

Comment on ENERGY STAR Imaging Equipment Version 3.2 Draft Specification

dated on June.04,2021

Line	Item No	Comment/Question	Reason	N.B.
463	3.4 Requirements for Professional Imaging Products	<ul style="list-style-type: none"> • Requirements for DFE of Professional equipment are deleted at all from the criteria. Please tell us how to test DFE for Professional equipment. • If DFE has a different consent from that of the main body, will the Production Efficiency and READY power of the Professional Equipment be calculated including DFE power consumption? • How will be the separate DFE data (energy, power etc.) integrated into Energy efficiency and READY power of the main body(i.e. the product as a whole)? 	<ul style="list-style-type: none"> • The DFE test method is stipulated in the Professional Equipment test method for the purpose of measuring TEC DFE. There is no DFE test method description regarding Production Efficiency and Ready Power. • Also, there is a case of Professional Equipment, whose main body power source is AC200V and DFE power source is AC100V. 	

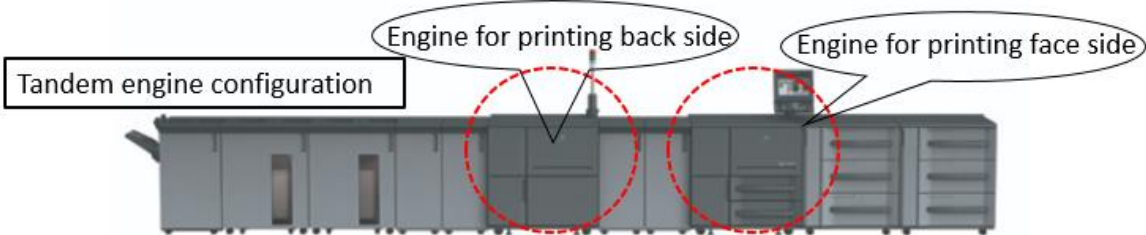
		<p style="text-align: right;">TYPE I DFE</p> <p style="text-align: right;">TYPE II DFE</p>	
		<p>7 TEST PROCEDURES FOR PRODUCTS WITH A DIGITAL FRONT END (DFE)</p> <p>This step applies only to products that have a DFE as defined in Section 1 of the ENERGY STAR Program Requirements for Imaging Equipment.</p> <p>7.1 Ready Mode DFE Test</p> <p>A) Products that are network-capable as-shipped shall be connected during testing. The network connection used shall be determined using Table 5.</p> <p>B) If the DFE has a separate main power cord, regardless of whether the cord and controller are internal or external to the imaging product, a 10-minute power measurement of the DFE alone shall be made, and the average power recorded while the main product is in Ready Mode.</p> <p>C) If the DFE does not have a separate main power cord, the tester shall measure the dc power required for the DFE when the unit as a whole is in Ready Mode. This will most commonly be accomplished by taking an instantaneous power measurement of each dc input into the DFE and adding them together for the total dc power.</p>	

