

Comments on ENERGY STAR Product Specification for Imaging Equipment: Eligibility Criteria Draft 1, Version 3.0

April 10, 2018
Scanner working group,
Japan Electronics and Information Technology Industries Association

1. Line 406: Table 4: Maximum Delay Times to Sleep Adjustable by the User

<Comments>

Table 4 sets Maximum Delay Times to Sleep Adjustable by the User for either 60 min. or 120 min. depending on product speed. It is, however should be maximum 4 hours as the current standard. When the product is for business use (e.g. bank), where application for business-use has already been operating, the delay time changes in Table 4 will greatly impact their application and business.

<Reference: Europe>

- In German "Blue Angel" for example, because scanners have not been the target product for the certification, there is no harmonization necessary between ENERGY STAR and Blue Angel requirements.
- In Erp Lot6 (European Ecodesign Directive), delay times to off and standby mode can be changed by users unlimitedly, or delay times can be even disabled. This is because European Commission has taken maximum account of user conveniences. We believe that in ENERGY STAR also, user's convenience should not be impeded, where the adjustable range should not be limited significantly.

2. Line 539 - Line 585: 3.3.4 Recovery Time

<Comments>

Are "Recovery Time Requirements" targeted also for OM products? "Recovery Time Requirements" are not stated in **3.4** (Requirements for Operational Mode (OM) Products). In the meantime, **3.3** (Requirements for Typical Electricity Consumption (TEC) Products) states, "Therefore, EPA proposes a harmonized maximum recovery time requirement for both OM and TEC products" in Line 584 – 585. We thus would like EPA to confirm the targeted products.

If OM products are targeted, we disagree to add scanners to OM products because these requirements are not applicable for scanners in Blue Angel although EPA has proposed to harmonize the default delay time requirements with those in the Blue Angel. In the first place, we do not think that energy saving can be achieved by these requirements.

3. Line 630 Table 10: Maximum Off Mode Power Requirement

<Comments>

We oppose the EPA's proposal to assume "Maximum Off Mode Power Requirement" to be 0.3W.

"2019 EU requirement" has not come out yet as a draft version, and the enforcement schedule is undecided.

It is premature to discuss the adjustment with the Europe restriction under such a situation.