

Comments on ENERGY STAR Imaging Equipment V3.0 Specification Draft 2

Manufacturer	Line number	Items	Comment	Proposition
Ricoh	239	2.2 Excluded Products	<p>In "Draft 1_ Version 3.0 Imaging Equipment Specification and Draft 2 Test Method Comment Matrix", EPA confirms that Professional Imaging Products remain in scope of the Version 3.0 specification as following: <i>They will be tested as TEC products and compared to the other TEC product types when setting requirements, as they were in V2.0.</i></p> <p>However, Professional Imaging Products are excluded from the scope (section 2.2 Excluded Products), which is in conflict with the above comment matrix.</p>	Delete L 239 (ii. Professional Imaging Products)
Ricoh	239	2.2 Excluded Products	<p>In the situation where the test method of Professional Imaging Products will soon be decided for the revision V3.1, it is expected that the test method and specification for these products will be forced to change in a short period of time. It means that some Professional Imaging Products are more likely to change status of registered (in V2.0), unregistered (in V3.0) and re-registered (in V3.1).</p> <p>Ricoh believes that this situation not only burdens the industry, but it also leads to unnecessary confusion at the procurement side, which will result in loss of ENERGY STAR brand value.</p>	<p>Request transitional measures to Professional Imaging Products until V 3.1 is enforced.</p> <p>For example, parallel with TEC products and OM products, establish new requirements for Professional Imaging Products in V3.0 with the request contents exactly the same as V 2.0.</p>
Ricoh	374	3.3.2 Typical Energy Consumption	<p>In certain product segment, the conformance rate is less than 25%. It should be corrected to a level securing 25% or more in line with description of the cover letter <i>"The amended ENERGY STAR requirements differentiate the top quartile of the market overall and for each individual product segment, including for those speeds where most product is sold."</i></p>	<p>In the "conformance rate for each product speed" shown in Annex sheet, There are several segments whose Certification rate is less than 25%. (specifically, 1-20 ipm BW MFP, 61-80 ipm BW MFP, 136 ipm or more BW printer, and overall A4 color MFP)</p> <p>These segment's conformance rate should be adjusted to 25% or more. (This table is created based on the table shown in the dataset presented from EPA)</p>
Ricoh	496-505	3.3.4 Recovery Time	<p>By improving usability of the imaging products due to the short recovery time, the delay time to sleep mode is shortened by the customer, and it leads to energy conservation in use stage. It is closely related to recovery time and energy conservation, and Ricoh think recovery time is a potential specification that is necessary for further promotion of energy conservation at customer's point.</p>	Ricoh request to change the order of request in the future revision to coincide with the energy conservation logic. (it is not a request to change the current recovery time requirement)