

Late comments on Product Specification for Imaging Equipment Eligibility Criteria Draft 1, Version 3.0

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1. 3.3.2 Typical Electricity Consumption

We think that Table 6: TEC Requirement and/or Equation of TEC Calculation need to be reconsidered.

[Reason]

JBMA conducted a survey regarding the pass rate of color printers of 11 Japanese manufacturers against the EPA's dataset "ENERGY STAR Draft1 Version 3.0 Imaging Equipment Data & Analysis Package-Revised". It turned out to be about 21%, a fairly low pass rate. Also, although there used to be certified devices with fairly low TEC values in Ver2.0, many of these devices cannot pass the proposed Ver3.0 criteria and a number of manufacturers would be unable to have a certified device at all in Ver3.0. This fact causes us to think that the concept of TEC requirement or Equation itself has significant problems.

2. 3.3.4 Recovery Time

(1) Equation 6: Recovery Time

Equation 6 needs to be modified. T

[Reason]

Taking the concept of recovery time into consideration, the time subtracted from $t_{Active1}$ shall be $t_{Active0}$, not $t_{Active2}$. The equation should be revised as follows;

$$t_R = t_{Active1} - t_{Active0}$$

(2) Table 7: Determination of Maximum Recovery Time (Minutes)

The concept of Table 7 is completely different from the referenced Blue Angel table. We think that an explanation is necessary regarding the reason why it has been changed from the Blue Angel framework.

If ENERGY STAR requires the same criteria as Blue Angel, a totally new test needs

to be added to ENERGY STAR.

END