

July 24, 2020

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U.S. Environmental Protection Agency
202-343-9153
Via: imagingequipment@energystar.gov and E-mail: Fogle.Ryan@epa.gov

Subject: ENERGY STAR Program for Imaging Equipment proposed Version 3.1

Dear Ryan:

I am writing to you on behalf of the Information Technology Industry Council (ITI). The Information Technology Industry Council (ITI) represents 70 of the world's leading information and communications technology (ICT) companies from all corners of the technology sector, including hardware, software, digital services, semiconductor, network equipment, and internet, as well as "technology-enabled" companies that rely on ICT to transform their businesses. Promoting innovation worldwide, we engage with governments and associations around the globe to share information and work collaboratively to develop effective policy approaches that enhance cybersecurity, protect privacy, enhance energy efficiency, and enable businesses to thrive in an ever-changing and dynamic global market.

I am sharing some questions and concerns regarding EPA's proposal to issue a new V. ENERGY STAR 3.1 for Imaging Equipment.

First, ITI requests that EPA not change the version number from v 3.0 to v3.1. Instead, we request that EPA simply note the minor revision with the addition of a new date to V3.0. This was done more than once for v2.0 as can be seen in the images on the following page. Industry strongly believes a move to v3.1 will cause considerable confusion for customers. Those customers will inevitably demand v3.1 certificates and no longer accept existing v3.0 certificates, despite guidance from EPA that 'Currently certified products are not affected' by this change. There is considerable potential for real disruption in the market, particularly with enterprise customers, which can easily be avoided with the addition of a date rev to the current v3.0.



ENERGY STAR®
Product Specification for Imaging Equipment

Eligibility Criteria
Version 2.0



ENERGY STAR®
Product Specification for Imaging Equipment

Eligibility Criteria
Version 2.0
Rev. Sep-2014



ENERGY STAR®
Product Specification for Imaging Equipment

Eligibility Criteria
Version 2.0
Rev. Oct-2014

Second, ITI has two requests regarding the requirement in 4.2.3 to make remanufactured products have a unique model name.

- It appears that the goal of this revision is to have the energy efficiency performance of the remanufactured product be equivalent to a newly manufactured product. Assuming that is the case, we would prefer that:
 1. The existing certificates cover both the new and remanufactured models, allowing but not requiring a unique model name.
 2. The manufacturer be allowed to make the decision on how they will differentiate the remanufactured product (e.g. a unique part/order number, a label on the product, etc.).

Third, with respect to the statement in the “Note” for 4.2.3 that the remanufactured products be tested separately from newly manufactured products,

- Our members’ prefer to allow verification by design. For example, engineering tests can confirm if replacement of key energy-related components—such as the fuser—result in equivalent TEC performance. If that is the case, remanufactured printers could be considered energy-

equivalent to new with those key energy-related components replaced, without having to be officially recertified.

Fourth, our members would like to point out that remanufacturing used products allows partners to provide additional eco-friendly options to customers. To make this path-to-market as accessible as possible, it is important not to over-burden manufacturers through regulatory limitations. If a partner chooses to make available a remanufactured product that is not expected to be exactly like new in every way and is marketed as such, only the most necessary requirements should be considered when it comes to Energy Star. A customer can then decide if they want an energy-efficient printer that is remanufactured vs. an energy-efficient new printer.

Fifth, the definition of “Remanufactured Imaging Equipment” should be limited to items related to energy efficiency and energy performance. We request that, any items outside of that scope be left for the manufacturer to determine they meet their customer's requirements.

Some of the requirements in the “definition” fall outside the scope of energy efficiency or energy performance, such as:

- “as new” performance regarding image quality and functionality
- “as new” appearance, cosmetically
- “warranty length” the same as a new product

Thank you for providing us with this opportunity to provide comments. Please do not hesitate to reach out to me with any questions.

Best regards,



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