

Comments on Draft 1 Version 2.0 ENERGY STAR Imaging Equipment Specification

JEITA Image Scanner Committee

1. Requests

1) Sleep Mode Power Consumption Table 7 (Line 474)

It is not clear if “the Adder Type Scanner” on the table 7(Line 474) is applied to a Scanner (as a single device) or only to Product Types other than Scanners.

The Scanner (as a single device) has a light source as a standard equipment, so please specify that the adder of the Scanner is not applied to the Scanner (as a single device).

2) Operational Mode Default Delay Time (Line 419, Section 3.4.3)

Line 422 states that the maximum machine delay time shall be less than or equal to 4 hours, which is only adjustable by the manufacturer.

We understand that the users can adjust the maximum machine delay time within the range of the manufacturer-adjusted maximum time. But this is not specified in Draft1.

Similar to Version1.1 (see below Reference), we would appreciate if you could add following statements to 3.4.3.

“The default-delay-time settings provided in Tables 5 may be user adjustable.”

* Reference (from Version 1.1):

Default Delay Time Requirements: To qualify for ENERGY STAR, OM products must meet the default-delay time settings provided in Tables A through C below for each product type, enabled upon product shipment. In addition, all OM products must be shipped with a maximum machine delay time not in excess of four hours, which is only adjustable by the manufacturer. This maximum machine delay time cannot be influenced by the user and typically cannot be modified without internal, invasive product manipulation. The default-delay-time settings provided in Tables A through C may be user adjustable.

3) Standby (from Line 90/ from Line 532)

In case Scanner is connected to PC via USB, please allow that the Scanner will enter Standby Mode in conjunction with PC shutdown.

For image processing devices, it is general that the devices have a function for entering Standby Mode in conjunction with the power status of connected PCs.

We definitely believe that this function will save power, and this will meet the concept of Energy Star.

4) Effective date (Line 635)

Though the criteria for the sleep mode power consumption would be changed drastically, the effective date will be on March 1, 2013. Considering product life cycle, we think we need a period of grace (e.g. five years in case of safety standard) or other necessary measures (e.g. for the same type product launched before the effective date, the standard before revision is applied).

We would appreciate it if EPA reconsiders the effective date.

2. Questions

1) Sleep Mode Power Consumption Table 7 (Line 439, Section 3.4.4)

How can we evaluate the Adder Interface on following two conditions?

- Pattern 1) • A Scanner which has both USB3.0 and Wireless LAN.
- The Scanner can wake up from Sleep Mode to Ready States via both interfaces.
 - When testing in this state, can we add the Functional Adder Allowance (Table7) of these two interfaces?

$$AdderINTERFACE = 0.5W (USB3.0) + 2.0W (Wireless)$$

- Pattern 2) • A Scanner which has both USB2.0 and SCSI (parallel Interface)
- The Scanner can wake up from Sleep Mode to Ready States via only one interface
 - When testing in this state, can we add the Functional Adder Allowance (Table7) of these two interfaces?

$$AdderINTERFACE = 0.4W (USB2.0) + 0.2W (Parallel)$$

2) Standby Power Consumption (Line 524, Section 3.4.5)

Are there any criteria for the maximum delay time for entering Standby Mode automatically?

3) Toxicity and Recyclability Requirements (Line 547, Section 3.6.2.)

We do not understand the criteria for “ease of disassembly and recyclability” (3.6.2)
Could you please give us a clear explanation?

END