

Epson Comments on Product Specification for Imaging Equipment  
Draft 2 version 2.0

Epson would like to submit the following comments on the Product Specification for Imaging Equipment Draft 2 version 2.0. Thank you for your consideration.

**1. Recommendation:**

Input voltage and frequency should be an acceptable variation within device families.

**Reference:**

Section 4.3.1, Line 621: “Products shall be tested for qualification at the relevant input voltage/frequency combination for each market in which they will be sold and promoted as ENERGY STAR.”

**Our requested changes:**

“Products shall be *qualified* at the relevant input voltage/frequency combination for each market in which they will be sold and promoted as ENERGY STAR.”

**Reference:**

Section 1, Line 186: “Note: EPA has removed “input voltage and frequency” from the list of allowable variations to prevent conflict with international market qualification, as required in Section 4.3.”

**Our requested changes:**

Do not remove “input voltage and frequency” from the list of allowable variations in product families.

**Reasons:**

- a) Requiring testing at four worldwide power standards (100V/50Hz, 60Hz; 115V/60Hz; 230V/50Hz) would add to the cost and time necessary for testing and certification.
- b) The power output of imaging shows only very small differences across different voltage/frequencies. Far less than other allowable differences within a family.
- c) Current Certification Body agreements recognize that a product tested at 230V/50Hz will adequately represent family members with lower input voltages.

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**2. Recommendation:**

Data for long-life products, such as impact printers, should be collected over a longer period of time. Otherwise Energy Star qualification will be biased against this technology and many of these products will not be qualifiable.

**Reference:**

Section 3.4.4, Table 6, lines 557-559: Standard size printer base wattage – 0.6.

**Reference:**

Section 3.4.4, Table 6, lines 566-568: Large Non-inkjet printer base wattage - 2.5.

**Our requested changes:**

According to our analysis, the base value (Sleep Power) of impact printers should be 1.6W (0.6+1) for standard printer, and 8~9W (2.5+3.5~2.5+6.5) for Large Non-Inkjet printers.

**Reasons:**

See Attachment A:

**3. Recommendation:**

PSOR Adder:  $(P_{out}-10) \times 0.02$  should be expanded to include power supplies under 10 Watts.

**Reference:**

Sleep Mode Power Consumption, Section 3.4.4, Table 7: Sleep Mode Power Allowances for Functional Adders: “ $0.02 \times (P_{out}-10.0)$ ”

**Reasons:**

Power supply designers are discouraged from designing more efficient power supplies because higher-wattage power supplies are given an advantage via the functional adder.

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**4. Recommendation:**

Clarify the use of Energy Star labeling on products sold in countries that have international partnership agreements with EPA.

**Reference:**

Energy Star Program Requirements for Imaging Equipment Partner Commitments, “2. Prior to associating the ENERGY STAR name or mark with any product, obtain written certification of ENERGY STAR qualification from a Certification Body recognized by EPA for Imaging Equipment. As part of this certification process, products must be tested in a laboratory recognized by EPA to perform Imaging Equipment testing. A list of EPA-recognized laboratories and certification bodies can be found at [www.energystar.gov/testingandverification](http://www.energystar.gov/testingandverification).”

**Our requested changes:**

Specify when, where, and under what circumstances, products sold worldwide can be labeled.

