



Diane O'Connor
Vice President
Global Environment, Health,
Safety & Sustainability

Xerox Corporation
800 Phillips Road
MS 0205-99F
Webster, NY 14580

Dianep.oconnor@xerox.com
tel 585.265.7716

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Mr. Christopher Kent
Energy Star Program
US Environmental Protection Agency
Washington, DC

Dear Mr. Kent:

Xerox Corporation is pleased to submit these comments to the EPA regarding the ENERGY STAR Product Specification for Imaging Equipment v2.0, draft 2.

ENERGY STAR – Version 2.0 – DRAFT 2 - Comments

1. Page 12, section 3.3.3: "Additional Test Results Reporting Requirements: Recovery time (Active 1 time) and Default Delay Time shall be reported for all products tested using the TEC test method.

Note: Since recovery time (Active 1 time) and Default Delay Time to Sleep are useful to consumers and potentially a useful parameter for evaluating the impact of the Version 2.0 requirements on usability, EPA proposes to require reporting of both recovery time (Active 1 time) and Default Delay Time to Sleep for all TEC products.

Additionally, EPA proposes including this information on the Version 2.0 Qualified Product List (QPL)."

Comment: While we agree that a recovery time requirement should not be included in the specification, we do not support the proposal to include the recovery time data on the qualified product listing. There are several factors that could affect recovery times including file type and size, time in lower power modes, method of sending job (USB or Ethernet), etc. As such, there is too much variation on recovery time measurements. Although the proposed test method should create a uniform approach on some of these factors, some Manufacturers also advertise recovery times from Sleep modes in product literature which use different factors not similar to the ENERGY STAR test method. If there is variation in the posted recovery times, it may cause customer confusion. We recommend omitting this requirement and allowing for Manufacturers to determine if they post recovery times in their product literature.

2. Page 9, section 3.3.1 Automatic Duplexing Capability:

Comment: We appreciate EPA's willingness to raise the automatic duplexing requirement from >19ipm to >26ipm. However, we suggest that EPA retain the version 1.2 duplex requirements as it will allow customers to choose lower priced ENERGY STAR qualified options in the middle speed band range (20-39 ipm or 25-44 ipm) where lower print volumes are seen while retaining the duplex standard requirement for faster products with higher print volumes.

3. Page 10, section 3.3.1 – EPA's proposal to omit the clarification memo duplex statement allowance.

Comment: The original reasons that manufacturers used for requesting the clarification for the marking of duplex products are still valid:

- A manufacturer builds a base unit that meets the energy requirements of Version 1.0 in one location. The manufacturer does not know at the time of manufacture if the product will be sold with a duplex unit.
 - A manufacturer builds modular products which allow the end user to order a wide range of options at time of purchase. A customer may make use of accessories purchased with a previous iteration of a product with a newer iteration. As such, a customer may not wish to purchase a second duplex when buying the newer version of this new high speed imaging product. Again, the manufacturer applies the ENERGY STAR label to the basic engine that qualifies for ENERGY STAR at the time of production and will not know at this time if the duplex will be ordered.
 - The high speed imaging product may be sold with a duplex tray, but this tray and the capability may not be exploited once received by the dealer. We request that EPA reconsider this change. To comply with the proposed change would require manufacturers to create new product configurations that include the duplex feature as standard. For cost sensitive products it may not make economic sense for manufacturers to market two versions of a product where the only difference is duplex (and ENERGY STAR). This could result in manufactures eliminating some ENERGY STAR qualified products from their product lines. In addition, the EPA states that the goal of this change is to 'avoid customer confusion'. We would oppose this change absent evidence or data showing that this is a real problem.
4. Page 19, section 6.1.1 Effective Date
Comment: We request clarification with regards to the test requirements for v2.0. Please confirm that test data that is collected and certified by an EPA recognized Certification Body using the current test method prior to the July 2013 implementation date will be accepted for product qualifications under the new v2.0 specifications. Forcing manufactures to retest products that have already been tested and certified by an EPA recognized Certification Body would place an undue financial burden on manufactures with little or no benefit to consumers.
5. Partner Commitments – page 1 – Qualifying Products, #3 - RoHS and Ease of Disassembly and Recyclability Requirements:
Comment: We do not support addition of these requirements. These requirements are already covered under existing regulations or other standards (e.g. IEEE 1680.2/EPEAT); therefore, the requirements seem duplicative. Additionally, there is significant uncertainty of what type of supporting documentation will be required by EPA upon request. These requirements are complex and, if EPA seeks to include these requirements, more time should be spent in clarifying the details. As such, we suggest considering these requirements for a later version when more time can be spent clarifying the details.

Sincerely,



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