

Section	Current draft text	Proposed amendments <i>(Shown in italic, red font)</i>	Reasons of our proposals
<p>Draft version 2 of <u>Partner Commitments</u> Page 1, Section 3.</p>	<p>3. Ensure that any model associated with the ENERGY STAR name or mark meets the following standards:</p> <ul style="list-style-type: none"> <li>- The generally accepted material restriction of hazardous substances (RoHS) ...(omitted)... Batteries are exempt.</li> <li>- The generally acceptable attributes of a recyclable product at the date of product manufacture: where products shall be designed for ease of disassembly and recyclability where external enclosures, sub-enclosures, chassis and electronic subassemblies are easily removable with commonly available tools, by hand, or by a recycler's automated processes.</li> </ul>	<p><i>We think that the whole Section 3 should be deleted.</i></p>	<p>EPEAT for imaging equipment is adopted and waiting for publication. The requirement related to section 3 on the draft has been discussed for inclusion within EPEAT (prohibition of some substances &amp; recyclability).</p> <p>EPEAT will be considered as one of public procurement standards like ENERGY STAR. We think that ENERGY STAR’s focus should be (limited) energy saving and efficiency, based on the original concept.</p> <p>If such requirement other than energy saving needs to be incorporated into the ENERGY STAR, we think that it should be further discussed with the partner with future direction of the ENERGY STAR specification. At this moment, we do not think that the issue is sufficiently discussed with partner and it will be premature to include it in the Partner Commitment Version 2.0.</p>
<p>Draft version 2 of <u>Partner Commitments</u> Page 1, 2<sup>nd</sup> dot of 3.</p>	<p>The generally accepted material restriction of hazardous substances (RoHS) regulations including exemptions in force at the date of product manufacture: where the maximum concentration values tolerated by weight in homogeneous materials are: lead (0.1%), mercury (0.1%), cadmium (0.01%), hexavalent chromium</p>	<p><i>As mentioned above, we think that the whole 3 should be deleted. However, if section 3 needs to remain, the following sentence should be inserted before the last sentence of 3 (Batteries are</i></p>	<p>All exemptions under RoHS Directive should be referenced here to clarify the requirement. However, current text doesn’t refer to any exempted applications. According to the “Note” of previous draft 1 of the specification, EPA has an intention to be consistency with EU RoHS directive. Therefore, instead of referring to all the exemptions, we</p>

Section	Current draft text	Proposed amendments <i>(Shown in italic, red font)</i>	Reasons of our proposals
	(0.1%), polybrominated biphenyls (PBB) (0.1%), or polybrominated diphenyl ethers (PBDE) (0.1%). Batteries are exempt.	exempt). <i><u>When a model meets the current EU RoHS Directive 2011/65/EU, such model shall be considered as compliant to this commitment.</u></i>	propose that a model shall be considered as compliant to this commitment if it meets EU RoHS Directive 2011/65/EU.
Draft version 2 of <u>Eligibility Criteria</u> Page 9 of 20 3.3.1 <u>Automatic Duplexing Capability</u>	i. For all copiers, MFDs, and printers subject to the TEC test method, automatic duplexing capability shall be present at the time of purchase as specified in Table 3.	<i>We request to add the following as exceptional clause after current text:</i> <i><u>Printers intended to print on special single-sided media, such as release coated paper for label sticker paper, small-sized cut media and direct thermal media, are exempted from 3.3.1.</u></i>	The requirement applies to all TEC copiers, MFDs, and Printers. However, we believe that the requirement shall not apply to printers for special media that duplexing printing is not originally intended and/or cannot be applied. Therefore, printer for such special media shall be excluded from the requirements on automatic duplexing capability. As an examples, such special media is release coated paper for label (i.e. label sticker paper), and such reverse side of the media will be discarded after peeling the label side.
Draft version 2 of <u>Eligibility Criteria</u> Page 9 of 20 3.3.1 <u>Automatic Duplexing Capability</u> , Table 3	Monochrome Product Speed, s, as Calculated in the Test Method (ipm) Automatic Duplexing Requirement s ≤ 26 None s > 26 Integral to the base product	<i>For middle range products, automatic duplexing should be optional as current Ver1.2 should be kept as unified criteria in the next version as follows:</i> <b>s</b> ≤ 26:None 26 < <b>s</b> < <i><u>45: Integral to the base product or offered as an optional accessory</u></i> <b>s</b> ≥ 45: Integral to the base product	The draft criterion was moderated to above 26 ipm, and we can understand and agree with EPA's intention to unify the requirements for color and monochrome products. However, we believe that design options for middle range products (below 45 ipm; this is based on current criteria for monochrome products) should be kept as current criteria. That is, automatic duplexing requirement for products with medium print speed should be "Integral to the base product or offered as an optional accessory" in considering their typical usage. Some users of middle range products don't need automatic

