

Comments on ENERGY STAR Imaging Equipment Test Method for Determining Professional Imaging Product Energy Use Final Draft, Rev. August-2019

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JBMIA Printer/MFD Technology WG

JEITA Printer Energy-saving WG

1) Line 30 Table 3

According to our (JBMIA/JEITA) survey results of the Input Power Requirements for each manufacturer’s Professional Products, we found that most of the products whose power consumption exceed 1500W use the 200V system power source. Therefore, we request following modification for the Table3.

And we attach the survey results of the Input Power Requirements (Professional Imaging Product Power Requirement vs TEC Test Voltage). This list shows the Professional Products that is assumed to be currently used in the market, and it includes the products that is already discontinued.

Table 3

Market	Voltage	Voltage Tolerance	Maximum Total Harmonic Distortion	Frequency	Frequency Tolerance
North America, Taiwan	115 V ac 208 V ac 230 V ac	+/- 4.0 %	5.0 %	60 Hz	+/- 1.0 %
Switzerland	230 V ac	+/- 4.0 %	5.0 %	60 Hz	+/- 1.0 %
Japan	100 V ac 200 V ac	+/- 4.0 %	5.0 %	50 Hz or 60 Hz	+/- 1.0 %

2) Line 55 H) Paper Specification 1)

Though it is described that all testing shall be conducted using uncoated paper on the Note for Line55, there is no description of “using uncoated paper” for 1) Standard Format Products.

The following modifications are required.

1) Standard Format Products shall be tested using uncoated paper in accordance with Table 4.

3) Line 98 K) Color

Though Color-capable products are premised on using color mode, according to current requirement, the Color-capable products whose default setting is monochrome mode are tested using monochrome mode.

Therefore, the following modifications are required.

K) Color: Color-capable products shall be tested in color mode regardless of the default (as-shipped) setting.

4) Line 172 3) As-shipped condition

If the paper setting of the product's default setting is different from the Paper Specification, it should be allowed to change the default setting and test under this condition.

The following addition is required.

e) If the paper setting of the product's default setting is different from the Paper Specification, conduct the test after changing its default setting to the Paper Specification.

5) Line 179 b)

There are products that cannot disable or extend unlimitedly a Default Delay Time to Sleep (Blue Angel does not allow to extend unlimitedly a Default Delay Time to Sleep). And if it does not interfere with the test, it should be allowed to test without disabling a Default Delay Time to Sleep.

Therefore, the following modification is required.

b) If the product has a Default Delay Time to Sleep, it shall be disabled prior to testing. However, the product that cannot disable a Default Delay Time to Sleep should be changed to the setting that does not interfere with testing.

6) Line 187 d)

If the default setting of the products is not BQ/BP mode defined in ISO21632, following requirements are necessary.

Following supplement should be added.

For the products whose as-shipped combination does not correspond to the BQ/BP mode defined in ISO 21632.

- Specify the mode (BQ or BP) during testing.
- Adopt the product speed used for testing as "Product Speed for Calculations and Reporting".

7) Line 201 6.1 Test Flow

Clear description for the composition of the Print Jobs of the Test should be added. Therefore, the following description should be added.

Each image in a print job shall be sent 16-page jobs multiple times (i.e., all image may be part of the same document), but shall not be specified in the document as multiple copies of 16-page jobs.

8) Line 211 Equation 2

Error correction

N_{COPIES} is not the number of images per job and is the number of copies per job.

The following modification is required.

N_{COPIES} is the number of copies per job;

9) Line 229 Figure 1

10) Line 231 Table 6

Since a Default Delay Time to Sleep is disabled in 5.1 General Initialization b), the UUT does not transition to the STEP 7 of Test Procedure. Therefore, STEP7 should be deleted from Figure 1 and Table 6.

11) Line 222 Paper

There are some professional products that cannot set sufficient paper under its as-shipped configuration. And we request the description that allows the paper supply during test. For example, it is assumed to supply paper during Ready between Jobs that does not significantly affect power consumption.

- 1) Paper: There shall be sufficient paper in the UUT to perform the specified print. However, if the products cannot set sufficient paper under its as-shipped configuration, it is allowed to supply paper during the Test. But it shall not significantly affect power consumption (For example, supplying paper during Ready between Jobs).

12) Other Comment Summary

There is a description “which will be in the form of a dot revision” at “Future Specification Revision” of Version 3.0 Professional Imaging Equipment Draft 2 Test Method Comment Summary. On the other hand, there is a description of “with the goal of developing requirements based on this test procedure in a Version 4.0 specification” at “6.1.3 i. Professional Imaging Products” of Eligibility Criteria Version 3.0. There is a contradiction. We request to clear which description has priority.

13) Other Data Collection

For data collection, we request that you make sufficient adjustments with Stakeholders. Professional Products are large compared to Office Products. And it will take more labor and cost more than Office Products. For example, we are concerned the following cases.

- More TEC test time (including preparation for the test)
- Arrangement of the product when the company does not own the equipment in-house (cost / time)

- Schedule adjustment with the test of currently developed products.

End