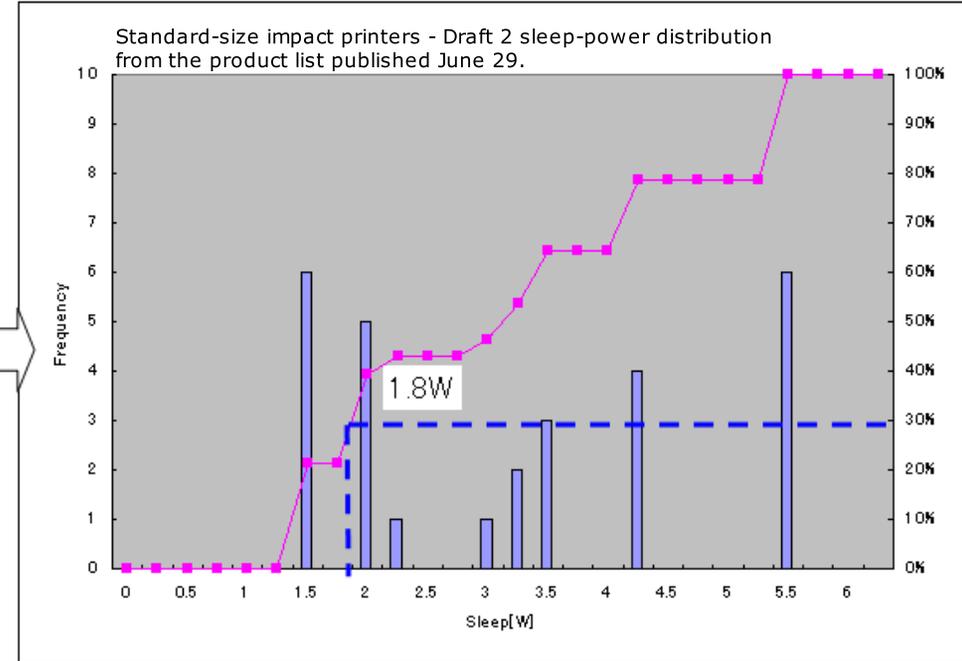
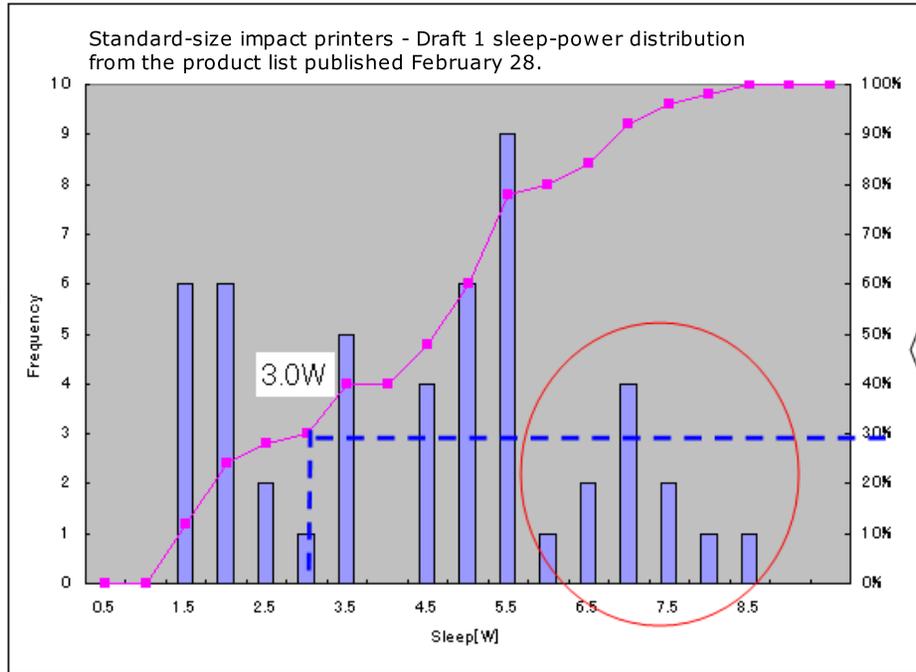
**Reasons:**

International partnership agreements have diverged in type, with self-declaration and third-party test systems in various partner countries. EPA should clarify this situation and provide guidance for international corporations.

