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

Sent via e-mail Kent.Christopher@epa.gov

Re: Comments on Test Method for Determining Imaging Equipment Energy Use Version 2.0 – Draft 2 (1) Rev. Nov-2011

Dear Mr. Kent:

Thank you for the opportunity to review and comment on the above referenced document. Xerox Corporation would like to offer the following in response for your consideration:

- (1) Section 3: Regarding a definition for “draft mode” that attempts to meet the EPA requirement of being “based on quantifiable performance characteristics,” we would propose that draft mode = fastest print mode that enables previewing of work and may be useful for rush jobs. Visual inspection shall not detect defects that deter from readability and basic concept previewing.
- (2) Section 8, Table 8, Step 10: The last sentence states “if unit began this step while in Auto-off mode, report both energy and time values as zero.” Should this be omitted from Step 10? Section 7 (A)(3)(a)(a) mentions that Auto-off feature should be turned off for TEC testing, so the requirement in Section 8 appears redundant.
- (3) Section 10: The note indicates that “DOE and EPA intend to incentivize energy efficiency of imaging products with DFE’s... This change will require retesting of all imaging equipment units with DFE’s.” The requirement to retest is an added expense for manufacturers with little benefit to consumers. It would be more appropriate to apply the requirement to new products that are being submitted for qualification and to exempt those products with DFE’s that have already completed the qualification process through a CB. Also, a change of this magnitude should be reserved for a future specification update (V3.0) after EPA has collected the appropriate product data.

Thank you again for the opportunity to comment and your consideration.

Sincerely,



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