JBMIA comments on

The following is a summary of JBMIA comment on “Test Method for Determining Imaging Equipment Energy Use Rev. Jul-2011”. We have raised points concerning, not only the items, which are proposed to change this time, but also such items, as we deem necessary to be updated for clearer definition etc.

3 TEST SETUP
B) AC Input Power
2) In Japanese market there exist products with rated 200V/50Hz or 60Hz. To test such products with 230V/50Hz, which is rated values for European market, may cause safety problems. These should be tested with their rated voltage 200V and rated frequency 50Hz or 60Hz. We propose adding a sentence to 2):

2) If a product is designed to operate at a voltage/frequency combination in a specific market that is different from the voltage/frequency combination for that market (e.g., 230 volts (V), 60 hertz (Hz) in North America), the manufacturer should test the product at the regional combination that most closely matches the product's design capabilities and note this fact on the test reporting sheet.

However, if there should be a safety problem, the product may be tested with its designed rated voltage and frequency, noting this fact on the test reporting sheet.

4 PRE-TEST UUT CONFIGURATIONS FOR ALL PRODUCTS
4.1 General Configuration
A) Product Speed for Calculations and Reporting:
In Table4 testing paper size and weight is specified for each market. Taking this into consideration, the last sentence of 3) (If the maximum claimed speeds differ when producing images on A4 or 8.5”×11” paper, the higher of the two shall be used.) seems a bit awkward, since there is no market, where A4 and 8.5”×11” paper sizes are specified.

The product speed should be defined with the tested paper size. Therefore, we request to delete the sentence in question.

C) Network Connections
1) We request adding the following sentence to 1).

The network-connected PC shall send out a SNMP packet at least once in every ten minutes.
2) We would like to make sure that products with default 10 Gigabits per second (Gb/s) Ethernet shall be tested at 1 Gb/s. Also, products with default USB only, which has an optional expandability to 1 Gigabits per second (1Gb/s) Ethernet, may be tested with USB. Is this understanding correct?

4.2 Configuration for Fax Machines
A) In previous JBMIA comments we remarked that connecting to a telephone line increases power consumption. After further investigation, however, it is now assured that no additional power consumption exists, as long as FAX is not active during the test, even when a telephone line is connected. In TEC measurement FAX is not activated during the test. Therefore, there should be no difference in power consumption between with or without connection to a telephone line. Thus connection to a telephone line would be unnecessary. JBMIA requests not to connect to a telephone line during test, which is the same as the current test procedure.

6 TYPICAL ELECTRICITY CONSUMPTION (TEC) TEST PROCEDURE
6.2 Measurement Procedures
A) Measurement of TEC
2) Duplexing:
   It is proposed that products shall be tested in simplex mode, unless the speed of duplex mode output is greater than the speed of simplex mode output. Also, in 5 A)1) ii) it is proposed that if the product is connected to a computer during the test, the computer shall be running the manufacturer’s default driver using settings corresponding to the default settings upon shipment.

   In EPEAT (IEEE P1680.2/D3 Draft Standard for Environmental Assessment of Imaging Equipment 4.5.4.1) automatic duplex printing with default print driver is required. When this becomes effective, a number of products are expected to be shipped with default automatic duplex mode. This means, when such products get EPEAT approval, TEC testing for those products cannot be carried out, since simplex mode with default driver is impossible.

   Therefore, we request to add a sentence to 5 A) 1) ii).

   If the product is connected to a computer during the test, the computer shall be running the manufacturer’s default driver using setting to the default settings upon shipment. In case automatic duplex mode should have been selected as default driver setting, this shall be changed to simplex mode.

Table 8 and Table 9
“Step 3 Active0 time”

   When a set-up sequence is carried out before the first print after power on, or, when it is ambiguous as to the start point of ready (e.g. with a start reservation
function activated), an exact “Active0 time” is hard to grasp. Consequently, “Recovery time” which is calculated using “Active0 time” will be incorrect. Thus following modification (two options) is desirable:

Option1 = Add a note
When a set-up sequence is carried out before the first print after power on, or, when it is ambiguous as to the start point of ready, carry out the second job immediately after the completion of the first job to measure and record time to first sheet exiting unit.

Option2 = Modify the description of Step 3 as follows:
According to Table 11, carry out the specified job twice without intervention. The first job is a dummy copying (printing). At the second job, measure and record the time to first sheet exiting unit.

“Step 7 Active2 time”
Active2 time is not necessary for the calculation of recovery time and not used for TEC, either. We deem Active2 time is now unnecessary and request deleting it.

10 Appendix A: TEST REPORTING TEMPLATE
As in Test Results there is an item “Recovery Time (min)”, its definition shall be clarified as follows:

“Recovery Time” = “Active1 time” - “Active0 time”

In addition, the unit of Recovery Time, Active0 time and Active1 time should be “seconds” rather than “minutes.” The former is more realistic.
Also, there is an item “Time to Ready Mode (min)” but this would be unnecessary for TEC. We request to delete this item.

END