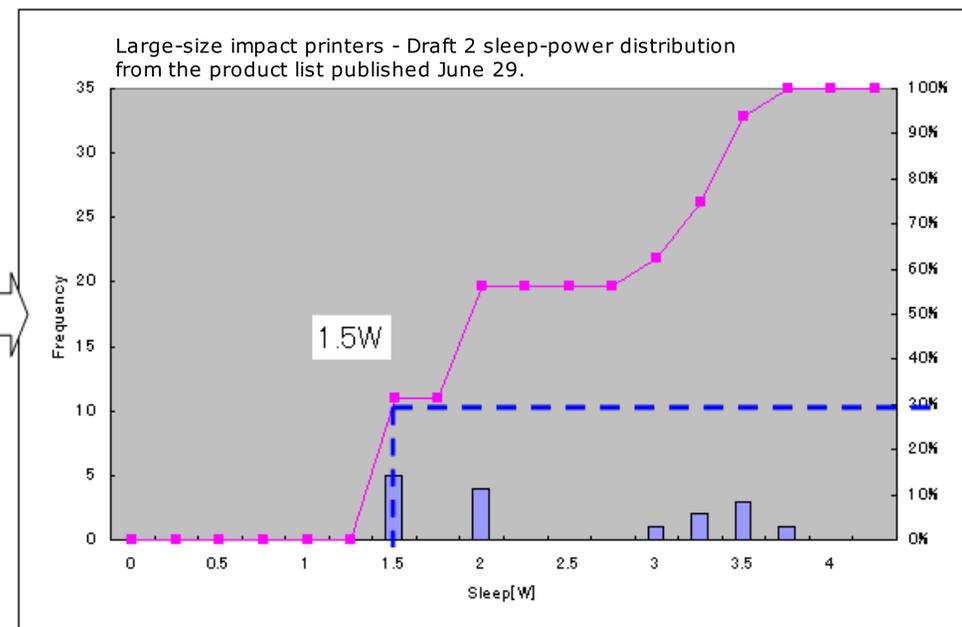
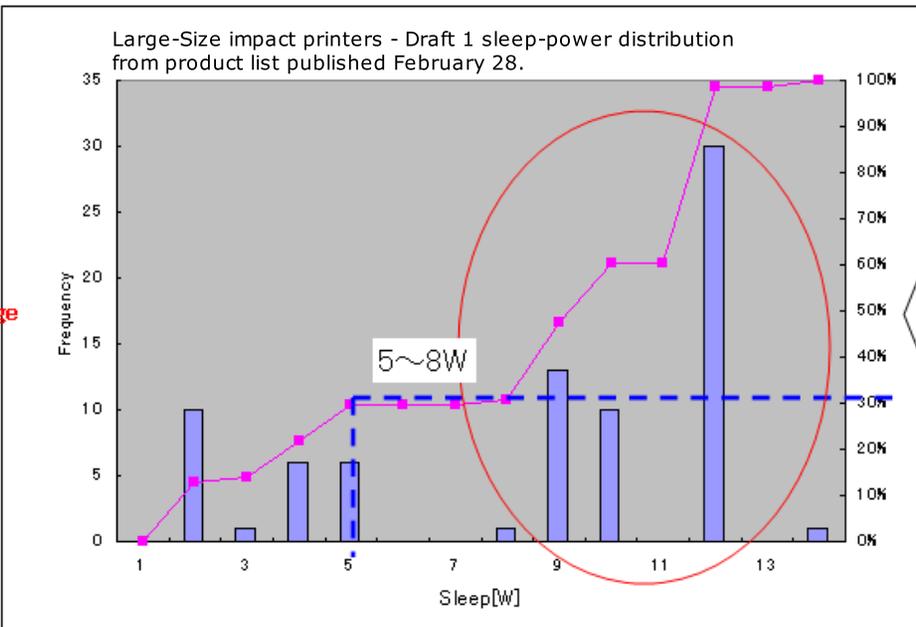
# Attachment A

Draft1

Draft2



Standard-size impact printers Draft 1 > Draft 2 showing a change to the data set. With models older than 2010 removed (red circle) the 30% level has decreased by 1.0W in Draft 2.



Large-size impact printers Draft 1 > Draft 2 showing a change to the data set. With models older than 2010 removed (red circle) the 30% level has decreased by 3.5~6.5W in Draft 2.

Impact-std

Impact-large