



July 30, 2012

Christopher Kent
Product Manager Imaging Equipment
ENERGY STAR Program

Subject: Draft 2 Version 2.0 ENERGY STAR® Imaging Equipment Specification

Dear Mr. Kent,

The Coalition for Government Procurement appreciates the opportunity to submit the following comments on the Draft 2 Version 2.0 ENERGY STAR Imaging Equipment specifications.

The Coalition for Government Procurement is a non-profit association of approximately 300 firms selling commercial services and products to the Federal Government. Our members collectively account for approximately 70% of the sales generated through the General Services Administration (GSA) Multiple Award Schedules (MAS) program and about half of the commercial item solutions purchased annually by the Federal Government. We represent companies that sell Office Imaging and Document Solutions under MAS Schedule 36 which provides imaging equipment to Federal civilian agency and Department of Defense customers government-wide.

Impact on Competition

Our interest in submitting comments on the Draft 2 Version 2.0 ENERGY STAR Imaging Equipment specifications relates to the potential negative impact on competition in the Government procurement market. For nearly 30 years, Coalition member companies have been providing imaging equipment to Federal agencies through GSA contracts. A key strength of GSA's MAS Schedule contracts is how well they reflect the commercial market. Based on this model, Federal agencies are able to purchase copiers, MFDs, and printers at various prices, speeds, and functionality – much like a commercial customer.

Maintaining competition for imaging products is key to lowering costs for the Government. By decreasing the pool of products available in the Government market, the update to the ENERGY STAR standards for imaging equipment will limit competition and the costs of these products may actually increase for Federal agencies and the American taxpayer.

Impact on GSA Schedules

We are concerned that the update of the ENERGY STAR imaging equipment specification will decrease the availability of products under the GSA Schedule. GSA's Schedule 36 contract for Office Imaging and Document Solutions currently requires that all products qualify for the ENERGY STAR. As a result, any new imaging equipment models that fail to meet the new specifications will be unavailable for Federal agencies under the GSA Schedules. Also, any products that lose their ENERGY STAR qualification are at risk of being removed from the contract. This will inevitably impact the availability of imaging equipment under the GSA Schedules, agency Blanket Purchase Agreements (BPAs) under the Schedules program, and the Office of Management and Budget's government-wide Federal Strategic Sourcing Initiative for Managed Print Services.

Recommendations

The Coalition recommends that the EPA 1) set the Version 2.0 ENERGY STAR standards for imaging equipment so that *at least* 25% of the products in each speed band qualify, 2) revisit the requirements for 30- 40ppm B/W copiers and printers, and 3) allow manufacturers 18 months to prepare before the effective date.

First, we would like to acknowledge EPA's efforts to increase the number of qualified products within the identified speed ranges. From Draft 1 to Draft 2, there were fewer speed bands that were of concern to our members. The two speed ranges that we ask EPA to revisit are for B/W copiers between 30- 40ppm and B/W printers between 30- 40ppm. Based on an assessment of products registered in the ENERGY STAR qualified product list (as of June 16, 2012), only 10% of products in this segment qualified under Draft 2. In addition, the Coalition requests that the EPA maintain its commitment to making an adequate number of qualified products available in finalizing Version 2.0 of the specification. Finally, we ask that the EPA provide 18 months for manufacturers and Federal agencies to prepare between the release of the final Version 2.0 ENERGY STAR Imaging Equipment specification and the effective date. Therefore, if the final is released in October 2012 as anticipated, we request that the effective date be in April 2014. Manufacturers will need this time to adjust to the updated test method and release new products that meet these standards.

Thank you again for the opportunity to provide input regarding draft 2 Version 2.0 of the ENERGY STAR® Imaging Equipment specification. Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger Waldron", with a long horizontal flourish extending to the right.

Roger Waldron
President