



Lexmark International, Inc.
 740 West New Circle Road
 Lexington, Kentucky 40550
 USA

Mr. Chris Kent
 ENERGY STAR Office Equipment Program Manager
 Office of Air and Radiation
 US Environmental Protection Agency

Subject: Comments on the ENERGY STAR Final Draft , V2.0 Imaging Equipment Specification

Dear Mr. Kent:

Lexmark offers the following comments on the Final Draft, V2.0 Imaging Equipment Specification

Toxicity and Recyclability Requirements

Lexmark is strongly opposed to adding non energy requirements to Energy Star. Despite EPA Management’s perspective, Energy Star is the accepted worldwide standard for energy efficiency of imaging equipment and other IT products. Adding non-energy criteria dilutes the Energy Star brand in our industry and makes the program less usable by our customers. Lexmark strongly recommends removing these criteria

However, since Energy Star has made is clear that these requirements are not up for debate or discussion, we offer the following comments regarding Section 3.2 of the Draft Partner Commitments. The criterion and the notes seem to be in conflict. The requirement in 3.2 is “The generally accepted attributes of a recyclable product at the date of product manufacture: where products shall be designed for ease of disassembly and recyclability where external enclosures, sub-enclosures, chassis and electronic subassemblies are easily removable with commonly available tools, by hand, or by a recycler’s automated processes.” Then the note references IEEE 1680.2-2012 Section 4.3.1. While the EPA recognizes “a recycler’s automated processes”, IEEE 1680.2-2012 section 4.3.1 does not. The IEEE standard only recognizes manual product disassembly. In addition, the Section 4.3.1 has two criteria, one required, one optional. What exactly is the EPA expecting manufacturers to comply with? The IEEE 1680.2 reference is only confusing the requirement to manufacturers.

Recommendation: Remove the note referencing IEEE 1680.2.

Separating A3 and A4 product specifications

The EPA has proposed separating the TEC limits for A3 and A4 products by creating a +0.2 kwh adder for A3 products. We believe that such a change would require the following changes to the specification.

1. A definition is needed for both A3/Ledger and A4/Letter products. This should be placed in Section 1.D. Lexmark recommends that you remove the “standard format” definition and create separate definitions for A3/Ledger and A4/Letter to be consistent with industry practice. The EPA will then need to update the various tables and references to the media format.
2. You need to update the database and systems to collect information on whether or not a product is A3 or A4. In the draft document, you assumed this would be based on filling in the Maximum Document size (another undefined term) in the OPS form. This field is optional for most product types.
3. You need guidance to CBs and test labs to verify/check whether a product is A3 or A4

Based on these changes, we recommend that the EPA issue another draft between the draft final and the final specification.

Technical Comments

We also offer the following specific comments on V2.0 Draft 1.0.

Line	Current text	Proposed Changes	Reasons of our change
297	-	Table 3 and 4 appear to be switched	Duplex requirements appear to be switched from previous drafts

431	Since recovery time (Active1 time) and Default Delay Time to Sleep are useful to consumers and 432 potentially a useful parameter for evaluating the impact of the Version 2.0 requirements on usability, EPA 433 proposes to require reporting of both recovery time (Active1 time) and Default Delay Time to Sleep for all 434 TEC products.	Either remove reporting of the recovery time or report all 3 values	-Active0 is closest to the claimed time to first page from Ready. This is usually the product claim for performance -Active1 is closest to the claimed time to first page from Sleep mode. This may be seen only 1x per day and is usually rarely experience by the customer. -Active2 is closest to the majority of uses of the product during the work day. Together, all 3 numbers can be useful. However an average or showing only 1 of the numbers is not helpful, it is confusing.
491	Required Default Delay Time to Sleep, <i>tSLEEP_REQ (minutes)</i>	Use “≤ “ in front on the values.	The current language can be read to mandate only 1 value for the default delay time rather than the limit on the default delay time. Energy Star has always allowed manufacturers to choose to use shorter default delay timeouts.
580	Effective Date... “October 1, 2013”	Revise effective date to 9 months after the release of the final specification	In order to comply with the 9 month time frame in EISA, this would mean that the Final specification would have to released on 1/1/2013. This is unlikely
556	ENERGY STAR Imaging Equipment Test Method, Rev. May-2012	Change to Test Method for determining Imaging Equipment Energy Use Version 2.0 – Final May 2012	Referenced test method name is incorrect

Regards,

Christopher A Saunders

Chris Saunders
Lexmark ENERGY STAR Program Coordinator