		<p>7.2 Sleep Mode DFE Test</p> <p>This testing shall be performed to obtain the Sleep Mode power of a DFE device over a 1-hour period. The resulting value will be used to qualify Imaging Equipment products that incorporate DFEs with network-capable Sleep Modes.</p> <p>A) Products that are network-capable as-shipped shall be connected during testing. The network connection used shall be determined using Table 5.</p> <p>B) If the DFE has a separate main power cord, regardless of whether the cord and controller are internal or external to the imaging product, a 1-hour power measurement of the DFE alone shall be made, and the average power recorded while the main product is in Sleep Mode. At the end of the 1-hour power measurement, a print job shall be sent to the main product to ensure the DFE is responsive.</p> <p>C) If the DFE does not have a separate main power cord, the tester shall measure the dc power required for the DFE when the unit as a whole is in Sleep Mode. A 1-hour power measurement of the dc input to the DFE shall be made, and the average power recorded while the main product is in Sleep Mode. At the end of the 1-hour power measurement, a print job shall be sent to the main product to ensure the DFE is responsive.</p> <p>D) In cases B) and C), the following requirements apply:</p> <ol style="list-style-type: none"> 1) Manufacturers shall provide information on: <ol style="list-style-type: none"> a) Whether DFE Sleep Mode is enabled as-shipped; and b) The expected time to sleep of the DFE. 2) If the DFE does not respond to the print request at the end of 1 hour, the Ready Mode power level measured in the test method shall be reported as the Sleep Mode power. 		
488	3.4.1 Automatic Duplexing Capability:	<ul style="list-style-type: none"> • We agree with the proposal to continue requirements on automatic duplex function. 	<ul style="list-style-type: none"> • Duplex is used fairly often. We cannot show its frequency with specific figures, however, there are a number of duplex deliverables, such as catalogue, pamphlet, DM etc. • Duplex function is added to media transportation unit. During simplex printing, duplex-related transportation part does not work, therefore, it does not lower the value of Production Efficiency or increase that of Ready power. 	



495	3.4.2 Production Energy Requirements	In the calculation of Production Efficiency, “Transition Energy” (FPPT) of steps 3, 5 and 6 is not included. Please clarify this rule.	<ul style="list-style-type: none"> It is specified in the criteria to refer to STEP 3, 5 and 6 for power calculation. However, each step measures FPPT and Production energy. It seems necessary to make clear that only Production energy/pages is adopted for the calculation of Production Efficiency. 	
523	3.4.2 Production Energy Requirements:	Concerning Table 8: Production Efficiency Requirements for Professional Imaging Products, the criteria for Color should be that of Monochrome and vice versa.	It seems a typo.	
535	3.4.3 Ready Mode Power Requirement:	We request the EPA further to relax the requirement for Ready Mode Power.	<ul style="list-style-type: none"> Based on our comments on April 5, 2021, we have acknowledged that the EPA has modified the maximum ready power from 780W to 900W. However, the pass rate is still low for devices with 100 or more ppm. 	

			<ul style="list-style-type: none"> • Also, the fusing unit of this speed range needs a tremendous heat capacity to sustain product performance (image quality/media flexibility/productivity). The market needs to respond to a wide spectrum of media will be getting stronger in the future and it seems fairly difficult technically to reduce power consumption. Based on this situation, please reconsider the criteria. 	
163	<p>DEFINITIONS</p> <p>d) Professional Digital Front-end (DFE):</p>	<p>Although DFE requirements are deleted in the criteria of Professional Equipment, the definition of Professional Digital Front-end (DFE) is remaining in the definition part.</p> <p>Could the EPA tell us the reason why it is not deleted.</p>		

	Others	Please consider how to handle “tandem” products.	There are “tandem” products in Professional Products, which realize high speed duplex productivity using tandem engines. “Tandem” product has totally two fixing units, resulting high power consumption. Since it is a superior product, it is installed for government offices and so forth. However, its tender condition includes ENERGY STAR mark.	
		<p>Konica Minolta bizhub PRESS 2250P</p>  <p>Other than the above product, we found following “tandem” products as well. Xerox: Nuvera 288 EA Production System, Nuvera 314 EA Production System</p>		

	Relevant items	Correct figures.	It seems typographical errors. See the following pages.	
--	----------------	------------------	--	--

4.2.3 All units/configurations for which a Partner is seeking ENERGY STAR certification, must meet the ENERGY STAR requirements. For remanufactured products, the Partner must **748** assign the certified configurations an identifier in the model name/number that is unique to **749** ENERGY STAR certified configurations. This identifier must be used consistently in **750** association with the certified configurations in marketing/sales materials and on the **751** ENERGY STAR list of certified products (e.g. model A1234 for baseline configurations and **752** A1234-R for remanufactured ENERGY STAR certified configurations).|

P7 2.1.2項 Table 1

Equipment Type	Media Format	Marking Technology	ENERGY STAR Evaluation Method
Professional Imaging Products	All	All	Production Efficiency (Section 3.4.3) ⇒ 3.4.2 ? and Ready Mode Power (Section 3.4.4) ⇒ 3.4.3 ?

