

March 1, 2012

Christopher Kent
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RE: Panasonic Comments on ENERGY STAR Imaging Equipment Version 6.0

Dear Mr. Kent:

Panasonic appreciates the opportunity to comment on the ENERGY STAR Imaging Equipment Draft Version 2.0 spec. We have two primary issues with the proposed spec, as detailed below.

1. TEC limit for Multi-function devices (MFDs) is too tight. For example, in the case of a 24ppm black and white MFD, the current limit is 2.9 kWh while the proposed new limit is 1.682 kWh--a nearly 40% reduction. Panasonic proposes that the TEC limits be raised in order to allow a reasonable number of products (top 25%) to qualify. The proposed TEC limits will very likely disqualify far more than 75% of products on the market.

2. Auto duplex requirement for black and white MFDs is unnecessary and could deter some purchasers from buying ENERGY STAR qualified models. The requirement for auto duplex capability will necessitate extensive design changes for the most inexpensive, entry level MFD models. As the description implies, consumers are extremely price sensitive at the entry level and would likely balk at any increased costs to pay for auto duplexing, which would probably not be used. Manufacturers also would need to reassess whether ENERGY STAR qualification would be needed on models sold in this highly competitive, price sensitive market segment. In addition to adding on costs associated with product redesign, it would require longer than the proposed spec effective date for the product redesign to be completed. For these reasons, Panasonic strongly recommends the auto duplex requirement be made optional.

Thank you for giving Panasonic the opportunity to comment on this draft spec proposal.

Regards

Mark

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