

## METI's Comment on ENERGY STAR Product Specification Drafts

In test procedures included in the drafts released this time, we found that input power requirements for Japanese market was changed from a conventional expression as “50Hz/60Hz” to “50Hz and 60Hz”. It should remain as “50Hz/60Hz” to make the requirement adequate for Japanese market for the following reasons:

1. For products whose test conditions are written in the Energy Conservation Law in Japan, the input power frequency requirement is provided as “50Hz/60Hz”; moreover, the expression as “50Hz/60Hz” is rather appropriate when looking at the commonly-accepted usage;
2. There is no significant difference in power consumption measured with 50Hz and 60Hz; and,
3. Delay in product certification process will become a great concern, if LABs are required to test products with both frequencies, in consideration of the current situation where ensuring enough number of LABs and CBs is a big issue.

According to the actual condition in Japan, we heard that manufacturers choose one of the frequencies for test, with which measurements are expected to be larger, and then compare the test results to relevant ENERGY STAR criteria. Still “50Hz/60Hz” is the most preferable expression; however, if EPA hopes to clarify the test frequency, an annotated expression may be acceptable, such as “50Hz or 60Hz; the measurement shall be made using one of these frequencies, with which the test result is expected to be larger”.

After this comment period, EPA is going to release the finalized product specifications by the mid October, which means that LABs and CBs can start testing and certifying only after the date. On the other hand, in the EPA's schedule of program enhancement, the transition to the new system is planned to be completed by the end of this year (2010). Thus, we only have maximum 2 months by the time when the new system begins, that is insufficient to make enough number of qualified products available for consumers in January 2011. If the logo use for products qualified through a conventional process is banned from January 2011, it would bring serious confusion in markets around the world.

METI is repeatedly submitting a comment that a proper length of transition period should be set for a few years or so. We would like to strongly state the concern once again as well as to demand your answer to the issue.

October 1, 2010

Ministry of Economy, Trade and Industry