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Energy Star Program Test method for determining imaging equipment energy use
Version 2.0 – Draft 2 (1) Rev. Nov-2011

Here are the PFU requests and comments on six (6) items on the Test Method for Determining Imaging Equipment Energy use Version 2.0 - Draft 2 (2) Rev. Nov-2011.

1. No.4, C) Low-voltage Dc Input Power (Request)

1) Request-1 (for USB controlled Device measurement conditions)

1-1) Regardless of whether the devices is powered with a low-voltage DC source or not, any devices with USB I/F should be admitted even when the computer shuts down and the device enters the power saving mode.

1-2) UUT can monitor the USB Vbus (=5VDC) where UUT detects a voltage change when Vbus changes from 5VDC to "0VDC", and is enable to switch to the stand-by mode.

2) Request-2

2-1) The DC power (DC voltage*Current) as the same as DFE should be required rather than making the AC power consumption of the DC powered devices (e.g. USB hub with EPS) as a requirement.

<Reason>

The efficiency characteristic of the DC powered devices (e.g. USB hub with EPS etc.) is nonlinear. If it is optional, it brings unfairness to manufacturers. Making the UUT measurement as DC power (DC voltage*Current) instead removes all the uncertainties, bringing fairness to all manufacturers. This is essentially the same reason as the reason EPA changes the report/conformity conditions of the DEF power from AC to DC power.

2. No.4, G) Measurement Uncertainty (Agree)

The Draft-1 quoted IEC, but Draft-2 revises and has more specific descriptions. Thus, PFU agrees to this section in Draft-2.

3. No. 6.1 A) Product Speed for Calculations and Reporting (Comment on "Note")

The product speed should be the "highest" speed.

4. NO.6.1 C) Network Connections (Agree)

PFU agrees to this section in Draft-2 because the priorities for specific I/F connection remove the ambiguities when in testing.

5. No.6.1 C Network Connections (Disagree on "Note")

PFU disagrees with the following statement:

"...DOE and EPA are considering eliminating allowances for functional adders, such as data and network connections ..."

<Reason>

The allowances should be kept because it is the must for usability and added values for the customers though the interface function may be a factor to increase the power in any way as compared with the power for the device engines only.

6. No. 10 TEST PROCEDURES FOR PRODUCTS WITH A DIGITAL FRONT END (DFE) (Agree)
PFU agrees with the following statement:

“...If the DFE does not have a separate main power cord, the manufacturer shall measure the dc power required for the DFE when the unit as a whole is in Ready Mode”.

In the meantime, PFU strongly requests that the DEF power should be removed from the powers of a whole device as the same as the existing standard.

In the exiting standard, how to add and measure the power source efficiency has not been specified, remaining unfairness to the manufacturers. However, the Draft-2 removes the ambiguities, thus PFU agrees to this section in Draft-2.