A CANON COMPANY

Memo

Venlo, December 13, 2018

from
Jos Beekwilder

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

subject
Océ Comments Energy Star Product Specification for Imaging Equipment Final, Version3.0 and related draft test methods | 18-0251

Dear Sirs,

Océ has taken notice of the further draft documents containing product specifications and test methods for Imaging Equipment under the ENERGY STAR® program. Océ welcomes the opportunity to provide comments on the ENERGY STAR Product Specification for Imaging Equipment Final Draft, Version 3.0 and related test methods. Below you will find our feedback and suggestions.

1 Eligibility criteria

Page 7: Professional Imaging Products
Lines 251-264: Océ welcomes the inclusion of Professional Imaging Products in the scope of the version 3.0 eligibility criteria. This will provide necessary continuity for the related market segments as well as a solid opportunity for the EPA to collect specific data on this class of Imaging Products.

Page 8: Excluded products.
Line 272: ”i. Products that are designed to operate directly on three-phase power.”

- ➔ Considering the fact that this applies also for Professional Imaging Equipment, this constraint will represent a missed chance if these products are excluded from certification. Take note that many three-phase powered imaging products would fulfill the definition of Professional Imaging Products and the market for such products has an interest in a well-established energy efficiency mark such as ENERGY STAR.
- ➔ We suggest to make the difference between professional and non-professional products, based on the power outlet requirements.

Page 12: Requirements for TEC.
Line 422: Reduction of volume with a factor 4 still in formula.

- ➔ Job volume reduction - A copy/print volume reduction of a factor 4 is not realistic for high-speed imaging products.
  Printers with high printing speed are intended for high volume printing (even when not fulfilling the definition of professional imaging products), and although the ratio speed-volume has changed over the years, it hasn’t reduced by a factor of 4, a factor of 2 seems more reasonable.

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Page 14: Recovery time.

Line 506: “iii For models with a Default Delay Time to Sleep greater than any found in Table 7, tR_MAX shall not be subject to a Recovery Time requirement.”
Condition iii cannot be met if maximum limits of table 3 are applied.
Consider specially the case of s>50: maximum default delay time to Sleep is 45 minutes; it is not possible to select a greater delay time, so that equation 9 is applicable.

- ➔ Constraints of equations 8 and 9 are not feasible for high productive imaging equipment (even when not fulfilling the definitions of Professional Imaging Products). Printers with high speed are intended for high volume printing and will go far less often in energy saving mode than slower printers. Therefor higher recovery times are fully acceptable for a user (not annoying) compared to low end printers. It is also very understandable that higher speed printers require a longer recovery time than lower speed printers and it would be no more than fair if it is not limited to 60 seconds but keeps scaling with the print speed of the printer

Line 518: Column 3 of table 4 not clear.

Example

>10-15 should be read as 10< t < 15?

2 Comments regarding Test Methods

2.1 Test method for determining Imaging Equipment Energy Use, Final Draft

Line 89: Table 4 - It is suggested to define only two ranges of paper sizes and weights, to relieve the burden of testing four different paper types.

Market	Paper size	Basis weight (g/m2)	Weight single sheet (g)
North America	8.5”x11”	75	4.52
Taiwan	A4 8.5”x11”	70 75	4.37 4.52
Switzerland	A4	80	4.99
Japan	A4	64	3.99

Group 1: 4.52 to 4.99 gram, difference is .47 grams, approx. 10% of the nominal paper weight.
Group 2: 3.99 to 4.37 grams, difference is .438 grams, approx. 10% of the nominal paper weight.
Due to tolerance in paper thickness and moisture absorption in the paper, the actual weight of a single sheet of paper having the minimal weight classification in one of the two groups above, can be higher than the actual weight of a single sheets of paper having the maximum weight classification in that group. There will not be a significant difference in energy use between papers types in a group.

Proposed table:
Testing with one of the paper types in each group suffices.

Market	Paper size	Basis weight (g/m2)	Weight single sheet (g)
North America, Taiwan,	8.5”x11”	75	Group 1: 4.52 to 4.99
Switzerland	A4	80	
Taiwan Japan	A4 A4	70 64	Group 2: 3.99 to 4.37

2.2 Test method for determining Professional Imaging Equipment Energy Use, Draft 2

Line 57: Table 4
It is suggested to define only two ranges of paper sizes and weights, to relieve the burden of testing four different paper types. Same arguments as used in section 2.1 above.

Market	Paper size	Basis weight (g/m2)	Weight single sheet (g)
North America	8.5”x11”	120	7.24
Taiwan	A4 8.5”x11”	120 120	7.48 7.24
Switzerland	A4	120	7.48
Japan	A4	127.9	7.98

Group 1: 7.24 to 7.48 gram, difference is .47 grams, approx. 3% of the nominal paper weight.
Group 2: 7.98 grams
Due to tolerance in paper thickness and moisture absorption in the paper, the actual weight of a single sheet of paper having the minimal weight classification in group 1 above, can be higher than the actual weight of a single sheets of paper having the maximum weight classification in group 1. There will not be a significant difference in energy use between papers types in group 1.

Proposed table:

Testing with one of the paper types each group suffices.

Market	Paper size	Basis weight (g/m2)	Weight single sheet (g)
North America, Taiwan	8.5”x11”	120	Group 1: 4.52 to 4.99
Switzerland	A4	120	
Japan	A4	127.9	Group 2: 3.99 to 4.37

Should the EPA have questions about our comments, we remain at your disposition for further clarification.

Kind regards,

Jos Beekwilder,
Director, Product Safety and Environment.