



December 13, 2018 Revision

To: Ryan Fogle, EPA Manager, ENERGY STAR for IT and Data Center Products;
Matt Malinowski, ICF International

Re: ITI Comments on ENERGY STAR Imaging Equipment Version 3.0 Final Draft

Thank you for the opportunity to comment on the ENERGY STAR® Imaging Equipment Version 3.0 Final Draft Specification and Test Procedure.

Final Draft Specification

Section 3 – Certification Criteria

- In section 3.2.5, t_{DEFAULT} and t_{SLEEP} are used interchangeably, as are $t_{\text{DEFAULT_REQ}}$ and $t_{\text{SLEEP_REQ}}$. We recommend use of consistent terminology throughout.
- We recommend changing TEC_{2017} to TEC_{2018} throughout.
- In section 3.3.2, we believe TEC_{REQ} should be TEC_{MAX} .
- Based on the EPA's comments, we believe the intent was to round the reported TEC to 0.01, but in the details of equations 3 and 6, it still indicates to round to 0.1.
- Equation 6 details reference Table 11, but we believe it should reference Table 6.
- Tables 9 and 10 should be either mono or color.

Section 3.3.4.iii (Seeking clarification)

Is it correct to assume the following scenario is accurate? A 25ppm MFD with a default sleep delay of 40 minutes (acceptable per Table 3) is not subject to a recovery time requirement based on Table 7?

Verification testing - Test Variability

With the new Version 3 formula, a very slight variation in sleep power of only 0.1 W has an impact of approximately 0.016 kWh/wk (depending on print speed). A minor difference in power supply efficiency can cause a change of this magnitude, accounting for as much as a 6% difference in the resultant TEC measurement. Based on this and the very low TEC limits in v3.0, industry believes some allowed margin during verification testing is reasonable. Similar to test variability margins in the EU, industry recommends a margin or test variability allowance of 10%.



Re-Testing

Topic	Subtopic	Comment	Response
Re-Testing		One stakeholder commented that specification revisions in the past have resulted in significant re-testing, and recommends that EPA give instructions to labs and CBs outlining how V2.0 test results can be recalculated to demonstrate compliance with V3.0 requirements.	EPA can provide a calculator along with instructions to CBs convert current test results into the new metric to avoid any additional testing and reduce recertification burden.

We thank the EPA for providing a calculator and instructions to certifying bodies (CBs) to reduce testing burden, we believe it will be quite helpful. Industry seeks clarification on the following items:

- When will EPA provide the mentioned ‘calculator’ to CBs? And by extension, when will industry be able to begin certifying products to v3.0?
- In the past, we were able to begin certifying to v2.0 immediately once the final spec was published. Will this be the case for v3.0?

Test Method

Tables 8 and 9

As noted in the Specification, similarly in Tables 8 and 9 of the Test Method, t_{DEFAULT} and t_{SLEEP} are used interchangeably. We recommend use of consistent terminology throughout. Additionally, Tables 8 and 9, sleep is said to require measurement over one hour, but the sleep time specifies ≤ 1 hour. Industry seeks clarification if it’s required to measure for a full hour.

Sincerely,

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