



April 24, 2018

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 Draft 1 Specification

Thank you for the opportunity to comment on the ENERGY STAR Imaging Equipment Version 3.0 Draft 1 Specification. As the global voice of the tech sector, ITI has been a long-standing partner throughout ENERGY STAR's development and we continue to support practical, data-driven updates to the product specifications. For these reasons, ITI is invested in ensuring that the EPA's Imaging Equipment Dataset and Analysis ("dataset") appropriately captures the reality of the imaging equipment market.

We also provide high level comments and concerns about other aspects of the Imaging Equipment Draft 1 Specification. We appreciate your consideration of our comments.

Dataset Analysis

ITI strongly supports the inclusion of v2.0 models and non-certified products into the EPA's dataset. We welcome the opportunity to provide supplemental industry data to strengthen the EPA's analysis, and look forward to working on this with the EPA.

Currently, the dataset excludes models that have the same print speed, TEC, and other data of existing models. It is possible for different models to have the same TEC value and each models should be counted separately (e.g. Canon D1520, D1550, MF419dw). Furthermore, the TEC value is rounded, so a TEC that is the "same" on the EPA's Qualified Products List (QPL) might not actually be the same, even though the final TEC reported is the same.

TEC Limits

We are still analyzing the TEC limits and expect the proposed limits to change after the dataset is updated as proposed.

Professional Products

The Professional Products definition proposed in Draft 1 (perhaps, inadvertently) includes some standard office products that are not "Professional" or "Production" equipment, such as the HP Color Laserjet Managed Flow MFP E87660z below (see Figure 1). In order to avoid inappropriately qualifying such products as "professional", we recommend adding the following criteria to the 'Required' criteria in the definition: Weight (base engine) > X 200 kg.



Additionally, we propose that all information related to testing of professional products is placed in one discrete section of the specification. This better allows accredited labs to limit the scope of their accreditation to exclude Professional Product testing if such products are not tested in that lab.



FIGURE 1

Alignment with Blue Angel

While we appreciate the EPA's intent to harmonize with Blue Angel, in many cases, the v3.0 Draft 1 specification deviates from Blue Angel and requires additional testing. We provide a few specific concerns:

- V3.0 calculation for Recovery Time using Active Time - The Blue Angel requirement is fulfilled by performing a special test. To implement that kind of testing for ENERGY STAR is unnecessarily burdensome and may not be EPA's intent.
- Print Speed - the print speed difference between letter and A4 is not considered in setting speed limits for certain criteria. In some cases, this makes the ENERGY STAR requirement more stringent than the BA requirement.

We recommend leaving the Recovery Time as it is in v2.0 Specification and only reporting Active Times, not calculating or limiting Recovery Time. As TEC limits get tighter, sleep power has to be lower to achieve it, which could lead to a slower printer response time out of sleep. That response time, however, will remain minimal because customers would not accept a significantly longer recovery time. The industry knows recovery time is important and will naturally continue to control it just as customers will continue to demand it. This additional requirement will not make the customer experience better, it will only make product testing and reporting more burdensome.



Taiwan Testing

Requiring a separate paper for Taiwan TEC creates another test and adds another paper to source (uncommon in the US). This requirement does not provide any additional information given the 115V/letter testing we already do for the US. **We urge the EPA to remove** the separate paper requirement for Taiwan.

TEC in kWh/year

In theory, reporting TEC as an annual energy consumption instead of a weekly energy consumption is not difficult, but in practice, the implications are far-reaching in terms of the automated calculations, documentation, and comparison back to historical references. ITI recommends keeping the TEC unit as kWh/wk to avoid customer confusion and added complication in a short timeframe.

Wifi Adder for TEC Products

Although the Draft 1 Specification moves wifi above USB in the test method I/O hierarchy, wi-fi does indeed use more power than USB. For example, Blue Angel allows for an extra 1W for Sleep with wi-fi. We recommend including a wi-fi adder for TEC products similar to the existing A3 adder for TEC products and the wi-fi sleep mode functional adder for OM products. We also plan to conducting more analysis and recommend an exact adder value soon.

Duplex Proposal

Low end (low speed) TEC products also have very low print volumes, which greatly limits the amount of energy to be saved with duplexing. It is unclear how EPA determined the proposed thresholds for auto-duplex. We request more information about the analysis/methodology used for determining the proposed thresholds in Draft 1.

Sincerely,

A handwritten signature in black ink, appearing to read "AMcBride", is positioned above the typed name.

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