

## Comments on Energy Star Imaging Equipment Final Draft

September 16.2008

Communications and Information Association of Japan(CIAJ)

### **About Maximum Standby Power Levels for All Small Format and Standard-size OM Products with Fax Capability ( Table D, P14. )**

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 2<sup>nd</sup> draft, and it's kept in the final draft.

“Standby” power is proposed as 1W whether the products have FAX capability or not, in the Table D in p.14 of the final draft of the Program Requirements for Imaging Equipment ver 1.1. The note for that says "This 1.0 W Standby requirements is consistent with international criteria". Please let us know what are the referenced “international criteria” exactly.

There are some movement for legislation of “Standby 1W”, for example, in the EU. However, “Standby<sup>1</sup> 1W” requirements in the draft Regulation under the EuP Directive only cover “stand alone” standby which does not have network connections. The products with FAX function are intended to be always used in the network of course, and therefore they are not covered by “Standby 1W” requirements under the EuP Directive.

Furthermore, the definition of “Standby” in the International Standards IEC 62301 is now under consideration, and the CD which was proposed in last November defines "Standby mode" in distinguishing from "Network connected standby mode(s)". For example, the EU draft Regulation reflects this draft proposal for IEC standards, and its application of criteria of “Standby 1W” is limited only to “Standby” which is not “Network connected standby”.

In contrast, the introduction into the Energy Star of such criteria reflecting draft IEC revision (distinguishing between “Standby” and “Networked standby”) might cause confusion for Industry in choosing design options, though the definition of “Standby” in Energy Star is the same as current IEC Standards (not distinguishing “Standby” from “Networked standby”).

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<sup>1</sup> The definition of “Standby mode(s)” in Article 2 (2) of the "COMMISSION REGULATION (EC) No .../..of implementing Directive 2005/32/EC of the European Parliament and of the Council with regard to ecodesign requirements for standby and off mode electric power consumption of electrical and electronic household and office equipment" as of July 2008 (The version approved by the Regulatory Committee)

"standby mode(s)" means a condition where the equipment is connected to the mains power source, depends on energy input from the mains power source to work as intended and provides only the following functions, which may persist for an indefinite time:

- reactivation function, or reactivation function and only an indication of enabled reactivation function, and/or
- information or status display.

Until now, 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.". This definition comes from IEC 62301 – Household electrical appliances – Measurement of standby power (2005), and it is usually understood as the lowest power mode when a product is plugged in to a power supply.

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.

It is our understanding that FEMP has recommended 2W as standby power for products with FAX capability in spite of higher than other products, in considering power for receiving FAX messages as described above. FEMP recommended level of Standby for FAX is still 2W. According to this FEMP recommendation, some OM products with FAX capability don't have power switch with a view to having the ability to receive messages even in "Standby".

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. The future revision of "Standby" according to the change of international standards such as revision of IEC 62301 be only announced at this time.

Best Regards,