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Xerox Corporation
800 Phillips Road 105-66C
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Mr. Ryan Fogle
EPA Manager, ENERGY STAR for IT and Data Center Products

Dear Mr. Fogle:

Thank you for the opportunity to comment on the ENERGY STAR® Imaging Equipment Version 3.0 Final Draft Specification.

ENERGY STAR® Program Requirements for Imaging Equipment - Comments

Partner Commitments – are any changes being made to partner commitments (e.g. RoHS requirements, labeling and use of logo outside of the United States)?

Further clarification is required for products marketed internationally given expiration of the EU and EFTA ENERGY STAR® agreements. If a product has a 110V version sold in the United States and a 220V version sold in Europe, can the 220V model carry the ENERGY STAR® logo assuming it was tested and meets requirements? Many Xerox products have common packaging and software and unique labeling requirements will add cost.

Final Draft Test Method for Determining Imaging Equipment Energy Use - Comments

5.1.B.2)d) Under what conditions is the following statement allowed? Is it only applicable to products with common 110/220V configurations?

“When a manufacturer intends to qualify a product in a certain market by making use of test results that qualified the product in another market using other sizes of paper (e.g., A4 versus 8.5” × 11”), and if its maximum claimed speeds differ when producing images on different sizes of paper, the highest speed shall be used.”

The statement above seems in conflict with Section 4.3.1 in the Imaging Equipment specification that states “Products shall be tested for certification at the relevant input voltage/frequency combination for each market in which they will be sold and promoted as ENERGY STAR®.”

Draft 2 Version 3.0 Test Method for Professional Imaging Products - Comments

4.1. H.1 Paper specifications – request clarification if 120 gsm paper is coated or uncoated for testing with professional products. We assume uncoated but would like clarification.

4.1. I.1 The latest draft states, "Professional products should be tested in Best Quality and Best Productivity (BQ/BP) combination". Does this mean that they are tested twice (once for Best Quality and once for Best Productivity) as Best Productivity and Best Quality modes usually differ in speed significantly?

4.1. I.1 This criteria states the "As Shipped" condition (4.1.I.1 & 4.1.K) which may not be either Best Quality or Best Productivity. Most equipment is typically set to Best Productivity by default. Is this acceptable?

4.1. I) Some professional Imaging equipment cannot fully function in the base "as shipped" condition due to the plethora of finishing accessories (No finishing may be included, however the customer must choose at least one finishing device at time of sale). We believe that the UUT should be tested in the minimal configuration available to operate the machine for testing purposes. However, we believe that the finishing device power (if powered separately from the base printer/MFD) should not be included in the equations.

6.1.A) Images per Job: Professional imaging products are likely to print for much longer periods of time than 5 minutes. Many Professional Imaging Products ensure Image Quality by performing calibrations prior to starting job. This may give a false indication of power consumption as these may be performed for each of the three runs but would likely be performed much less on longer jobs performed by professional Imaging Equipment.

6.1. A) Images per Job: If we understand the "Note" section, for a hypothetical 120 ipm Professional Imaging Product, the EPA is expecting that the files size sent from the DFE is 120 ipm x 5 minutes or a file size of 600 images. Although this is a possible job size, it is atypical. It is more likely in this market that the job size will be smaller with multiple copies. We suggest a file of 10-20 images sent multiple times to meet the 5 minute run time.

Final Draft Version 3.0 Imaging Equipment Specification - Comments

1. A.8 Definitions/Product Types/Professional Imaging Products

- a. In previous versions the 180Kg limit was defined for only the base (Printer/MFD) unit. Latest version does not define if accessories are included or not in the 180Kg assumption. Please clarify if accessories are included in the overall weight of the product?
- b. If a criteria cannot be applied (as 3rd party Color certification cannot be applied to monochrome products), does this mean that only 4 of the 6 remaining criteria need to be met or does this reduce the ability of monochrome product to meet professional imaging equipment status (now requires 5 of possible 6 applicable criteria)?
- c. How is 1GB memory defined? Is this processor memory, hard drive memory, image storage memory?

- d. Suggestion – Add another category/criteria for professional products:
 - i. The ability to print on sheets 12x18"/SRA3 or larger. An alternative would be extra-long Sheets >19" (483mm).
 - 1. If allowed, The A3 adder in 3.4.3 Equation 15 should be increased for professional products that can print on sheets 12x18"/SRA3 or larger (alternatively >19" (483mm)) for the same reason as the A3 adder (requires more power over longer period due to paper size).

3.3.2 – Equation 6: Maximum TEC Requirement Calculation

In the note at the bottom of this section it states, "As Wi-Fi functionality may not be turned off by default, either due to easier usability or function as an access point, EPA proposes to extend the previously proposed Wi-Fi allowance to all models with the functionality enabled during the test even if they also support and are connected via Ethernet." We have several devices whereby the user has the choice to connect either wired or wireless. Once the user chooses Wired then the WiFi (Wireless) option is no longer active but there is still power to the Wi-Fi Circuitry. Is it acceptable to claim the 0.1 kWh/wk adder for Wi-Fi? Does the product have to be shipped with Wi-Fi enabled in order to claim the adder?

3.4.2. i) Automatic duplexing Capability

There is a typo in last sentence – "exempt from 3.4.1" should read "exempt from 3.4.2".

Sincerely,

Wendi A. Latko