From: Jim.Barndt@okidata.com
To: ENERGYSTARVerificationProgram@energystar.gov;
cc: Robert.Alleger@okidata.com; Michael.Golden@okidata.com;
Subject: Imaging Equipment Eligibility Criteria Draft Version 1.2 Partner Comment
Date: Wednesday, September 29, 2010 2:28:46 PM

Hello,

Oki Data Americas, Inc. would like to provide the following comments to ENERGY STAR Program Requirements Product Specification for Imaging Equipment, Eligibility Criteria, Draft Version 1.2. These comments were composed in conjunction with our parent company Oki Data Corp., Japan. Thank you for your consideration of the comments presented.

* Criteria, Page. 6: 3.1.1

--> The requirement of rounding off should clearly specify that a TEC value is rounded off to how many decimal places. A TEC value is generally several thousand W. The number after a decimal point is meaningless for a value in Wh. A value in kWh should be rounded off to two or three decimal places. It should be clarified the requirement is intended for a value in which of Wh or kWh. As described in 3.1.2, Failing products might be acceptable if a value in kWh is rounded off to the nearest whole number. The requirement of rounding off should be described carefully and clearly.

* Criteria, Page.10: Table 5 Maximum TEC Requirement

--> Completely different from a table of TEC datum values in Ver1.1. It is obviously incorrect. We would like you to precisely use the Ver1.1 table to describe the required values.

* Criteria, Page. 15: 4.2.2

--> Additional measurement of a TEC device is no longer described. Does another unit still have to be measured if the value is within less than 10% margin from TEC datum values, as previously required? Or is the additional measurement no longer required? An OM device had to take additional measurement with two units if the value is within less than 15% margin. Was the requirement changed into one with less than 10% margin?

* Test Method Page. 2: #4 D) Ambient Temperature

--> A correct description is 23°C± 5°C instead of 18°C - 28°C. The median value stays at 23°C. We consider the description to be incorrect.

Sincerly,

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