

(For Criteria draft1)

1. 1 DEFINITIONS 8) Professional Imaging Product c) & d)

In order to clarify the scope for Professional Product, we request the following revision.

c) Monochrome product speed equal to or greater than 86 ipm

→Monochrome product: Monochrome print speed equal to or greater than 86 ipm.

d) Color product speed equal to or greater than 50 ipm (if product is color capable)

→Color product: Color print speed equal to or greater than 50 ipm

[Reason]

“Monochrome product speed” of c) can be read as applicable to Color product, which conflicts with the description d). <Current specification requires for color product not only color speed (50ipm or more) but also B/W speed (86ipm or more).>

2. 2.2 Excluded Products ii Professional Imaging Products

In Ver 3.0 “Professional Imaging Products” are described as excluded products. There is also a description line 243 “EPA is maintaining the current scope in Draft 1”. We request that the EPA clarify how “Professional Imaging Products” are handled during the period between Ver 3.0 effective date and the next Ver 3.1(?) effective date, which specifies the criteria for “Professional Imaging Products”.

[Reason]

We are confused by the current description.

What happens to the products, which satisfy the definition of “Professional Imaging Products” in Ver 3.0? Are these products unable to carry ENERGY STAR mark? Or, can these products carry ENERGY STAR mark as Printer or MFD (in conventional manner), if they satisfy V3.0 TEC Requirement? Consideration should be made to ensure there will be no confusion in the market place for those models meeting V3.0 specification.

3. 3.3.2 Typical Electricity Consumption

(1) A3 adder

We request to maintain the current A3 adder.

[Reason]

Regarding the power consumption during printing it is apparent that A3 model takes more power than A4 due to the device configuration. This difference should be taken into consideration in specifying TECREQ value. In the past discussion the EPA

recognized this fact (See the following URL).

https://www.energystar.gov/sites/default/files/specs//ENERGY%20STAR%20Final%20Draft%20Imaging%20Webinar_FINAL.pdf

(2)Data set

We request that the proposed TEC be reconsidered, using Certified Product List.

[Reason]

According to the disclosed Dataset, it covers only products registered in 2015 and after. It should cover all current ENERGY STAR products including those registered before 2015,

V2.0 revision adopted the Dataset including all products listed in Certified Products List without any filtering based on the registration year. V3.0 should take the same approach to determine the criteria.

4. 3.3.4 Recovery Time

(1)Scope

OM products should be out of the scope of Recovery time requirement.

[Reason]

Validity of the standard has not been verified, and no test method has been established for OM products, it is not appropriate to apply the Recovery time criteria to them.

(2) Recovery time formula

It should be corrected to $t_r = (\text{active1 time}) - (\text{active 0 time})$.

[Reason]

Although $t_{\text{active 2}}$ is set as the time from sleep mode, Active 2 refers to the time from previous job on the test method. To be consistent with the test method, it should be corrected to $t_r = (\text{active1 time}) - (\text{active1 time})$.

5. 3.4.4 Off Mode Power Consumption

We request the limit value be 0.4W, harmonizing with Blue Angel.

[Reason]

This proposal (Maximum Off Mode Power 0.3W) is based on the revision draft of EU Lot6/Lot26. However, it is not yet fixed, i.e. EU committee has not yet certified the new criteria. Further, the actual effective date of the new criteria (0.3W) is proposed to be two

years after the revised regulation becomes effective.

(For Test Method draft2)

1. 4 TEST SETUP Table 4

For Taiwan A4/70g/m² is now specified. However, the conventional LTR/75g/m² should be specified additionally.

[reason]

In Taiwan A4/70g/m² is dominant in general market. However, LTR/75g/m² is used in a part of government office.

2. 7.2 Measurement Procedures Table 8 & Table 9

Regarding the unit of measure for “Active1 time”, “Active2 time” and “Active2 time” in Table 8 and Table 9, the current “minute” should be changed to “second”.

[reason]

The items corresponding to the above three times use “second” as designation unit in “View Certified Imaging Equipment”.

”Active0 time” → “Print/Copy Time from Ready State (s)”

”Active1 time” → “Print/Copy Time from Sleep State (s)”

”Active2 Time” → “Print/Copy Time from Previous Job (s)”

Unit of measure should be in line with what is used here. Since the actual measurement is done with “second”, conversion to “minute” should become unnecessary and you can get rid of errors due to conversion.

3. Comments on Professional Imaging Products

While the test method of Professional Imaging Products basically is built on ISO 21632, it is recommended to be customized for ENREGY STAR where necessary.

Since it takes time for detailed examination, late comments will be submitted separately.

(Other)

We request EPA to clarify its basic approach/policy/positioning when addressing revision process – what is the “rule of thumb” when designing revised specification based on the current data set.

[Reason]

We believe that high-quality discussions will be possible in the future, by grasping the EPA’s logic for standards development process.

Please tell us which population (according to product categories, print speed, or color capability) is adopted EPA revision policy (top 25% products of the market is certified

standard) .

End