

Seiko Epson comments on:

ENERGY STAR Imaging Equipment Version 2.0 Specification Revision Discussion Document
March 2011

Issue 7:

Epson agrees. We believe the scope of this specification can be applied regardless of printing technique. This could include minilabs. We are studying methods to provide product performance data in the future.

Issue 16:

Epson agrees. It will be necessary to clarify the definition of "Recovery Time." E.g.: Should recovery time be from the print command to the start of printing? (Currently, we consider recovery time to be the time from the print command until the first printed sheet is ejected.)

Issues 15-17:

We agree that there should be more specific procedures for testing recovery time. After procedures are clearly specified the data that was used for Figure 4 should be re-verified. Further, EPA should quantify the relationship between recovery time and power consumption. (e.g., do shorter recovery times result in higher power consumption?)

Issue 19:

We do not believe this change would benefit the consumer. Test methods should be based on real-world conditions. If the power usage derived from testing a single I/F is lower than what an end-user user experiences with multiple I/Fs it could result in a negative customer experience.

Issue 20:

Epson agrees. The most commonly used I/F changes depending on the printing environment. USB and WiFi are most common in homes, while Ethernet is most common in the office. Epson's suggestion is to prioritize the most power-hungry I/F – WiFi.

Issue 24:

Epson agrees. Please consider the adoption of Energy Efficient Ethernet as it may be an advantage to the consumer.

Issue 25:

We believe that this change should not be implemented and that receipt printers, ink jet printers for business, etc. should continue to be tested using the OM method for the following reasons:

- It would be difficult to set specific test methods because compared to TEC products customers use these products in various non-standardized ways.

- It would be difficult for manufacturers to test them using similar conditions. Unlike TEC devices the products mentioned have very different form widths, form lengths, dithering patterns, number of rows/columns, printing speeds, etc.

This should be studied by comparing operating conditions in user environments and collecting test data using both OM and TEC methods.