



RISO KAGAKU CORPORATION

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August 6, 2008

Mr. Bijit Kundu
ICF International
1725 Eye St. NW
Washington. DC 20006

RE: Comment on the Draft2 Version1.1 Imaging Equipment
ENERGY STAR specification

Dear Mr. Kundu,

RISO Kagaku would like to submit our comments on Draft 2 Version 1.1 ENERGY STAR Imaging Equipment Specification as follows.

(1) The definition of High Performance Ink Jet (Line193-197)

We would like to ask you to reconsider the first sentence of the definition of High Performance Ink Jet so that the type of IJ is not limited. As described in the definition of Ink Jet(IJ) (Line203-206), typical types of IJ include Piezo-electric (PE) IJ, IJ Sublimation, and Thermal IJ, so we think the type of IJ should not be limited. We think the definition of High Performance Ink Jet is limited to products which use Thermal IJ by the first sentence, which includes the phrase "The use of thermal inkjet marking technology". Incidentally, our products use Piezo-electric (PE) IJ.

(2) DFE Efficiency Requirements (Line590-639)

Are we correct in understanding that "DFE Efficiency Requirements" is applied to only External DFE?

-If our understanding is correct, would you please put "External" before "Digital Front End" of the first sentence(Line590) to make clear the scope?

-If our understanding is not correct, that is to say, "DFE Efficiency Requirements" is also applied to Internal DFE, we think it is impossible to measure the efficiency of Internal DFE separately because many imaging equipment products operated by their Internal DFE share their power supply with their functions other than their Internal DFE, for example, their motors for their sheet feeder.

Sincerely,

A handwritten signature in cursive script that reads "Hirotooshi Yonekawa".

Hirotooshi Yonekawa
Environmental Protection Department