Comments on ENERGY STAR Imaging Equipment V3.0 Professional Test Method Draft 2

2018.12.13

Manufacturer	Line number	items	Background	Proposition
Ricoh	13	**4.1 General Test Setup**	Since the setting value of default delay time to sleep of UUT may interfere with the testing, appropriate description should be added.	We propose to add the following description after LINE173. "If the setting value of default delay time to sleep of UUT would interfere with the testing, the setting value should be changed or the feature should be disabled."
Ricoh	232	**Table6 Step 2**	Measurement action is missing.	Correct the description as follows. Zero the meter, measure energy and record time to trailing edge of first page reachs exit point.
Ricoh	232	**Table6 Step 5**	Typo shall be corrected.	Typo shall be corrected. "Production print 2 energy"
Ricoh	232	**Table6 Step 6**	Typo shall be corrected.	Typo shall be corrected. "Production print 3 energy"
Ricoh	232	**Table6 Step 7**	Since the contents of action is ambiguouse, mearuement action should be added.	Add the following description in the Action. Zero meter and timer. Measure energy over 5 minutes or more. Record both energy and time.

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Ricoh	307, 31	7.2 Measurement Procedures	1. Current Problem Stakeholders cannot guarantee that "Ready state (state capable of printing without delay)" for several products before measurement Active 0 Time. 2. Cause Due to the initial installation of application software. 3. Concerns The following concerns arise due to the influence of Active 0 Time measurement. (i) Increasing burden and cost on industry by the confirmation of measurement validity and re-test at the time of measurement failure Occurred (ii) If Stakeholders do not notice the measurement failure, the recovery time will be shorter than expected, and resulting in divergence from the actual value. It will be potentially confused the customers, and stakeholders need to new information disclosure by setting disclaimer, and occurred additional burdens and cost over the long term No re-test will occur in products that were able to reliably measure Active 0 Time from Ready. So if this proposition is not adopted, there will be a possibility of increasing burden and cost against stakeholders over the long term 4. Proposed Countermeasures Single sheet dummy printing to obtain a	Add the following note below Table 8: Step 2: In order to obtain a stable Ready State, printing one output image may be performed if necessary. Add the following note below Table 9: Step 2: In order to obtain a stable Ready State, copying one image may be performed if necessary. *We will withdraw this proposal if EPA allows nonconformity regarding Maximum Recovery Time (3.3.4 tR_max) requirement in the post-market verification testing.

Manufacturer	Line number	items	Background	Proposition

Comments on ENERGY STAR Imaging Equipment V3.0 Specification Final Draft

Manufacturer	Line number	items	Background	Proposition
Ricoh	348 500	3.2.5 Default Delay Time Requirements for Non-Professional Imaging Products Table 3 3.3.4 Recovery Time Table 7	In the case of a laser printer with 6 ≦ ipm ≦ 10, required Default Delay Time to Sleep for OM and TEC Products in Table 3 is 5 minutes or less, whereas in Table 7, request 10 minutes to 15 minutes for them. But models whose Default Delay Time to Sleep designated above value, don't comply with table 3, so there is no necessity to clearly show it as a requested value.	Request to revise the Table7 to be easy to understand not to change the qualification rate, such as describing Table 7 separately for each product category, or only describing the boundary value of Default Delay Time to Sleep for determining the recovery time request formula.