

RICOH's Comment on ENERGY STAR Version 3.0 Test Draft 1 Sep 2017

| Section | Draft1 | RICOH's Comment | Reason(s) |
|-----------------|---|--|--|
| Network testing | <p>2 packet types (out of 27) were chosen to make the TEC test closer to real-life conditions.</p> <p>Addition to TEC test, to be placed after Step 10.</p> | <p>We oppose to the implementation of this particular test method.</p> | <ul style="list-style-type: none"> • We would like to oppose to the “Obj 1 (Increase representativeness of the test method)”. We support EPA’s intent to investigate Network’s potential impact on electricity consumption, but we oppose to come up with a unique measurement role for certain category within imaging equipment. We recommend EPA to lead this effort to define an electricity measurement method relevant/applicable to all network appliances/products. <p>There are some discrepancies in types of packet as well as combination, frequency of such packet which is different from actual usage. If this measurement method (which we believe is incomplete) is incorporated into Ver. 3.0 specification, this could mislead the direction of technology development. As a result, we are concerned that such will not result in expected energy saving outcome. This measurement method should be developed with a consideration for future network technology improvement direction, and we should take more time to develop one.</p> <p>In order to define best/most complete measurement method, RICOH is willing to work/collaborate with other stakeholders</p> <ul style="list-style-type: none"> • We would like to oppose this based on EPA’s “Obj 2 (Minimize burden)”. This test method would require all products in the market place to be “re-tested”, and this would significantly increase manufacturers’ burden. |