

ENERGY STAR V3.0 Imaging Equipment Draft 1 Version 3.0 Specification - Comments from Seiko Epson Corporation

Thank you for providing us with the opportunity to submit our comments on the Draft 1 Version 3.0 Specification and Draft 2 Test Method. For many years, we have tried to reduce the energy consumption of our products and have distributed many Energy Star certified products. We hope this revision will produce positive outcomes for all stakeholders.

3.2.1 External power supply (EPS):

We do not believe that the level VI requirement is appropriate for Energy Star. The requirements for external power supplies should not be changed.

- The intention of the change by the EPA is to harmonize U.S. federal energy conservation standards. However, the requirements of 10 CFR Part 430 are for consumer products only. The Energy Star standard for imaging equipment, on the other hand, covers commercial products and industrial products as well as consumer products.
- Only the U.S. has adopted the Level VI requirements, the world's strictest. Energy Star is the most widely recognized symbol for energy efficiency in the world. For this reason, it is not appropriate to refer to U.S. federal standards for Energy Star requirements.

3.3.4 Recovery Time:

EPA proposes a maximum recovery time requirement for both OM and TEC products to harmonize with Blue Angel requirements. However, Blue Angel and Energy Star prescribe different measurement procedures and cover different products. For this reason, the recovery time requirement should be removed.

- The waiting time from the end of the last printing process to the start of measurement is not the same. Laser printers require a warm-up time to print. The difference in measurement methods will produce different results, causing customer confusion.
- Energy Star covers more products than Blue Angel. For example, Energy Star covers scanners, but Blue Angel does not. Recovery time should be determined by measuring the time it takes for the first sheet to exit the unit from sleep mode/off mode. As you can easily imagine, measuring the recovery time of flatbed scanners is impossible because flatbed scanners do not have paper feed functions. It is also impossible to evaluate the recovery time for products that do not use a cut-sheet media, such as products that print bar codes, labels, receipts, banners, and engineering drawings.

3.4.3 Sleep Mode Power Consumption:

We can accept the proposal, in which current requirements remain the same. We do not think that sleep mode power consumption has to be harmonized with other programs.

- As mentioned above, Energy Star covers more products than Blue Angel. Products not covered by Blue Angel, such as large format printers, consume more power than office equipment.
- ErP directive (EC) No 1275/2008 sets the requirements for electronic household and office equipment only. For example, many POS products (commercial equipment) are Energy Star certified but ErP doesn't

cover them. Moreover, networked standby requirements do not apply to large format printers. We therefore do not think harmonizing them with ErP is appropriate.

3.4.4 Off Mode Power Consumption:

EPA proposes a 0.3W requirement in line with the ErP directive, but the revision of the ErP directive has not yet been finalized, and the revised requirements would come into force two years after the revision, in around 2021.

The Energy Star Version 3.0 specification will become effective sometime in the second or third quarters of 2019. EPA should consider the harmonization with the ErP directive at the next revision rather than now. As with other requirements such as the sleep mode default delay time, we believe a 0.4W requirement, harmonized with the Blue Angel requirement, would be reasonable.