

**Comments on Product Specification for Imaging Equipment
Test Method for Determining Professional Imaging Product Energy Use
Draft2, Rev. Nov-2018**

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JBMIA Printer/MFD Technology WG
JEITA Printer Energy-saving WG

**2. Test Method for Determining Professional Imaging Product Energy Use
Draft2, Rev. Nov-2018**

1) 4.1 General Test Setup

1) As-shipped Condition

Line 66 2)

These contents should not be described in the "General Test Setup" and should be described in the "General Initialization". And following contents is already described in the "General Initialization" on Line 172.

"2) If the product has Auto-off capability and it is enabled as-shipped, it shall be disabled prior to testing.

And about this "Auto-off feature", there is a case that a product transitions to off mode when the product is not used for a certain period of time and when the specified time comes. Both cases may interfere with the testing. And this requirement is also common to Non-Professional Imaging Products.

Therefore, we think this description should be deleted.

And as "AS-shipped Condition", it is necessary to add following description instead of current description.

"2) Professional Imaging Products shall be tested in their "as-shipped" configuration unless otherwise specified by this test method."

2) 5.1 General Initialization

A) Prior to the start of testing, the UUT shall be initialized as follows:

Since the setting value of default delay time to sleep of UUT may interfere with the

testing, appropriate description should be added.

We propose to add the following description after Line 173.

"3) If the setting value of default delay time to sleep of UUT would interfere with the testing, the setting value should be changed or the feature shall be disabled."

Line 181

2) Connect the UUT to its power source.

Item number is overlapping. Correct as follows.

Line 181 2) → 4)

And because of this correction, Line182, Line187, Line 188 should be corrected as shown below.

Line 182 3) → 5)

Line 187 4) → 6)

Line 188 5) → 7)

3) 6.1 Test Flow

Line 209

Note: The stakeholder also recommended that print jobs for the Professional Imaging Products Test shall have each image sent separately, but shall not be specified in the document as multiple copies of a single original image. This appears to be representative of a single large print job with differing pages (like an illustrated book) rather than multiple copies of a shorter document (like pamphlets or flyers). EPA welcomes feedback on this proposal.

Since it takes time to investigate, we will send late comment concerning this issue

Line 232 Table 6

STEP2

Measurement action is missing. Correct the description as follows.

"Zero the meter, measure energy and record time to trailing edge of first page reaches exit point."

STEP5/STEP6

Typo shall be corrected (Step5/Step6).

“Production print 1 energy“ → ”Production print 2/Production print 3 energy”

STEP7

When measuring the Sleep mode, measurement time should be described and we think that over 5minutes measurement would be appropriate as the ISO21632. We propose to add following description in Action section.

“Zero the meter and timer. Measure energy over 5 minutes or more.
Record both energy and time.”

Line 243

Note: EPA welcomes feedback on this proposal, test results according to it, and recommendations on how to combine the results of the tests in future Professional Imaging Equipment eligibility criteria in Version 4.0.

If you have the plan concerning the following item, please let us know.

- The timing to fix the test method for Professional Imaging Products.
- How to collect the test data for developing the criteria.
- Duration of the data collection and the scheduled timing for developing the criteria.

End