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Ann Bailey
Chief, ENERGY STAR Labeling Branch
US Environmental Protection Agency

Submitted via www at: ENERGYSTARVerificationProgram@energystar.gov

Re: Comments on Proposed Revisions to the ENERGY STAR Partner Commitments
(Office Equipment; Imaging Standards)

Dear Ms. Bailey,

As a longtime stakeholder and participant in the ENERGY STAR program, we are happy to share with you our views and comments in regards to the recently issued Proposed Revisions to the ENERGY STAR Partner Commitments (Office Equipment; Imaging Standards).

I. Program Requirements

Page 2 - Providing Information to the EPA. (8.2)

Version 1.1 had this requirement as an "encouraged to provide" - Version 1.2 changes it to a "must" requirement. The requirement states that the segmentation would be prescribed by EPA. We would need to know what EPA expects on the segmentation requirement. Done improvidently, it could increase the burden on manufactures to provide information in a prescribed approach. It would be useful to know what EPA will be seeking.

Page 2 -Training and Consumer Education (11.1). This appears to be a completely new requirement.

In version 1.1, there was no requirement to include the educational language about the ENERGY STAR program in the user guides or in a printed box insert. Version 1.2 requires the following information in the user manual or as part of a printed box insert: (1) energy and cost savings potential; (2) environmental benefits; and (3) the ENERGY STAR logo, PLUS information on ENERGY STAR and a link to www.energystar.gov. This addition to version 1.2 is a significant change from version 1.1. Further, since the EPA requires that all units meet the requirements in place at time of the date of manufacture, it imposes an even larger burden on manufacturers with no energy savings. Existing User Guides that are being developed for upcoming launching products will need to be modified and this will result in cost and scrap of completed User Guides to accommodate the new requirement on products that launch and are manufactured after the effective date of this requirement. If the requirement

must be implemented, then a grace period should be allowed or grandfathering should be considered.

Page 2 - Training and Consumer Education (11.2). This appears to be a completely new requirement.

This is a new requirement to the program that we anticipate will cause manufacturers additional burden to include the link to web pages, product specifications and related content pages. EPA should not add new requirements to version 1.2 that significantly affect the specific program requirements and product qualification. If this requirement is kept, there must be a grace period to allow for manufacturers to make the changes or grandfathering should be considered as manufactures would like to avoid scrapping product specs that do not have this information added by the effective date.

II. Eligibility Criteria Draft Version 1.2

Page 1 - Definitions. Definition of product speed was omitted in version 1.2

Version 1.1 definition clarified that if A4 and letter speeds were different, then the faster would apply. Since version 1.2 does not include the definition with this clarification, it appears that if a product has a differing A4 and letter speed the product will have two different limits and job sizes for the 115v and 230v units. We would propose keeping the prior v1.1 language to use the faster of the 2 speeds.

Page 7 - Product Literature (3.2.3)

Printed and electronic product literature shall contain an explanation of default Delay Time to Sleep and its impact on product energy performance

This is an expansion of the version 1.1 requirement because it includes the express requirement to include "its impact on product energy performance". Having to add this information would require product literature changes and could result in scrap of guides that do not meet the requirement. If the requirement is kept, then there must be a grace period to avoid scrap.

Page 10 -Maximum TEC Requirement (Table 5).

All categories are missing certain speed bands and the respective limits from the table - EXCEPT for mono and color MFPs.

Page 16 - Effective Date.

States that the effective date of Version 1.2 is the date in Table 12 (July 1, 2009). The effective date of version 1.2 cannot be retroactive nor effective immediately upon publishing as there are significant changes in the draft version 1.2 which will require manufacturers to make changes to any v1.1 qualified unit manufactured after the date v1.2 takes effect. If EPA retains the substantive changes in the draft, then a feasible grace period or grandfathering

should be employed - e.g. EPA has employed a 9 month grace period in the past for prior spec changes to allow for manufactures to cut-in changes; or v1.2 modified changes should only apply to products that are newly launched from X date (9-month grace period from when v1.2 issued).

III. Imaging Equipment Test Method

Page 2 - Section 4 TEST SETUP F.1 Crest Factor

It appears that the ENERGY STAR program is moving from an accuracy calculation to an uncertainty calculation. With this new requirement, will ENERGY STAR be abandoning the accuracy calculation associated with the TEC worksheet? We would suggest that the accuracy worksheet be omitted if F.1 requirement is kept. If the accuracy worksheet is omitted, then we would support this change.

Page 4 - Section 6 - Product Speed for Calculations and Reporting (B).

In Version 1.1, if the A4 and letter speeds were different, then the spec expressly allowed the use of the faster of the two speeds for the job size and limit calculations. In Version 1.2, it appears that using the faster of the two speeds is not allowed, i.e. if the product has differing A4 and letter speed, then you have to use two different speeds to determine the job size and limits and run two different tests. We recommend allowing manufactures to continue to use the faster of the two speeds.

Page 8 - Note & Table 6

"EPA recognizes that it may be unclear to independent testers which Sleep Mode is the final one and is therefore proposing to include a time limit of 4 hours." Xerox has always advocated that ENERGY STAR should not be driving technologies. Accordingly, manufactures should decide what default time would be appropriate to use. Testers have alternative means of obtaining default time information.

We hope that you find these comments helpful and constructive in assisting the EPA and DOE to achieve its goals for the ENERGY STAR program.

Sincerely,



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