

Comment for the
ENERGY STAR Program Requirements for Imaging Equipment – Draft 2 V1.1

Dear Sirs.
CIAJ reviewed the DRAFT2 ENERGY STAR specification (Version 1.1) for Imaging Equipment.

Now, we would like to let comment for the FAX machines. We wish you to consider, and make the best solution for this item.

(1)Line 507 to 509
About Maximum Standby Power Levels for All Small Format and Standard-size OM Products with Fax Capability (Page 14)
This comment relates to Table D in p.14. 2W of maximum standby power level for all small format and standard-size OM products with FAX capability is changed into 1W in the draft 2.

In the draft of ENERGY STAR Program Requirements for Imaging Equipment, Standby is defined as "The lowest power consumption mode which cannot be switched off (influenced) by the user and that may persist for an indefinite time when the product is connected to the main electricity supply and used in accordance with the manufacturer's instructions". In addition, it is explained as "For Imaging Equipment products addressed by this specification, the Standby power level usually occurs in Off mode, but can occur in Ready or Sleep. A product cannot exit Standby and reach a lower power state unless it is physically disconnected from the main electricity supply as a result of manual manipulation."

Some products with FAX capability in the current market always make the network function on and are able to receive FAX messages in order to match the products' main purpose/usage or to improve their usability.

For such products, "Standby" occurs in "Sleep" or "Ready", and energy consumption in their "Standby" may become higher than others.

Some OM products with FAX capability don't have power switch with a view to having the ability to receive messages even in "Standby".

On the other hand, "Standby" power is proposed as 1W whether the products have FAX capability or not, in the Table D in p.14 of Draft 2 of the Program Requirements for Imaging Equipment ver 1.1.

Of course, "Standby 1W" can be attained in products with FAX capability by adding power switch to them with a view to making unable to receive messages in "Standby". However, as discussed above, manufacturers who design their products with a view to having ability to receive FAX also in the lowest power mode when they are plugged in to a power supply would need longer period for design change with the change of the concept of "Standby".

Therefore, in order to give enough period to change the design concept, we would like to propose that "Standby" criteria be changed at next revision of requirements for Imaging Equipments. That is, maximum standby power level for all small format and standard-size OM products with FAX capability remains as 2 W.

Best Regards,