



Memo

Venlo, 12 September 2017

from Mathijs Hermens
Jos Beekwilder

to EPA – Mr. Ryan Fogle
ICF – Mr. Matt Malinowksi

Ref: 17-0244

subject

Feedback from Océ Technologies B.V. concerning ENERGY STAR® Imaging Equipment Draft 1 Test Method

1 Introduction

Océ wishes to express thanks to the EPA for the continuous efforts and initiatives for optimizing the use of scarce energy resources. Especially the role of ENERGY STAR as a de facto global standard with harmonized energy efficiency standards for Imaging Equipment is highly appreciated by our company. Below you will find some comments on the ENERGY STAR® Imaging Equipment Draft 1 Test Method.

2 Product Speed for Calculations and Reporting

EPA proposes to require testing print speed in accordance with international standards. According to the note in this section, it is assumed that manufacturers already employ these international standards and using these standards will promote consistency in manufacturing declarations.

- 1) As manufacturer declarations are not subject to objective verification, we think that adding this requirement will not be effective in promoting consistency in manufacturing declarations.
 - 2) Adding a reference to an external standard adds unnecessary complexity to reading and understanding this document. If such a standardized method of determining product speed is to be applied, the method should be described in this document.
- ➔ Because of this, we propose to revert back to the original text.

3 Wi-Fi connection Priority

(not relevant for Océ products).

4 Network Activity

As stated in our comments on the Version 3.0 Test Method Discussion Document, in our experience most network requests for our printers are related to setting up the conditions of the Imaging

Equipment to start operation (printing) in Océ's specific product environments (high productive) and with our products that use a DFE for network communication. Network requests to our printers are explicitly intended to perform the transition from Sleep State to Ready State (in order to enable start printing).

Fact is that our customers do not report that Océ systems leave Sleep state or consume higher levels of energy due to any network activity that is not intended to the imaging equipment.

- ➔ Therefore, we do not see any added value to introduce a new test method trying to emulate network activity, in any case for Imaging Equipment equipped with a DFE such as all of Océ's ENERGY STAR certified products. Increasing the complexity of the test method, will result in additional investments in equipment and test efforts with no additional value in terms of distinguishing systems based on their energy consumption.

5 Paper Usage assumption

Please see below excerpt of Océ's comments on the Version 3.0 Test Method Discussion Document.

	Question	Océ Technologies Response
8	EPA seeks feedback on the validity of this stakeholder's claim and how this usage assumption should be calculated. Data to support claims of other usage assumptions are encouraged.	<p>According with Ref The future of Global Printing to 2020 Dr. Sean Smith & Giyah Mikhael Figure 2.2 there is a decrease of paper usage in the Publication market (30→25 Trillion A4); however paper usage in Commercial printing market remains stable, while paper usage for labeling and packaging increases.</p> <p>Table 2.13 shows for the same period an increase in colorant market: 8.7%, Main contributors are colorants for inkjet and electrophotography.</p> <p>Looking at the regional differences in print market (Table 2.7), the trend is a decrease in paper usage in USA and West Europe, and an increase in the other regions, especially in Asia.</p> <p>In other words, it will be a challenge to reshape the TEC formula trying to emulate a realistic general equation. We see that, among others, print technology and regional applications play an important role. We wonder if this change will deliver a better comparison way, aiming for further optimization of energy consumption.</p>

Furthermore, we do not agree that the new approach will provide the same end-result as stated in the cover letter. From our analysis we conclude that the revised values in table 11 may result in higher standby periods, leading to a higher outcome of the TEC measurement. Because of this, some current products may not comply with the new requirement, leading to additional costs to ensure continued compliance.

→ Because of the above, we propose to revert to the original table.

6 Concluding remarks

Océ remains at the disposition of EPA to further clarify the content of this feedback letter.

Mathijs Hermens

Jos Beekwilder