

Canon comments on ENERGY STAR “Proposed Modifications to the Test Method Draft 2”

As of November 21, 2011

Section	Current draft text	Proposed amendments <i>(Shown in italic, red font)</i>	Reasons of our proposals
<p>Draft 2 Test Method Page 5 of 18 6 PRE-TEST UUT CONFIGURATION FOR ALL PRODUCTS 6.1 General Configuration A) Product Speed for Calculations and Reporting 3)</p>	<p>For non-Continuous Form products, with the exception of mailing machines, the product speed shall be calculated per Table 5. If the maximum claimed speeds differ when producing images on different sizes of paper (e.g., A4 versus 8.5” x 11”), the highest speed shall be used.</p>	<p>The second sentence should be modified as follows: <i>When a manufacturer intends to get a product qualified in a certain market by making use of existing test results already conducted for the product in another market using</i> other sizes of paper (e.g., A4 versus 8.5” x 11”), <i>and if its</i> maximum claimed speeds differ <i>in</i> producing images on different sizes of paper, the highest speed shall be used.</p>	<p>We believe that the condition to which this sentence is applicable should be clearly stated. The second sentence would be intended to be applied only when a manufacturer would like to get a qualification for a product in a certain market by making use of existing test results already conducted for the product in another market based on mutual recognition scheme between the U.S. and other countries. The purpose would be avoidance of additional testing in such situation. On the other hand, when a product is intended to be got qualified only in a certain market, we believe that the maximum claimed speed based on the paper size used in that market would be naturally used in testing and also in calculation and reporting. However, if the current text without any conditioning would be kept, manufacturers may have to use the maximum claimed speed based on the paper size which is used in unintended market in the calculation and reporting. This is unreasonable and doesn't seem to be EPA's intention.</p>
<p>Draft 2 Test Method Page 7 of 18</p>		<p>Table 6 should be kept the column for "Connections for</p>	<p>The 2nd draft test methods unify two columns for “Connections for Standard-format Ink Jet and Impact</p>

Section	Current draft text	Proposed amendments <i>(Shown in italic, red font)</i>	Reasons of our proposals
<p>6 PRE-TEST UUT CONFIGURATION FOR ALL PRODUCTS</p> <p>6.1 General Configuration</p> <p>C) Network Connections</p> <p>Table 6: Network or Data Connections for Use in Test</p>	<p>Connections for all Products</p> <ol style="list-style-type: none"> 1. Ethernet - 1 Gb/s 2. Ethernet - 100 Mb/s 3. USB 3.x 4. USB 2.x 5. USB 1.x 6. RS232 7. IEE1284 8. Wi-Fi <p>...</p>	<p>Standard-format Ink Jet and Impact Printers and MFDs" as in the 1st draft Test Methods (Jul. 2011).</p> <p>Revive following column as the middle column of Table 6:</p> <p><i>Connections for Standard-format Ink Jet and Impact Printers and MFDs</i></p> <ol style="list-style-type: none"> 1. Ethernet - 1 Gb/s 2. Ethernet - 100 Mb/s 3. <i>Wi-Fi</i> 4. USB 3.x 5. USB 2.x 6. USB 1.x 7. RS232 8. IEE1284 <p>...</p> <p>Change the title of current column "Connections for all Products" to "<i>Connections for all TEC Products and OM Products Except for Standard-format Ink Jet and Impact Printers and MFDs</i>"</p>	<p>Printers and MFDs" and for "Connections for all TEC Products and OM Products Except for Standard-format Ink Jet and Impact Printers and MFDs" to "Connections for all Products". However, we believe these product categories should be separate as before and the Table 6 proposed in the 1st draft should be revived, because of the market trend of Ink Jet and Impact products.</p> <p>We understand the Energy Star Specifications have been made according to the policy in which network connections such as Ethernet are given priority over data connections such as USB*, and we agree with this order of priority.</p> <p>*Based on the concept of "C) Network Connections" (Page 5 of 14) of "6.1 General Configuration" of "6 PRE-TEST UUT CONFIGURATION FOR ALL PRODUCTS" in current specification Ver.1.2</p> <p>Therefore, we believe that priority should be given to wired network (Ethernet) at first, and to wireless network (WiFi) at the next according to this concept, for Ink-Jet and Impact products.</p> <p>Furthermore, as the result of our review,</p> <ol style="list-style-type: none"> 1) As a market trend, ink-jet products with network connections have increased more and more. 2) Regulation on energy efficiency in networked standby

Section	Current draft text	Proposed amendments <i>(Shown in italic, red font)</i>	Reasons of our proposals
			<p>mode(s) is now discussed also under the ErP Directive in the EU.</p> <p>From the above, we believe the promotion of energy saving would be needed as social demands, and would like to propose the revival of 1st draft Table 6 which give network connections priority.</p>
<p>Draft 2 Test Method Page 9 of 18 7 PRE-TEST UUT INITIALIZATION FOR ALL PRODUCTS A) 1) a)</p>	<p>Accessories such as paper source and finishing hardware that are intended to be installed or attached by the end-user shall be installed.</p>	<p>This sentence should be kept as that in previous draft methods as follows:</p> <p>Accessories such as paper source and finishing hardware that are intended to be installed or attached by the end-user shall be installed; <i>however, their use in the test is at the manufacturer's discretion (e.g., any paper source may be used).</i></p>	<p>The deletion of this phrase is not included in the revised points listed in the cover letter, and we cannot understand the reason why EPA newly deletes it in the 2nd draft test methods.</p> <p>It would be the manufacturers who most understand intended use of accessories as well as typical combination when users use them. This is why the manufacturers currently give instructions to certified laboratories on the basis of wealth of their knowledge.</p> <p>In this situation, the deletion of this phrase is very likely to cause confusion both among laboratories and manufacturers.</p> <p>We believe that current description on accessories used at the testing should be kept as in the previous text, in order to avoid such possible and useless confusions.</p>