



A CANON COMPANY

Memo

Venlo, August 13, 2019

from
Jos Beekwilder

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

subject

Océ Comments Energy Star Test Method for Determining Professional Imaging Product Energy Use Final Draft, Rev. Augustus-2019 | 19-0132

Dear Sirs,

Océ has taken notice of the final draft documents containing test methods for Determining Professional Imaging Product Energy Use under the ENERGY STAR® program. Océ welcomes the opportunity to provide comments. Below you will find our feedback and suggestions.

Page 3: Product Speed for Calculations and Reporting

Lines 64-66:

“The product speeds for all calculations and reporting shall be the highest speed as claimed by the manufacturer.”

This text seems to be in conflict with the text on Page 7, Lines 187-188:

“Professional Imaging products shall be tested under the default as-shipped combination of productivity and quality.”

It would be more consistent if the speed for calculations and reporting is equal to the speed for testing.

Page 3: For standard size products, the product speed shall be based on:

Lines 72-73:

“The highest monochrome print speed, unless the product cannot print, ...”

This text seems to be in conflict with the text on Page 6, Line 98:

“Color: Color-capable products shall be tested under the default (as shipped) setting.

It would be more consistent if the speed for calculations and reporting is equal to the speed for testing.

Page 4: product speed for calculations versus product speed for testing:

Lines 96-97:

“The product speed used for all calculations and qualification, as calculated above, may not be the same as the product speed used for testing.”

Using different product speeds for calculations and for testing causes inconsistency and confusion. Océ proposes that the same product speed is used for calculations, qualification and testing.

Page 6: Service/maintenance Modes.

Lines 132-137: “Service/maintenance modes, including color calibration, shall be in their default state during testing.

We do not understand why the service mode needs to be in the default state, considering the fact that the test is done in normal operating conditions. Refer to the present valid test method for Imaging Equipment, chapter 5.1.E: “Service/Maintenance modes shall be disabled prior to testing”.

Page 6: General Initialization, for products designed to operate on battery power.

Lines 158-169:

In our opinion if the battery is being discharged during the test cycle, recharging the battery should be included in the measuring. While it makes sense (for repeatability of the test) to fully charge the battery prior to testing), it does not make sense to remove the battery before testing (if the product is capable to work without battery). It is proposed to require that the battery (batteries) remain in the product while testing, and ensure that prior to testing the battery (batteries) is (are) fully charged.

Page 8: Equation 2.

Lines 207-218.

Explanation and definitions are not clear.

Our interpretation is that N_{COPIES} is the number of jobs of 16 pages +1 single page, which are printed in time M (>5 min). The explanation offered in the draft (line 211) says different, so we are confused.

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.