P15

523

Table 8: Production Efficiency Requirements for Professional Imaging Products

Applicable Professional Imaging Product Type	Maximum Allowable Production Energy (Watt-hour/Image)
Color	0.42 ⇒ 0.67
Monochrome	0.67 ⇒ 0.42

P17

- 630
- 631
- 632
- 633
- 634
- 635
- 636
- 637
- *Adder_{INTERFACE}* is the power allowance for the interface functional adders used during the test, including any fax capability, and as selected by the manufacturer from Table 0, in watts; ⇒ 16
 - *n* is the number of allowances claimed for interface functional adders used during the test, including any fax capability, and is less than or equal to 2;
 - *Adder_{OTHER}* is the power allowance for any non-interface functional adders in use during the test, as selected by the manufacturer from Table 0, in watts; and ⇒ 10

645 3.5.4 Off Mode Power Consumption Off Mode power, as measured in the test procedure, shall
 646 be less than or equal to the Maximum Off Mode power specified in **Table 81**, subject to the
 647 following conditions. ⇒11? ⇒11?

654 **Table 81: Maximum Off Mode Power Requirement**

Product Type	Maximum Off Mode Power (watts)
All OM Products	0.3

661 4.1.1 When testing Imaging Equipment products, the test methods identified in **Table 92** shall be
 662 used to determine certification for ENERGY STAR. ⇒12? ⇒12?

663 **Table 92: Test Methods for ENERGY STAR Certification**

Product Type	Test Method
All Imaging Products, excluding Professional Products	ENERGY STAR Imaging Equipment Test Method, Rev. Nov-2018
Professional Imaging Products	ENERGY STAR Professional Imaging Equipment Test Method

⇒ Dec2018

Request of a transitional measure regarding the application of Ver3.2

<Comment/Question>

- The revision V3.2 requires tests per Professional Equipment Test Method.
- We are afraid whether CB's are ready to test Professional Products, since Professional Equipment test is quite different from the conventional TEC test.
- There is a grave concern that a manufacturer cannot make application to register its Professional Equipment for a certain period after the established criteria of Professional Equipment is reflected in the revised Ver3.2, which is published as amendment of Ver3.1.
- We would like to ask the EPA to devise some countermeasure against any possible blank period for the application of ENERGY STAR Ver3.2.

- Our ideas follow for your reference:

Is it possible to write in the cover letter that the criteria of Professional Equipment have been established, however, the application to register Professional Equipment as ENERGY STAR product can be made first in six months after the publication of the cover letter? Or, during the six months after the publication of the cover letter, can the EPA accept the application of Professional Equipment via Ver3.1?

We appreciate greatly if the EPA comes up with any creative measure to solve the above issue.

<Reason>

JBMA has conducted a survey among member companies about how the certification of each test laboratory is acquired according to ENERGY STAR 3.2 revision.

Some companies, which own first-party laboratory with the accreditation by AB, have already acquired the certification to test Professional

Equipment.

However, it has turned out that quite a different situation seems to exist for companies, which test under SMTL program by CB. It has been reported from a CB that SMTL program will start only after the official publication of Ver 3.2, after which its Japanese subsidiary should be certified to test Professional Equipment to start its SMTL program. A certification for Professional Equipment under SMTL program by this CB should be able only in November, 2021 or later.

Therefore, manufacturers under SMTL program by CB cannot start testing Professional Equipment for almost half a year after the publishment of the amendment Ver3.2. In the meantime, such manufacturers cannot acquire ENERGY STAR registration by the EPA for their Professional Products and would hesitate to launch the products in question without ENERGY STAR mark, causing considerably bad influence on their business.

END