

## **JBMIA Copier/MFD Technical Sub-group**

Subject: JBMIA's Comments on OM Approach First Draft

### 1. Electro-photographic large format MFDs

The test procedure for large format MFDs should have requirements for measurements of Low Power mode and Sleep mode, respectively, in the draft, as in the current MOU. The current MOU for large format MFDs includes requirements for Low Power mode and Sleep mode, respectively. These two modes are handled obviously as different modes in the MOU. However, in the OM draft, large format MFDs should be subjected to measurement in one mode only, Sleep mode, in Step 5 in Table 1 on page 3, because they do not have Auto-off mode. This does not conform to the current MOU.

### 2. Electro-photographic large format copiers

To avoid confusion, the draft should clearly describe that Sleep mode in Step 5 in Table 2 on page 4 in the draft is equivalent to Low Power mode in the current MOU for large format copiers.

The current MOU has requirements for Off mode as well as Low Power mode. Like large format MFDs mentioned above, it has requirements for two modes. For large format copiers having Auto-off mode, the draft provides that measurement should be made in Sleep mode in Step 5 and Auto-off mode in Step 7. We believe that the requirements for the two modes correspond to the requirements in the current MOU.

If Off mode in the current MOU is referred to as Auto-off mode in the draft, we do not think this will have trouble, because FEMP-compliant mode is referred to as Off mode in the draft.

However, as for Sleep mode in Step 5 in Table 2 on page 4 in the draft, it should be clearly specified as equivalent to Low Power mode.

### 3. Ready mode

To avoid complicated measurements, we request for elimination of measurement in Ready mode from the draft. Generally, short-time measurement is not appropriate to the Ready mode like Low Power mode, because measurement results in both two modes are influenced by fusing heater control. We do not think requirements for Ready mode should be particularly provided in addition to the mode requirements provided in the current MOU.

### 4. Standby power measurement

Unless you are planning on incorporation of requirements for standby power provided in FEMP into the International Energy Star Program, the Energy Star OM test procedure should not include measurement of the standby power.