Comments on

ENERGY STAR Product Specification for Imaging Equipment

Eligibility Criteria Draft1 Version 2.0

JEITA Printer Committee / Printer Energy-Saving WG

line 143:

The expression “its own external ac power supply” should be revised as “its own ac power supply (internal or external)”, as symmetrical as line 133-134.

line 218:

There seems to exist no test method for Small format High Performance IJ. Since the current TEC is measured with A4/Letter size test chart, we have some concern as to how this small-format product should be tested?

line 261:

We would like to request to delete the whole specification of “Wakeup”.

If EPA could not delete it, a clearer and more detailed definition of “Wakeup” should be given. Since this is a “shall” specification, a product within TEC maximum value fails qualification, when it should wakeup for SNMP packets. This seems a bit unreasonable.

line 291:

As EPA has raised the problem in Fig4 of the discussion material on March 11, 2011, there are a number of apparently incorrect data of recovery time. Should recovery time data be provided to consumers, the reliability of the data must be ensured. Since the existing test method is not reliable enough to measure an accurate recovery time, JBMIA has proposed the following revision in the previous comments;

Option1 =Add a note

When a set-up sequence is carried out before the first print after power on, or, when it is ambiguous as to the start point of ready, carry out the second job immediately after the completion of the first job to measure and record time to first sheet exiting unit.

Option2=Modify the description of Step 3 as follows:

According to Table 11, carry out the specified job twice without intervention. The first job is a dummy copying (printing). At the second job, measure and record the time to first sheet exiting unit.

Please consider the above proposal.

line 298:

Automatic Duplexing Requirements should be kept the same as the current Ver 1.2 specification. Those models, which have been already launched for the market, cannot comply with the new requirement. Blue Angel harmonizes with the current Ver 1.2.

Besides, the new requirement urges users to buy more expensive products, since standard duplex products will carry costlier price tags than the products with optional duplex capability.

line 300:

The requirement of duplex should not be applied to OM products, as OM products with roll paper are incapable of duplexing.

line 382:

- Base data for Maximum TEC Requirement should not be only those of the qualified products in the latter half of 2011 but it should be those of all qualified products under ver1.1 plus non-qualified ones. Taking the duration period of the sales of one model into consideration, the data of only the latter half 2011 cannot reflect the actual total market, but it represents rather a partial group of recent achievement of high energy-efficiency. If the requirement is based on only such “good” data, it would be unfairly stringent to the general products.

- MFD and Copier/Printer should be categorized separately, since there are apparent differences in TEC values between the two product groups.

- The proposed requirements Ver2.0 astonishingly resemble those of coming Revised Japanese Energy Conservation Law, which is based on “top-runner” methodology, i.e. different from Energy Star approach of qualifying 25% best products. Besides, the target year of JECL is 2017. If almost the same level of energy efficiency should be required for ENERGY STAR in 2013, it would be apparent that only a minimal number of products could qualify, making the number of ENERGY STAR products drastically decrease. This, we deem, is not what EPA intends.

line 442:

In case of a model with fax capability, is the connection of fax interface mandatory during test?

line 445:

In case of a model without fax capability, is only one network connection allowed during test?

line 474:

The following is our understanding of internet functional adders. Is this correct?

1. Internet functional adders may be chosen up to two adders.

-In case of a model with fax capability, fax i/f and another interface, resulting in two interface adders.
-In case of a model without fax capability, two interfaces may be chosen other than fax interface, according to 3 and 4 below.

2. The number of interfaces in use during the test is only one.
3. A first interface can be chosen at the discretion of manufacturer without any specified priority.
4. A second interface is not connected but active.

Line 474

-The current Energy Star Cordless Handset takes about 1W in order to maintain appropriate electrical field strength to sustain communication in household. (That is to say, even the current allowance is not enough for cordless handset.) At least the allowance of 0.8W should be given for Cordless Handset, or the compliance to Ver2.0 is hard to attain.

-The allowance for Memory, we deem, should be “0.5W per 1GB” instead of “0.5W”.

line 506:

Since internal power supply cannot achieve 0.5W in low-load power, PSOR should not be deleted but be kept as Ver1.2.

line515:

Is Primary Functional Adder the same as Interface Functional Adder, Secondary Functional Adder being the same as Non-interface Functional Adder?

line 547:

Since ENERGY STAR is a specification concerning energy, the whole description of 3.6 should be deleted. If this is not accepted, we would like to propose the following;

1. Concerning 3.6.1 a complete harmonization to EU RoHS regulation is requested, including exemption specification.

<Reason>

The exemption specification of 3.6.1 does not cover all exemptions of EU RoHS. The uncovered part is impossible to rectify in the short period between Ver2.0 fix and effective date.

2. Concerning 3.6.3 the referred IEEE1680 should be replaced by EU WEEE as to the guideline of documentation of recyclable design. Also, even when EU WEEE should be referenced, the requirements should be limited only to “recycle percentage/recovery percentage.” Such requirements, as the establishment of recycle system within North America and product marking for differentiated collection (crossed-out dust bin mark), should not be adopted for ENERGY STAR requirement.

<Reason>

IEEE1680 seems to be the same as EPEAT. However, EPEAT standard for imaging equipment is not yet fixed as of today. It would be too early for ENERGY STAR Ver2.0 to refer to EPEAT. Also, there are required items as well as optional items in EPEAT. It is not clearly stated, which items are mandatory in ENERGY STAR Ver2.0. As such, the already fixed EU WEEE should be referenced as to the documentation specification.

Additionally, we have one question to EPA;
What kind of action should be taken, when the referred regulation is revised?

line 633:
There is no mention as to grand-fathering of ENERGY STAR Label. Must a product, which has been third-party qualified against Ver1.2 and has a lower TEC value than specified in Ver2.0, be tested and qualified by CB once more under Ver2.0?

line 640:
It is stated that “As of February 28, 2013 only those models, that have been third-party certified by an EPA recognized Certification Body will remain on the ENEGY STAR Qualified Product List.” Does this mean that such products remain on the list only on February 28, 2013 and be deleted on the next day March 1, 2013? Or is there any grace period prepared for such CB qualified products?

As EPA would be aware, there are now many “recycle models,” which is mostly based on conventional technology, i.e. not very energy efficient. These products are important for resource saving. We would like EPA to consider ENERGY STAR qualification of recycle products, with a bit modified energy-efficiency requirement.

END