

ENERGY STAR Eligibility Criteria Draft2 Version2.0 Opinion Brief**1. Requests****(1) Product Family (Line 175)**

- With regard to scanners, there are products that have the same hardware but different scanning speeds. If power consumption during Sleep Mode and Standby Mode are equivalent for such devices, is it possible to apply for such products as a product family? If it is possible to deem them as part of the same product family, please add “Product Speed” to the current conditions (a to d).

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

There is the phrase “removing models older than 2010” (Line 522). Even if the registration of a product is old, please include products that are currently being sold as part of the data in order to determine reference values.

This is because if such products are removed, it would mean that mistaken market analysis is being conducted.

(3) Establish standard rules (rough indicators) for data used in calculating reference values

There is the phrase, “EPA reviewed and revised the data set by adding in some recently qualified products (as of April 12, 2012),” (Line 521). If decisions regarding acceptance criteria are prolonged or if the date of enforcement is delayed from the original plan, market launches of new products are also carried out as needed, and the market data that serves as the rough indicator for calculating reference values changes. At the same time, from the perspective of product development, since it is necessary to provide feedback to design, it is desirable to increase the accuracy of reference values for calculation. As a result, the formulation of basic rules (rough indicators) for data to be used in calculating reference values is requested.

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

- With regard to the section on Power Supply, please indicate clearly that scanners are not applicable. Scanner products include products that have a numbering function (function where alphanumeric characters are printed). However, generally, the printing part is in a non-operating condition during Sleep Mode, and this function should not be made an additional function for the permissible value for consumed energy.
- With regard to the section on Touch Panel Display, the contents of the note (Note: Line 578) are unclear. Please delete this note. “The capacitive touch functionality of small displays,” as well as Technology (capacitive) and Size (small) are limited. These standards are unclear; regardless of the relationship to these, they should be made into an additional function for the permissible value for consumed energy.
- With regard to the section on Internal Disk Drives, we believe that Disk Drives included in DFE do not correspond. Please add this as a note, in order to make the standards clear as well.

2. Questions

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

What is happen to *AdderINTERFACE* with the concrete patterns below?

Pattern 1) Imaging equipment image scanner product that possesses both USB3.0 and wireless LAN

- As there is a state where it is possible to return to Ready State from Sleep Mode on both interfaces, when conducting experiments in this state, is it acceptable to add the “Functional Adder Allowance (Table 7) for the two I/Fs?

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

Pattern 2) Imaging equipment image scanner product that possesses both USB2.0 and SCSI (parallel I/F)

- As there is a state where it is possible to return to Ready State from Sleep Mode on a single interface only, when conducting experiments in this state, is it acceptable to add the “Functional Adder Allowance (Table 7)” for the two I/Fs?

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

END