

Kodak Stakeholder comments on Directional Draft Scanner MOU

In essence, DI does not agree with the Directional Draft as it applies to scanners, and wishes to assert the comments that follow.

Re: Grandfathering

The consensus is that grandfathering should be retained since the payback time on a design for a commercial capacity, high-speed (production) scanner is very long.

- Carl Tesavis (program manager) said "In order to change the design to meet these new requirements (6 watt power consumption when in sleep mode) there would be a increase in the electrical BMC (Base Material Cost) for (program name), a XXX month schedule delay and potential 2 million dollar loss in revenues. This represents a significant negative impact for the ... business case.

..... It is not logical to ignore this fact and not provide the ability to grandfather products and designs which cost hundreds of thousands of dollars to produce and modify, not to mention the time to market implications of delaying the release of a product while attempting to hit a moving target."

Re: 6-Watt Power Level

It is felt that the 6-watt power level proposed is too aggressive. Programs now in design need considerably more time to have their power management systems restructured. Given the complexity of production scanners, this is a significant task. As the timeline is now proposed, products presently being finalized would be obsolete within a year of introduction.

- Dan Phinney (electrical development) makes the point that the magnitude of the change represented by the halving of power level is inconsistent with the release date of a program close to release, the life of which extends well past the proposed effectivity date of the Directional Draft.
 - Dave Pultorak (development director) suggests that the new Energy Star power level, if changed, should be reduced from the current 12 watts only by about a third, to 7 or 8 watts . This would advance the standard, while utilizing the margin of the existing design.

Other points - -

- **Scanner product performance distinctions** - The Directional Draft draws no distinction between simple desktop scanners and high-end production scanners. Production scanners are vastly different, and warrant graduated performance level distinctions with commensurate increases in stand-by power level. Compared to inexpensive desktop scanners, true "Production" scanners feature -
 - More extensive and power-consuming electronics for embedded image processing
 - More intense light sources that require more time to stabilize after being re-energized.
 - More powerful document transport mechanisms.
 - Document feeder drive mechanisms
- **Consequential costs** - Re-engineering for power reduction forces recertification activities in safety and EMC, with associated tooling, inventory, and personnel costs. This activity is not limited to just the USA, but extends to all other markets as well.

- **Staged Introduction** - Production scanner manufacturers need ample lead-time to incorporate power reductions on the order of 50% . To allow for the orderly design of power savings features, it is proposed that any reduction of power consumption below the present 12 watts occur on a published timetable, over a span of up to 5 years. It is important that industry be allowed to recoup the good-faith investments made in only the last year to achieve the existing 12 watt level. Reductions to levels below 12 watts should occur in stages, with perhaps an intermediate 9 watt level, allowing a few years between levels.

Note: DI is nearing introduction of a new production scanner platform. Energy Star testing was performed to certify the scanner to the present 12-watt standard. In the course of that testing, it was found that the product in fact complies with the new proposal. It should be noted that this performance level was the result of about 2 years of effort applied to the fundamental product architecture in both the scanner electronics as well as the power supply module. The fact that this performance is achievable should not be taken to imply that the approach is either simple or transferable to existing products without total redesign.

- **Identification** - It is possible for different levels of Energy Star performance to exist in the market concurrently, using distinctive Energy Star labeling to alert the purchaser to differences in energy savings potential. As specifications evolve to lower standby power levels, products could be identified with logos containing variables linked to effectivity, like "Energy Star 2004", "Energy Star 2006", and so on. Manufacturers can re-certify to more recent specifications as their designs allow and market forces demand, and update product marking accordingly. Compared to the cost of engineering the hardware changes, the cost of artwork changes is trivial.

Thank you for allowing us the opportunity to comment on this document.

Please forward these comments to the EPA for their consideration.

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