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USA

Mr. Chris Kent
ENERGY STAR Office Equipment Program Manager
Office of Air and Radiation
US Environmental Protection Agency

Subject: Comments on the ENERGY STAR Imaging Equipment Draft Test Method for determining Imaging Equipment Energy Use (Rev Jul 2011)

Dear Mr. Kent:

Lexmark offers the following comments on the Draft Test Method for determining Imaging Equipment Energy Use Rev. Jul 2011

1. Lexmark is concerned with any changes that call into question the ability to use the existing test data to set new limits. If the old test data is deemed inconsistent with the new test process, then it cannot be used to set new limits. The changes proposed will cause a majority of the existing test data to be non-compliant with the new process.
2. 3.A – Lexmark supports the use of IEC 62301 Ed 2 for the test and instrumentation setup only. IEC 62301 is inappropriate for measurement process for modes other than standby and off modes. We have seen test labs make this incorrect assumption and desire that the EPA clarifies this distinction.
3. 3.G – Lexmark welcomes the inclusion of measurement uncertainty. However, the IEC 62301 is inappropriate for uncertainty of non-standby or off modes
4. 4.1.A – This section appears to indicate that simplex printing speed would be used for determining speed, but later sections would require the duplex speed used in testing if the duplex printing speed in sides/minute is higher. This is inconsistent.
5. 4.1.C – Use of Single Network Connection. Lexmark is fine with the use of a single network connection, but we are concerned about the mandate proposed.
 - a. The network specification now has to be verified by the test house and potentially the CB.
 - b. Most Test labs do not have 1GB Ethernet. Specifically, this 1GB Ethernet must also support EEE. This is an extra burden for testing houses.
Recommend not required GB vs. 100B to reduce the testing burden to external testing houses
6. 4.2.A – Appears to add a 2nd network connect for fax enabled devices.
7. 5.a.ii – While Lexmark supports testing products in their default configuration, we recommend removing the printer driver requirement. This is a quagmire as there are multiple default printer drivers. This would also add printer drivers to the critical component list in ISO Guide 65. With the rapid changes in printer drivers from initial testing to general availability, this will create an increase in testing to support the lack of change with driver changes.
8. 5.A.6 – Lexmark does not support the 2 hour waiting time in Ready Mode.
 - a. Most products do not stay in ready mode for more than 15-30 minutes. This means that the product will spend most of the 2 hours in sleep mode, which is not a thermal equilibrium
 - b. This will increase testing time, which increase costs to manufacturers.
 - c. No increase in repeatability will be gained

Regards,

A handwritten signature in black ink that reads "Christopher A. Saunders".

Chris Saunders
Lexmark ENERGY STAR Program Coordinator

