

<Overall comment>

1. We object to test method changes in a time span of one or two months. Because the registration data of Version 2.0, such as TEC, cannot be used. We suggest not to change the test method when proceeding with the revision in the current EPA's schedule.

2. As we recall the history of Version 2.0 development, it took one and a half year for the investigation to implement rather minor changes to the test method of Version 2.0. The currently proposed changes would surely impact the test method much more significantly. Thus at least more than 1 and a half year is absolutely necessary to release drafts of the new test method and the new criteria Version 3.0. If test method changes on network activity, reconsideration of paper usage assumptions, the priority of Wi-Fi etc., it is necessary to grasp the changed data (such as TEC, etc.)

3. IF the test method is supposed to be revised. We strongly suggest that EPA revise the test method firstly, and then the draft including maximum limits.

Category	questions	Ricoh's comment
Network Activity	1. What is the easiest, most effective way to generate representative Simple Network Management Protocol (SNMP) requests?	An SNMP packet is transmitted by an operation such as acquisition of printer information (such as tray information) from the printer driver by a user operation. Also, SNMP packets are periodically sent even without user operation as described above.
	2. Does an increase in the number of devices on the network result in more "wake ups"? If so, by what specific mechanism(s)? EPA requests data in support of any responses to this question.	If the number of PCs connected to the network increases, the number of retrieval packets increases and the frequency of wakeup increases.
	3. What computer or network behaviors negatively impact the imaging equipment's ability to remain asleep?	In the case of a device / OS which frequently issues multi / broadcast packets of the device search system, "wakeups" frequency increases.
	4. Will there be any adverse impact on measurements for products with digital front ends (DFEs) if one of the proposed test method revision options is adopted?	We believe that there is no special impact on products with DFE.
	5. What specific user actions should be prescribed in option A to ensure that product behavior is tested against	<ul style="list-style-type: none"> · Open network list in Windows Explorer · Add PC to the network and push Startup button

	SNMP and other relevant data packet types?	<p>-Operation of driver(information acquisition operation from printer properties)</p> <p>However, the following items are important. Unless the OS (version) of the PC and the installed application etc. are prescribed, variations occur in the transmitted packets.</p>
	6.If option B is chosen, how can testers ensure that the required types of data packets are transmitted? Can this process be done without special software?	<p>A packet sending tool (multiple choices may be selected by a tester), a transmission packet file (defined as one), etc. are provided and executed by a tester. However, the following items are important. It is necessary to modify the IP address of the packet or specify the IP address of the device to be measured.</p>
	7.What proportion of the market can we expect to be impacted by the proposed test method revision options?	<p>The influence on devices is different according to the test method. At this stage it is necessary to grasp sufficient measurement data. Therefore, it should be implemented after revising the test method which need a sufficient period (at least 2-3 years or more) for development.</p> <p>1)In the case of Test method A High possibility to be affected greatly.</p> <p>2)In the case of Test method B The degree of influence changes greatly depending on the type of packet. Both Test method A and B cannot use the registration data of Version 2.0 because the TEC measurement value changes greatly.</p>
Paper Usage Assumptions	8,9,10	No opinions
Maintenance Modes	11.EPA requests feedback from stakeholders on the prevalence of this issue and encourages any available data on the frequency, duration, and power consumption of typical maintenance modes.	<p>We object to the change the condition of maintenance modes.</p> <p>Ricoh`s products conduct maintenance mode once or several times a day at the ordinary print volumes as well as low energy consumption.</p> <p>The timing of entering the maintenance mode depends on the user`s environment and print volume. The reproducibility cannot be secured. Therefore, it is difficult to set requirements for test methods.</p>
Standby Power	12.Do stakeholders believe that this change would add clarity to the	Ricoh agrees with the change of standby power definition, as this will make ENERGY STAR

Definition	ENERGY STAR specification?	specification clearer. However, the term should be determined with the consideration of harmonization with other international standards. The proposed “Lowest Power Consumption” should be examined from this point of view.
	13. To what extent, does making this change impact international harmonization?	We suggest that the definition and the maximum limits of standby power and off mode power should be harmonized with ErP Lot 6/26.
Professional Products	14. Does the proposal effectively differentiate professional products from commercial products for the purposes of the ENERGY STAR scope?	We deem that the proposed criteria can differentiate professional products from office products. Because item a professional products and commercial products are clearly distinguished from each other's catalog. Item a Output Print outputs are distributed or sold
	15.What data are stakeholders able to share related to the duty cycle of professional products?	No opinions
	16. Are there any other initiatives that EPA should consider that would allow ENERGY STAR to continue including these products within the scope of the program?	If Version 3.0 should excludes these products, they could not pass EPEAT, as EPEAT requires ENERGY STAR registration, This would be a hazard for such products. Adjustment is also necessary with the legislator/administrator of EPEAT. Products cannot be provided to customers (Institutional) who request ENERGY STAR.
Wi-Fi Connection Priority	17.EPA appreciates any feedback and relevant data on this topic, including whether the current set of OM networking allowances are appropriate for current hardware implementations.	No opinions
Scope and Additional Considerations	18.Is there stakeholder interest in ENERGY STAR expanding the category to include 3D printing within the scope of the specification?	3D printer is completely different from conventional imaging equipment for office. It should be investigated as a different category.
	19.EPA is interested in stakeholder feedback on the potential to exclude standalone fax machines, standalone copiers, digital duplicators, and mailing machines	We agree with exclusion of stand-alone copiers and standalone fax machines from the scope because of the few products. However, we object to exclusion of digital duplicator (DD) from the scope.

		EPEAT qualification is required for the procurement of products by the domestic institutions of the US government. Since EPEAT requires ENERGY STAR registration, if DD is excluded from the ES scope, DD products cannot acquire EPEAT qualification. This is unreasonable.
	20.EPA is aware of products on the market today that no longer utilize a cartridge, but rather refillable ink tanks, which are believed to reduce waste and be more sustainable. EPA is interested in learning more about these products as well as potential ways that EPA could encourage or highlight the adoption of these products.	We suggest that ENERGY STAR should not include such an environmental specification as ink/toner refill because refill is unrelated to energy consumption.
	21. Are there other best practices that ENERGY STAR could encourage or adopt within the imaging specification, such as alerts for users and/or limiting the maximum machine delay time for TEC products?	We agree adopt limiting the maximum machine delay time. The restriction on maximum machine delay time for TEC products are effective for energy saving.
	22.Others	In ES Version 2.0, the highest speed is claimed by manufacturers, we suggest that it should be decided more clearly like the German Blue Angel label. <Reference> Request for Blue Angel ISO or continuous printing