



Version 2.0 Imaging Equipment QPX Draft Data Requirements Comment Summary

April 3, 2013

EPA would like to thank stakeholders for taking time to review the Imaging Equipment Version 2.0 draft data requirements and providing valuable feedback on the proposed data requirements. Below is a list of key changes/elements that have been incorporated into the Imaging Equipment Version 2.0 final data requirements:

Core ENERGY STAR Data Requirements (Applicable to All ENERGY STAR Product Categories):

- **Required Versus Optional:** EPA would like to clarify the use of required and optional data requirements. For required fields, CBs must provide data for the field for all Imaging Equipment Version 2.0 certified models (e.g. Model Name). For optional fields, CBs are conditionally required to provide information if the requirements in the Description field are met (e.g., "Required for MFD or digital duplicator models").
- **ENERGY STAR Model Identifier, Certification ID, and Family ID:** Model identifiers generated by CBs to classify and associate models.
- **Markets Where Model is Sold:** EPA has entered into agreements with several foreign governments to promote specific ENERGY STAR qualified products in their markets. For Imaging Equipment models, EPA displays models on the imaging equipment qualified product list for models available in the U.S. and/or Canada and exports information for models available in the European Union to the European Free Trade Association. More information on ENERGY STAR International Partners is available at www.energystar.gov/international
- **Voltage Data Reporting Requirements:** Traditionally, EPA collected self-reported energy performance of qualified models for all markets where the product is sold. In converting to the third-party certification program, EPA has reviewed relevant data collection and its usage and has removed any data irrelevant to qualification of the product for the U.S. (and those markets where there exists a data exchange program) to reduce reporting burden. While updating the relevant specifications along with their new certified data requirements, EPA has removed the reporting of test data at 100 volts but has retained the reporting of testing at 115 volts and 230 volts.

Imaging Equipment-specific Data Requirements:

- **Publicly Available Data:** EPA anticipates making the following fields publicly available through the updated Version 2.0 qualified products list (QPL)
 - Information currently included on the current Version 1.2 imaging equipment QPL, and
 - Additional information listed in the Imaging Equipment Version 2.0 Program Requirements (see Section 3.3.3, "Additional Test Results Reporting Requirements").

- **Division of Standard Format into Standard-A3 and Standard-A4:** EPA did not add A3/A4 capability under the Media Size Format field, as the broad categories in this field (Small, Standard, Large) are used for determining whether OM or TEC requirements apply, while A3 capability is of lesser importance (an adder allowance on top of the TEC requirements). A3 capability will be determined through the Maximum Document Width field.
- **Bit-depth and Dots per Inch:** EPA agrees with stakeholders that this information is not used for qualification, is not helpful to consumers, nor is likely to inform a future specification revision, and so has removed the following fields: Grayscale and Color Bit-depth; Black and Color Dots Per Inch; Scanner Optical and Interpolated Resolution: Horizontal/Vertical DPI.
- **Power Supply Rated Output Power:** Despite stakeholder comment, EPA has kept this field as Required, as it may have bearing on a future specification revision. During the Version 2.0 development process, stakeholders indicated that power supply output power can serve as a proxy for product functionality.
- **Minimum/Maximum Paper Weight:** Despite stakeholder comment, EPA has kept the Simplex/Duplex Printing Minimum Paper Weight fields because lighter paper may save overall energy consumption, and paper weight is a parameter reported by manufacturers. Furthermore, EPA has added Simplex/Duplex Printing Maximum Paper Weight fields because stakeholders commented that the ability to print on heavier paper may be a distinguishing characteristic of higher-volume, higher-capability "professional products", which could be subject to different requirements in a future specification revision. Lastly, EPA changed the units in these fields from "gsm" to "g/m²", which is consistent with the SI system of units.
- **Time Measurements in Hours:** Stakeholders commented that time measurements should be reported in seconds, not hours as specified in the draft data requirements. EPA agrees with stakeholders but is constrained by the test method, which requires reporting in minutes. Therefore, EPA has changed the data requirements to minutes but will convert any time data to seconds before reporting to end-users on the QPL.