



**UK Market Transformation Programme (MTP)
Comments on ENERGY STAR Version 1.1 DRAFT 2 Imaging
Specification distributed on 16/07/08**

HIGH PERFORMANCE INK JET DEFINITION AND INCLUSION OF HIGH PERFORMANCE INK JET UNDER TEC (line 193 and 388):

MTP would suggest that this definition is included as a subset of the Ink Jet definition. The current positioning in the specification is confusing, as high definition ink jets are defined before a basic ink jet operation has been explained. However, MTP would support the definition in general as opposed to any definition based off printer speed for example. Consideration of high performance ink jets as TEC products seems appropriate as the impact will be predominantly in on-modes for this product.

POWER SUPPLY EFFICIENCY (line 399):

MTP supports proposed requirements for external power supply efficiency. MTP would also strongly support an internal power supply efficiency requirement.

REINFORCEMENT OF 25% MARKET THRESHOLD AIM FOR ENERGY STAR (line 468):

MTP strongly supports EPA's goals to only qualify the top performing 25% of the market as ENERGY STAR at the time of specification definition.

OM ELIGIBILITY CRITERIA (line 474):

"for products that meet the Standby-power requirements in Ready or Sleep mode, no further power reductions are required to earn the ENERGY STAR"

-- should read --

"for products that meet the Standby-power requirements in Ready or Sleep mode, no further **AUTOMATIC** power reductions are required to earn the ENERGY STAR" for clarity.

REMOVAL OF ADDITIONAL 1W ALLOWANCE FOR FAX MACHINES (and addition of lower functional adder) (line 508):

MTP would support the harmonisation on the 1W standby requirement and the more realistic lower allowance via a functional adder for fax functionality. For clarity, the table could be revised to simply state that all OM products have a 1W standby requirement

MTP would also suggest that a similar 1W standby requirement be introduced in Tier 3 for all TEC products for international harmonisation purposes (1W initiative).

DECLARATION OF ADDERS (line 530)

MTP would request that there be transparency on the EU database in terms of functional adders claimed per product and TEC job energy, preferably with power consumption values declared for each mode measured..

POWER SUPPLY ADDER (line 530)

MTP would favour removal of the power supply adder, but if it is to be retained, would support inclusion only for selected products as suggested, and with the lower adder allowance proposed in draft 2.

HARMONISATION OF FUNCTIONAL ADDERS FOR SCANNER LAMPS (resulting in lower requirement for scanners with CCFL lamps from 2W to 0.5W) (line 530):

MTP would support this in line with the EPA's aim of realising significant energy savings.

FUTURE SPECIFICATION REVISIONS (line 745 onward):

- **Future considerations of including OM products under TEC** – A consistent approach would be preferred to enable clear comparison between products and improved usability of the specification. However, MTP would not support inclusion of OM products under TEC unless the TEC approach could be made more transparent (see below).
- **Accounting for energy impacts of consumables in ENERGY STAR** – This is a complex and controversial area to address. Increased ink volumes in cartridges would result in reduced manufacturing energy requirements per ml ink. In addition, compatible non-OEM cartridges, either originals or remanufactured, are often available for printers and these different types of cartridge could all have different energy impacts.

- **Expanding duplexing requirements** – MTP would support re-assessment of duplexing requirements in a future tier, as driving toward increased duplexing could result in reduced paper usage and related energy impacts in paper manufacture.
- **Revising TEC test procedure** to make usage assumptions more transparent or measure distinct modes to allow for values relevant to actual usage patterns – MTP would strongly support further work on the TEC test procedure and the way in which TEC results are declared. The following is also suggested:
 - **Domestic scaling of TEC:** Development of a simple mechanism for scaling TEC values to enable provision of an alternative indicative TEC value for consumer use of the device (which could potentially be calculated automatically in the database and published). This will become increasingly important as domestic laser/LED printers become more common. It would be important to ensure that there was clear guidance on usage of the two TEC values where a product is marketed to both a non-domestic and consumer environment.
 - **DECLARATION OF RECOVERY TIME:** It is recommended that a means of declaring recovery time is developed by the EPA in order to address the issues raised by Ricoh concerning the “loophole” in the current specifications relating to recovery time, and the negative impact this could have on power management. If a mechanism is devised to make recovery time transparent, MTP does not believe that there would be a need to modify the TEC approach to skew TEC values in favour of quick recovery times in a subsequent Tier 3 (as proposed by Ricoh). It is however suggested that manufacturers are also asked to disclose the delay time to sleep configuration at time of testing. MTP would also request that EPA follow up with manufacturers to resolve the issue of apparently negative recovery times when calculated due to the difference between active jobs.
 - **PAGE VOLUME ASSUMPTIONS:** MTP would suggest that page volume assumptions be reassessed in a Tier 3 specification, as industry has confirmed that with the inflation in unit speeds over time, page volumes have not been scaled appropriately.

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