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Environmental Protection Agency
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Fujitsu Computer Products of America/PFU Requests & Questions for ENERGY STAR Eligibility Criteria, Draft2 Version 2.0

Fujitsu/PFU Limited basically agrees to the Eligibility Criteria Draft2 Version 2.0 which defines the standard for promoting energy efficiency. Thank you for considering our feedback. There are some areas of the proposed draft specification that we would request EPA to clarify. We would be very appreciative that EPA can reply to our recommendations and questions.

1. REQUESTS

1) Line 175 (Product Family)

We have scanner products which have common hardware, but with different scanning speeds. When the power consumption values in the sleep mode/stand-by mode of such scanners are the same, can we apply for Energy Star within the same Product Family? If yes, could you please add "Product Speed" to the acceptable variations a) to d)?

Request:

Can we apply for Energy Star within the same Product Family?
If yes, could you please add "Product Speed" to the acceptable variations a) to d)?

2) Line 512/522 (Table 6: Sleep Mode Power Allowance for Base Marking Engine)

There is the statement, "removing models older than 2010" in Line 522. Even if the registration of the model has become old, if such a model is still sold in the market, please add such a model to data in order to judge a criterion value. Removing such models will result in an improper market analysis.

Request:

Please keep the older models that are still currently sold in the market.

3) Line 521 to 522 (To address these concerns, EPA reviewed and revised the data set by adding in some recently qualified products (as of April 12, 2012))

PFU requests to formulate a basic rule on data to calculate a criterion value. As you know, a product development will require a certain period of time, where we have to forecast a criterion value/effective date, and to feedback to engineering. If we cannot have a criterion value on time, new products will come out in the market, which will

change basic data again. Thus, we need to have a basic rule to calculate a criterion value.

Request:

Please provide a basic rule formula to calculate the criterion value.

4) Line 570 (Table 7: Sleep Mode Power Allowances for Functional Adders)

● Power Supply

In the column of "Power Supply", please specify the "scanner is exempt". Some of the scanner products have a numbering function (function to print alphabetic characters and numbers).

Since the printing mechanism normally stops functioning when in the sleep mode, this function should NOT be a functional adder of sleep mode power allowances.

Request:

Please remove printing mechanism from the functional adder and specify that the scanner is exempt.

● Touch Panel Display

Please delete Line 578 to 580 because the criteria on "the capacitive touch functionality of small displays" is not clear where only the technology (capacitive) and size (small) have been indicated, but their criteria are not precise. Regardless of the technology or size, "Touch Panel" itself should be a functional adder of sleep mode power allowances.

Request:

Please delete Line 578 to 580.

● Internal Disk Drivers

PFU understands that Disk Drives, which are included in DFE (Digital Front-end), should be "exempt". Please add to Note in order to clarify the statement.

Request:

Please add a Note in order to clarify the statement.

2. Questions (Continuous question from Draft 1)

1) Line 570 (Table 7: Sleep Mode Power Allowances for Functional Adders)

What will be the Adder INTERFACE for the following two patterns?

● Pattern 1 (Imaging product that utilizes both USB 3.0 and Wireless LAN)

Among such imaging products, there are some cases where the imaging product can return from the sleep mode to the ready state via both interfaces. When testing the product under this condition, can we add the "Functional Adder Allowance (Table7)" of two interfaces as follows?

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

● Pattern 2 (Imaging product that utilizes USB 2.0 and SCSI (Parallel I/F))

Among such imaging products, there are some cases where the imaging product can return from the sleep mode to the ready state via only one interface. When testing the product under this condition, can we add the "Functional Adder Allowance (Table7)" of two interfaces as follows?

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

Yours Sincerely,

Marcus Chong
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Fujitsu Computer Products of America, Inc.