equipment?

We, Seiko Epson, would like to ask you to make the revisions of the Energy Star Specifications for Imaging Equipment cover our mini printers clearly. We are manufacturing mini printers used for registers at fast food chains, grocery stores and banks in the POS market and if we could make our mini printers Energy Star qualified, the Energy Star logo would be expected to boost our sales. The mini printers are always connected with a host system and print out receipts. For more information on our mini printers, please access the web site, <http://pos.epson.com/posindex.htm>. Could you please confirm whether our mini-printers will be within the scope of the revisions of the Energy Star Specifications for Imaging Equipment?

2-2. Test Pattern for measuring the Speed and calculation of the Energy Star speed of mini-printers

Referring to the sentence below shown in the "Energy Star Speed" of section 1. Test Parameters in the First Draft Test Procedure Operational Mode Approach, I believe that we, manufacturers, are allowed to claim the "Energy Star Speed" and to decide the test pattern of our mini-printers by ourselves. Could you please let us know whether the understanding is correct or not? If not correct, please let us know.

For all other product categories, the "ENERGY STAR speed" is derived from manufacturer claims. If the maximum claimed speeds differ when producing images on 8.5" X 11" or A4 paper, the higher of the two shall be used.

If you have any questions about our comments, please let me know. I would like to thank you for your efforts to give us the opportunity to feedback manufacturer's concern about the Imaging Equipment Operational Mode Test procedure. I appreciate your reply at your early convenience

time as soon as possible.

Thank you very much.

Best regards,

Peter Yang  
Asst. Manager, MSE/QA Dept.  
Epson America, Inc.