

Comments on EPA cover letter dated Feb. 15, 2013,
Concerning Revisions of ENERGY STAR IE Version 2.0 Final Draft

March 1, 2013

JBMIA Copier/MFD technology WG

JEITA Printer Energy-saving WG

1, DFE

Please clarify EPA's position as to the following case, which would represent one of DFE Qualification Scenarios.

(Scenario)

- An MFD device has been qualified to ENERGY STAR Ver 2.0.
- There is an optional Type1 DFE.

(Question 1)

When the MFD device and Type1 DFE are sold together, or, when Type1 DFE is sold after the MFD device has been sold;

Is the testing and qualification of "MFD device and Type1 DFE" required?

Also, is its registration as family products required?

In other words, if there is a Type1 DFE to be connected to an MFD device, is the qualification of "MFD device and Type1 DFE" required, regardless of how it is sold (a bundled DFE or an optional DFE)?

(Question 2)

When a Type1 DFE, which is sold afterward as an option, should not meet the DFE requirement, would the qualification of already installed MFD device be cancelled?

2, TEC Requirements

-Concerning dataset, many duplicated data should have been deleted from the EPA dataset dated 2013/02/04 to calculate the ultimate qualification rates. We strongly request that EPA share the corrected dataset with us.

-As we have reviewed EPA dataset dated 2013/02/04, there were erroneous data remaining even after we had pointed out these.

This should have been corrected much sooner, since the qualification rate of 30-39 ipm (Mono Non-MFD) was greatly affected, resulting in less than 20%.

From the standpoint of dataset reliability, it has been very frustrating, leaving the issue for the future.

The dataset issue has never received this much attention in the past.

In the background of this issue lies the ever increasing stringency in setting the criteria together with the fact that the room for further improvement is getting narrower and narrower after going through two revisions since the introduction of TEC in 2007.

Therefore the reliability of the basic dataset for setting criteria is crucial. Its importance continues to increase.

There are a lot of issues to be rectified such as data duplicates; errors; how to handle family product registration; handling of OEM products; collection of unqualified product data; and a wider collection of product data from the standpoint of international ENERGY STAR program.

With the above recognition, we strongly request that EPA ensure that best efforts be made to improve these issues of dataset toward the next revision. Toward that end, JBMIA and JEITA would like to cooperate with EPA as much as possible.

END