



Memo

Venlo, 21 March 2017

from José Manrique
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to EPA – Mr. Ryan Fogle
ICF – Mr. Matt Malinowksi

subject

Feedback from Océ Technologies B.V. concerning ENERGY STAR® Imaging Equipment Version 3.0 Test Method Discussion Document

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 as well as answers to the questions asked in the Discussion Document.

2 Network Activity

Océ agrees that method A seems a realistic method.

However, 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). These requests 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 get awake due to aspecific network activity, meaning that any network activity that is not intended to the imaging equipment does not result in the system to leave Sleep state.

- ➔ 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 (see also question 4) such as all of our 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.

	Question	Océ Technologies Response
1	What is the easiest, most effective way to generate representative Simple Network	Open source programs snmpwalk and snmpget are now also available for the Windows

	Question	Océ Technologies Response
	Management Protocol (SNMP) requests?	platform. Of course commercial programs try to fill this gap.
2	Does an increase in the number of devices on the network result in more “wake ups”? If so, by what specific mechanism(s)? EPA requests data in support of any responses to this question	The more print requests (increasing number of devices communicating with the Imaging Device), the more significant the impact will be.
3	What computer or network behaviors negatively impact the imaging equipment’s ability to remain asleep?	The ability to remain asleep is influenced by network packets directed to an open port of the system. The amount of open ports should therefore be limited.
4	Will there be any adverse impact on measurements for products with digital front ends (DFEs) if one of the proposed test method revision options is adopted?	Systems with a DFE will generally not be impacted by any of the proposed test methods, because the DFE will in most cases take care to respond to requests, delivering information that is locally cached and without awakening the Imaging Equipment.
5	What specific user actions should be prescribed in option A to ensure that product behavior is tested against SNMP and other relevant data packet types?	N/A – see answer to question 4.
6	If option B is chosen, how can testers ensure that the required types of data packets are transmitted? Can this process be done without special software?	Commercial tools are able to detect specific data packages.
7	What proportion of the market can we expect to be impacted by the proposed test method revision options?	We believe that mainly the products that are not equipped with a DFE will be impacted.

3 Paper Usage assumption.

	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.	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.

Question	Océ Technologies Response
(Q8 continued)	<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>
9 EPA seeks any data on the relationship between product speed and paper usage.	-
10 If enough data is provided to support updating the usage assumptions, EPA is considering updating Equation 5 to account for this change. Are there other approaches that EPA can consider to incorporate updating usage assumptions into the specification?	-

4 Other Items for Consideration.

4.1 Maintenance modes.

Question	Océ Technologies Response
11 EPA requests feedback from stakeholders on the prevalence of this issue and encourages any available data on the frequency, duration, and power consumption of typical maintenance modes.	Maintenance modes are very sporadic in our applications. Cleaning procedures take place max. 1 time per TEC measurement. A typical cleaning operation takes about a minute.

4.2 Standby Power Definition.

	Question	Océ Technologies Response
12	Do stakeholders believe that this change would add clarity to the ENERGY STAR specification.	Océ believes that changing the definition has no added value. Such change would undermine the position of ENERGY STAR as an internationally recognized energy efficiency standard.
13	To what extent, does making this change impact international harmonization?	

4.3 Professional Products.

	Question	Océ Technologies Response
14	Does the proposal effectively differentiate professional product from commercial products for the purposes of the ENERGY STAR scope?	We do not understand the concern of applicability of professional equipment. ENERGY STAR scope must be aligned with market demands for ENERGY STAR products. This must be underpinned first before we can discuss.
15	What data are stakeholders able to share related to the duty cycle of professional products?	-
16	Are there any other initiatives that EPA should consider that would allow ENERGY STAR to continue including these products within the scope of the program?	As the ENERGY STAR program is very strongly supported by federal and state level government institutions in the USA, it would make sense to investigate to what extent such institutions are procuring professional imaging equipment – a strong presence of professional products with these institutions would support the continuation of the ENERGY STAR program for such products.

4.4 WIFI Connection Priority

(not relevant for Océ products).

4.5 Scope and additional Considerations

	Question	Océ Technologies Response
20	EPA is aware of products on the market today that no longer utilize a cartridge, but rather refillable ink tanks, which are believed to reduce waste and be more sustainable. EPA is interested in learning more about these products as well as potential ways that EPA could encourage or highlight the adoption of these products.	Cartridges/tanks/bottles should be recyclable. Whether it is a cartridge/bottle or tank makes no difference and should be up to the manufacturer. Refilling of ink tanks is not per se more sustainable than material recycling (think of cleaning, transport impact, etc.)
21	Are there other best practices that ENERGY STAR could encourage or adopt within the imaging specification, such as alerts for users and/or limiting the maximum machine delay time for TEC products?	For high-end products, there are warnings to the operator to realize maximum/optimum performance, e.g. alerting about toner levels and paper stock, wrong paper size/type for a specific job, so that the printers are not idle unnecessarily. There is no need for extra requirements, since products having these features will be more competitive for customers even without ENERGY STAR requirements. Océ does not see the added value of diluting the importance of energy efficiency in the ENERGY STAR criteria.

5 Concluding remarks

Océ remains at the disposition of EPA to further clarify the content of this feedback letter. Océ has no objections to posting the letter on the ENERGY STAR criteria development website maintained by the EPA.

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