Information Technology Industry Council

TO: **Chris Kent**
U.S. Environmental Protection Agency (EPA)

FROM: **Ken Salaets**

DATE: **July 30, 2012**

SUBJECT: **ITI comment on Imaging Equipment v2.0 Draft 2.0**

The Information Technology Industry Council (ITI) appreciates the opportunity to submit comments on the reference subject. ITI member companies have worked diligently on developing products that meet the current and previous ENERGY STAR® specifications. We trust that the partnership that we have developed with EPA over the years will continue as we move toward finalization of version 2.0 and beyond.

As always, we welcome EPA posting these comments on the program web page, and would be happy to respond to questions from agency staff, consultants and other interested parties. Our comments follow.

General Comments

Toxicity and Recyclability Requirements (Section 3.6)

ITI appreciates the EPA working with industry on implementing non-energy attributes (NEAs) in ways that can work for industry. However, it is critical that the NEA related to ROHS requirements be tied explicitly to the European Union's ROHS directive. To accomplish this, ITI recommends the following changes:

> "The European Union's generally accepted material restriction of hazardous substances ~~(RoHS)~~ regulations (RoHS Directive 2011/65/EC), including exemptions in force…"

Technical Comments

ITI also offers the following specific comments on V2.0 Draft 2.0.

Section	Current text	Proposed Changes	Reasons of our change
Pg 5, line 175	Changes to product family definition	None	Changes to the product family are appreciated.

Pg 9, Line 326	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.	We request to add the following as exceptional clause after current text: Printers intended to print on special single-sided media including media only for the purpose of single side printing, such as release coated paper for label, sticker paper, small-sized cut media and direct thermal media, are exempted from 3.3.1.	The requirement applies to all TEC copiers, MFDs, and Printers. However, ITI believes that the requirement should not apply to printers for special media where printing on both sides of the media is not part of the products intended function.
Draft version 2 of Eligibility Criteria Page 9 of 20 3.3.1 Automatic Duplexing Capability, 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	*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:* ***s*** ≤ 26:None 26 < ***s*** < *45: Integral to the base product or offered as an optional accessory* **s** ≥ 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 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. We believe that various design options should be allowed in order to meet various users' needs as much as possible.
Pg 12, Line 412	Speed range for Monochrome MFD	Last line should read "> 80" rather than ">90"	
Pg 12, Line 412	TEC Limits in Table 4	None	ITI appreciates the differentiation in TEC limits between Single Function and Multi-Function Products.

Pg 12, Line 414	EPA intends to display the TEC values of ENERGY STAR qualified Imaging Equipment in both the Kilowatt-hours per year and kilowatt-hours per week on the qualified products list (QPL) for easier comparison to other ENERGY STAR products, which typically express energy consumption in annual terms.		ITI does not support use of the TEC metric as an annual electricity value without disclaimers about the high usage assumptions in the TEC test. We are concerned that the high printing assumption as well as the disabling of auto-off features for testing will artificially increase the energy estimates of Imaging Equipment when compared to other equipment.
Pg 13, Line 432	Since recovery time (Active1 time) and Default Delay Time to Sleep are useful to consumers and potentially a useful parameter for evaluating the impact of the Version 2.0 requirements on usability, EPA proposes to require reporting of both recovery time (Active1 time) and Default Delay Time to Sleep for all TEC products.	Add Active 0 and Active 2 times also	If the EPA is intent on publishing Active 1 times, ITI recommends publishing Active 0 and Active 2 times also. This gives the consumers a full comparison of product data.
Page 15 Table 6	Product Type: Scanner P_{MAX_BASE} (watts): 2.5	*The P_{MAX_BASE} of scanners should be "2.7" as proposed in previous draft:* Product Type: Scanner P_{MAX_BASE} (watts): 2.7	The wattage allowance for base engine of scanner is reduced up to 2.5 W by using only qualified 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. 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. As mentioned above, we believe that 2.7 W on the Draft 1 is appropriate for the base engine of scanners set as estimated 30% conformance rate according to the material used at the Draft 1 Stakeholder meeting.

Page 15 Table 6	Product Type: Mailing Machine P_{MAX_BASE} (watts): 5.0	*The P_{MAX_BASE} of Mailing Machine should be "5.6" as proposed in previous draft:* Product Type: Mailing Machine P_{MAX_BASE} (watts): 5.6	The wattage allowance for base engine of Mailing Machine is reduced up to 5.0 W by using only qualified 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. Furthermore, although models older than 2010 were removed from the data set, Mailing Machine has a relatively-long product cycle, more than 5 years. As mentioned above, we believe that 5.6 W on the Draft 1 is appropriate for the base engine of Mailing Machines set as estimated 30% conformance rate according to the material used at the Draft 1 Stakeholder meeting.
Page 17 Table 7	Adder Type: Interface Connection Type: Fax Modem Details: Applies to MFDs only.	*This should not be limited only to MFDs. Other product categories having a modem should be covered.* Adder Type: Interface Connection Type: Fax Modem Details: Applies to any products having a modem.	We think the modem allowance should not be limited only to MFDs. There are other product types having a modem besides MFDs. Therefore, this allowance should apply to all product categories having a modem as an interface.

Draft 1 Page 19 of 20 6.1.1 Effective date	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 April 1, 2014.	We believe that 18 months should be allowed as grace period for implementation under the new specifications after publishing the new specifications. 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: October, 2012: "the specifications will be fixed" September, 2013: "the specifications will be effective". 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. 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.
Page 19 Line 634-636	As of July 1, 2013 only those models that have been third-party certified by an EPA recognized Certification Body will remain on the ENERGY STAR Qualified Product List.	*As mentioned above, we think that 18 months should be allowed as grace period after publishing the new specifications.*	As mentioned above, we think that 18 months should be allowed as grace period after publishing the new specifications. However, if it is not accepted, we would like to request some transitory measures. 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.
Other		*ITI is not opposed to the EPA considering allowance or credit for remanufactured products.*	

Finally, we would like to address the issue of timing. As we discussed in last week's EPA/ITI conference call, in order to minimize disruptions in existing product shipments and new product rollouts, manufacturers need to have the ability/opportunity to qualify products to the latest version of ENERGY STAR product specifications *prior* to the effective date. Currently, program requirements prevent this.

This is critical for several reasons:

- EPA does not allow the grandfathering of qualified products, forcing manufacturers to re-qualify eligible products under a revised specification
- Revisions to product specifications typically involve many technical changes, including new product categories, limits, adders, etc., which require time and resources to implement; and
- Manufacturers are unable to "transition" to new requirements in a single day, i.e., when a revised specification is officially published, due to the limited CB capacity and the duration of qualification tests, posing risks of market disruptions and lost revenues (both major impediments to maximizing participation in ENERGY STAR).

Similarly, as was discussed in the recent in-person meeting, industry requests that ENERGY STAR post-market surveillance be suspended once a new revision has been published, and not be resumed until after the relevant new effective date. This is essential for several reasons:

- As noted above, all models currently qualified under ENERGY STAR must be re-tested to the new specification once the test labs and CBs are capable of doing so
- It would be costly and meaningless to require current models that can meet and are subsequently qualified under a newly-revised, more stringent specification to be tested to verify compliance with a previous and soon-to-be obsolete older version of the product specification; and
- Manufacturers and test labs will no longer be able to re-test models under the current version of a product specification because they will be changing over their internal validation tools to prepare for the new version.