

Comments on Product Specification for Imaging Equipment Eligibility Criteria  
Draft 1, Version 3.0

April 10, 2018

JBMA Printer/MFD Technology WG

JEITA Printer Energy-saving WG

1. 1 DEFINITIONS 8) Professional Imaging Product c) & d)

In order to clarify the target of Professional Product, we request the following revision.

c) Monochrome product speed equal to or greater than 86 ipm

→Monochrome product: Monochrome print speed equal to or greater than 86 ipm.

d) Color product speed equal to or greater than 50 ipm (if product is color capable)

→Color product: Color print speed equal to or greater than 50 ipm

[Reason]

“Monochrome product speed” of c) can be read as applicable to Color product, which conflicts with the description d). <Current specification requires for color product not only color speed (50ipm or more) but also B/W speed (86ipm or more).>

2. 2.2 Excluded Products ii Professional Imaging Products

In Ver 3.0 “Professional Imaging Products” are described as excluded products. There is also a description line 243 “EPA is maintaining the current scope in Draft 1”. We request that the EPA clarify how “Professional Imaging Products” are handled during the period between Ver 3.0 effective date and the next Ver 3.1(?) effective date, which specifies the criteria for “Professional Imaging Products”.

[Reason]

We are confused by the current description.

What happens to the products, which satisfy the definition of “Professional Imaging Products” in Ver 3.0? Are these products unable to carry ENERGY STAR mark? Or, can these products carry ENERGY STAR mark as Printer or MFD (in conventional manner), if they satisfy V3.0 TEC Requirement?

3. 3.2.1 External Power Supply (EPS)

We request to maintain the current “level V requirement”.

[Reason]

The criteria of the US federal law for EPS “0 CFR Part 430” is applicable to consumer products. Additionally “level VI requirement” is effective currently only in the USA. Since ENERGY STAR is utilized in products sold world-wide, it is deemed inappropriate to apply “level VI requirement”..

#### 4. 3.3.1 Automatic Duplexing Capability

We oppose this revision proposal.

[Reason]

It does not harmonize with Blue Angel either. Also, the reason of lowering the limit speed bin is unclear.

As Webinar P40/P41 “Models with Automatic Duplex Capability” shows, in newly required Color speed bin 16-20(ipm) and B/W speed bin 11-25(ipm) about half products do not satisfy the requirement. This urges manufacturers to re-design, which leads to cost-up etc. Thus this requirement impacts manufacturers significantly.

Additionally there are low-speed products, for which customers do not need “Automatic Duplex Capability”. Such products constitute about 50% of the speed bins in question. If the new requirement kills these products, it would not be appropriate from the standpoint of customers’ convenience.

#### 5. 3.3.2 Typical Electricity Consumption

##### (1) A3 adder

We request to maintain the current A3 adder.

[Reason]

Regarding the power consumption during printing it is apparent that A3 model takes more power than A4 due to the device configuration. This difference should be taken into consideration in specifying  $TEC_{REQ}$  value. In the past discussion the EPA recognized this fact (See the following URL).

[https://www.energystar.gov/sites/default/files/specs//ENERGY%20STAR%20Final%20Draft%20Imaging%20Webinar\\_FINAL.pdf](https://www.energystar.gov/sites/default/files/specs//ENERGY%20STAR%20Final%20Draft%20Imaging%20Webinar_FINAL.pdf)

## (2) Equation 3, Equation 4, Equation 5

We oppose a big change in the equation. Particularly we are against the change of EJOB\_Daily (to 1/4) and NJOBS/4 (to NJOBS/16) in Equation 3 and Equation 4, which is the result of paper usage amount review.

Additionally, "Table 6" in Equation 5 looks like typo. It should be deleted.

[Reason]

Users won't be able to make any comparison with the past products in general documents such as brochure and the evolution of energy saving will be made unknown. LCA data of the same model will be altered. Thus, there is a strong concern that this change causes confusion in the market.

## (3) Table 6: TEC Requirement

We request that the proposed  $TEC_{REQ}$  be reconsidered, taking following reasons into consideration.

- a. According to the disclosed Dataset, it covers only products registered in 2015 and after. It should cover all current ENERGY STAT products including those registered before 2015,  
V2.0 revision adopted the Dataset including all products listed in Certified Products List without any filtering based on the registration year. V3.0 should take the same approach to determine the new criteria.
- b. Since the data of OEM products are duplicates of the base product data, the former should be collapsed to the latter data. (Do not adopt the data of OEM products into the Dataset.)
- c. Clarify the logic of drawing criteria lines.  
There are some speed bins, where CL level is lower than BW level or MFP level is lower than SFP level.

## 6. 3.3.4 Recovery Time

OM products should be out of the scope of Recovery time requirement.

[Reason]

Since the test method of "Active0 time", "Active1 time" and "Active2 time" is not established for OM products, it is not appropriate to apply the Recovery time criteria to them.

#### 7. 3.4.4 Off Mode Power Consumption

We request the limit value be 0.4W, harmonizing with Blue Angel.

[Reason]

This proposal (Maximum Off Mode Power 0.3W) is based on the revision draft of EU Lot6/Lot26. However, it is not yet fixed, i.e. EU committee has not yet certified the new criteria. Further, the actual effective date of the new criteria (0.3W) is proposed to be two years after the revised regulation becomes effective.

END