Section	Current draft text	Proposed amendments <i>(Shown in italic, red font)</i>	Reasons of our proposals
			<p>duplexing. In general, manual duplexing is available for copying-function and printers have already had “n in 1” functions. However, if the automatic duplexing is required for such class of products, the price of the products would be raised due to equipping automatic duplexing and as a result, would cause disadvantage for such users.</p> <p>We believe that various design options should be allowed in order to meet various users’ needs as much as possible.</p>
<p>Draft version 2 of <u>Eligibility Criteria</u> Page 12 of 20 , 3.3.2 <u>Typical Electricity Consumption</u>, Table 4</p>	<p>Monochrome MFD  <math>50 &lt; s \leq 80 \quad (s \times 0.25) - 8.15</math>  <math>s &gt; 90 \quad (s \times 0.6) - 36.15</math></p>	<p>Monochrome MFD  <math>50 &lt; s \leq 80 \quad (s \times 0.25) - 8.15</math>  <math>s &gt; 80 \quad (s \times 0.6) - 36.15</math></p>	<p>We suppose that “s &gt; 90” would be typo of “80”, because, “80 &lt; s ≤ 90” would become blank under current proposed Table 4.</p>
<p>Draft version 2 of <u>Eligibility Criteria</u> Page 15 of 20 , 3.3.4 <u>Sleep Mode Power Consumption</u>, Table 6</p>	<p>Product Type: Scanner  <math>P_{MAX\_BASE}</math> (watts): 2.5</p>	<p><i>The <math>P_{MAX\_BASE}</math> of scanners should be “2.7” as proposed in previous draft:</i>  Product Type: Scanner  <math>P_{MAX\_BASE}</math> (watts): <u>2.7</u></p>	<p>The wattage allowance for base engine of scanner is reduced up to 2.5 W by using only qual models (limited market share), according to the Note (page 16). However, it is very unclear how the allowance level was analyzed, and it is not reasonable to reflect such limited analyses on the wattage allowance as applies to overall scanners.</p> <p>Furthermore, although models older than 2010 were removed from the data set, the sale cycle of scanners is typically 3 years. Therefore, we believe that data set should cover at least the models after 2009.</p> <p>As mentioned above, we believe that 2.7 W on the Draft 1 is appropriate for the base engine of scanners set as estimated</p>

Section	Current draft text	Proposed amendments <i>(Shown in italic, red font)</i>	Reasons of our proposals
			30% conformance rate according to the material used at the Draft 1 Stakeholder meeting.
Draft 1 Page 19 of 20 6.1.1 <u>Effective date</u>	The Version 2.0 ENERGY STAR Imaging Equipment specification shall take effect on July 1, 2013.	The Version 2.0 ENERGY STAR Imaging Equipment specification shall take effect on <u>April 1, 2014</u> .	<p>We believe that 18 months should be allowed as grace period for implementation under the new specifications after publishing the new specifications.</p> <p>As compared with version 1.2, the test methods for OM and specifications will be drastically changed on version 2.0. However, the preparation period will be only 9 months in case of the following schedule:</p> <p>October, 2012: “the specifications will be fixed”</p> <p>September, 2013: “the specifications will be effective”.</p> <p>However, during such extremely short period, it will be impossible for manufacturer to develop qualified products under the new specifications. At least, we believe that 18 months will be needed as the grace period.</p> <p>Moreover, regarding the test and qualification of products, we think that Certification bodies and/or Laboratories also have to prepare and address for the new test methods and new specifications, and then they have to handle the tests and certification for a lot of products including current existing models to be re-tested and re-certificated. We think that 9 months will be insufficient for them to prepare for all, and 18 months at least will be needed.</p>
Draft 1 Page 19 of 20 6.1.1 <u>Effective date</u>	As of July 1, 2013 only those models that have been third-party certified by	<i>As mentioned above, we think that 18 months should be allowed as</i>	As mentioned above, we think that 18 months should be allowed as grace period after publishing the new

Section	Current draft text	Proposed amendments <i>(Shown in italic, red font)</i>	Reasons of our proposals
(Note: Line634-636)	an EPA recognized Certification Body will remain on the ENERGY STAR Qualified Product List.	<p><i>grace period after publishing the new specifications. However, if it is not accepted, we would like to request following measure for relief included in 6.1.1:</i></p> <p><u><i>A TEC model which has earned ENERGY STAR Product Specification for Imaging Equipment Ver.1.1 and whose data have already met the criteria of Ver.2.0 prior to introducing third-party certification can continue to use previous data without third-party certification for re-qualification of the model for Ver.2.0.</i></u></p>	<p>specifications. However, if it is not accepted, we would like to request some transitory measures.</p> <p>According to the draft, model registered in Version 1.1 prior to introducing third-party certification is required for third-party certification / measurement after starting Version 2.0. However, for some product types currently have a significant number of qualified products. If many models need to be re-qualifies, the manufacturers have to bear a huge amount of cost for the re-qualification.</p>