

As the technical manager of the accreditation for Energy Star specification for Imaging Equipment, included in our scope of accreditation, we would like to submit our comments about the — Version 2.0 of this Specification.

We hope this comment will help you to improve the process and methodology, as it is related to the Test Method clause 10.

Our comments are:

Test Method, clause 10.

According to this clause, the PSU losses will not be taken into account in any way. We think by doing this the losses in the PSU that are not considered and would put products measured in this way at an unfavorable position. This is because we think all the PSU losses would be transferred to the product. With the proposed method, you are subtracting DC power to AC power. The performance of the source can be determined by test, by the laboratory, so do not rely on information provided by the manufacturer, ensuring the independence and reliability of data. The above point will be unnecessary by simplifying the test method and measuring power directly at the input of the power supply, and treating the DFE power as an adder to the limit. This will help laboratories to maintain repeatability and independence on tests, because the help of manufacturer will not be necessary (with the proposed method laboratories have to rely on manufacturers to separate DFE circuits and do the correct measurement).

Please do not hesitate to contact me for any help or additional explanation.

Yours sincerely

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