

**Comments on Draft Final
PFU limited
09/16/2008**

Thank you for giving us the opportunity to comment on the updated proposal for the ENERGY STAR program requirements for Imaging equipment final draft Version 1.1 specification.

On behalf of PFU, I would like to comment on the updated proposal with respect to the specifications of OM7 as follows:

(1) PFU agrees that the power consumption for scanning engines (OM7) in sleep mode is raised to 4.3 W.

(2) For the OM functional adders, however, we must ask you to make revisions to the final draft in part, according to our request (see below):

- 1.5 W for CCFL lamps
- 0.5 W for non-CCFL lamps (This figure is equivalent to that in the final draft.)

<The reason for our revision request>

The CCFL type is still a mainstream lamp currently used in document scanners.

According to Infotrend, the estimated global share of scanners by lamp type is:

70 to 80%: CCFL

20 to 30%: Non-CCFL (LED, etc.)

The CCFL lamp requires a certain time to produce a sufficient light amount after the scanner is turned ON from a complete power-off state.

To minimize this time and help users operate the scanner as quickly as possible, the CCFL must be kept preheated while the scanner is in sleep mode. And, therefore, this preheating power is necessary.

As a feature of quick starting from sleep mode is users' one strong demand, we do believe, from this point of view, that we must keep usability for our users.

In the meantime, we understand that it is also required to gradually reduce the amount of mercury used for CCFL to minimize environmental burdens.

We think that now is still a transition time to change towards this direction.

With the fact that there are still many scanners with many CCFL distributed in the market though the effective date of the Ver. 1.1 specification is nearing, we strongly request that the reference values of CCFL be eased.