

JBMIA Comments on
ENERGY STAR Product Specification for Imaging Equipment
Eligibility Criteria Draft1 Version 2.0

(2012.03.01.16 : 50)

line 143:

The expression “its own external ac power supply” should be revised as “its own ac power supply (internal or external)”, as symmetrical as line 133-134.

line 218:

There seems to exist no test method for Small format High Performance IJ. Since the current TEC is measured with A4/Letter size test chart, we have some concern as to how this small-format product should be tested?

line 261:

We would like to request to delete the whole specification of “Wakeup”. If EPA could not delete it, a clearer and more detailed definition of “Wakeup” should be given. Since this is a “shall” specification, a product within TEC maximum value fails qualification, when it should wakeup for SNMP packets. This seems a bit unreasonable.

line 291:

As EPA has raised the problem in its discussion material on March 11, 2011, there are a number of apparently incorrect data of recovery time. Should recovery time data be provided to consumers, the reliability of the data must be ensured. Since the existing test method is not reliable enough to measure an accurate recovery time, JBMIA has proposed the following revision in the previous comments;

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.

Please consider the above proposal.

line 298:

Automatic Duplexing Requirements should be kept the same as the current Ver 1.2 specification. Those models, which have been already launched for the market, cannot comply with the proposed requirement. Blue Angel harmonizes with the current Ver 1.2. Besides the new requirement urges users to buy more expensive products, since standard duplex products will carry costlier price tags than the products with optional duplex capability.

line 300:

The requirement of duplex should not be applied to OM products, as products with roll paper are incapable of duplexing.

line 382:

- Base data for Maximum TEC Requirement should not be only those of the qualified products in the latter half of 2011 but it should be those of all qualified products under ver1.1 plus non-qualified ones. Taking the duration period of the sales of one model into consideration, the data of only the latter half 2011 cannot reflect the actual total market, but it represents rather a partial group of recent achievement of high energy-efficiency. If the requirement is based on only such “good” data, it would be unfairly stringent to the general products.
- MFD and Copier/Printer should be categorized separately, since there are apparent differences in TEC values between the two product groups.
- The proposed requirements Ver2.0 astonishingly resemble those of coming Revised Japanese Energy Conservation Law, which is based on “top-runner” methodology, i.e. different from Energy Star approach of qualifying 25% best products. Besides, the target year of JECL is 2017. If almost the same level of energy efficiency should be required for ENERGY STAR in 2013, it would be apparent that only a minimal number of products could qualify, making the number of ENERGY STAR products drastically decrease. This, we deem, is not what EPA intends.

line 506:

Since internal power supply cannot achieve 0.5W in low-load power, PSOR should not be deleted but be kept as Ver1.2.

line 547:

Since ENERGY STAR is a specification concerning energy, the whole description of 3.6 should be deleted.

If this is not accepted, we would like to propose the following;

1. Concerning 3.6.1 a complete harmonization to EU RoHS regulation is requested, including exemption specification.

<Reason>

The exemption specification of 3.6.1 does not cover all exemptions of EU RoHS. The uncovered part is impossible to rectify in the short period between Ver2.0 fix and effective date.

2. Concerning 3.6.3 the referred IEEE1680 should be replaced by EU WEEE as to the guideline of documentation of recyclable design. Also, even when EU WEEE should be referenced, the requirements should be limited only to “recycle percentage/recovery percentage.” Such requirements, as the establishment of recycle system within North America and product marking for differentiated collection (crossed-out dust bin mark), should not be adopted for ENERGY STAR requirement.

<Reason>

IEEE1680 seems to be the same as EPEAT. However, EPEAT standard for imaging equipment is not yet fixed as of today. It would be too early for ENERGY STAR Ver2.0 to refer to EPEAT. Also, there are required items as well as optional items in EPEAT. It is not clearly stated, which items are mandatory in ENERGY STAR Ver2.0. As such, the already fixed EU WEEE should be referenced as to the documentation specification.

Additionally, we have one question to EPA;

What kind of action should be taken, when the referred regulation is revised?

line 633:

Must those Energy Star products, which have been third-party qualified against Ver1.2 and have better TEC values than the coming Ver2.0 specification, be tested again by the third party with the coming altered test method?

We request that third-party qualified products against Ver1.2 should remain on ENERGY STAR Qualified Product List after March 1st for a grace period of one year.

If this should not be accepted, we request that those products, which have been CB qualified against Ver1.2 and whose data have been assured to comply with Ver2.0 by CB, may be registered on ENERGY STAR Qualified Product List without third party retesting.

As EPA would be aware, there are now many “recycle models,” which is mostly based on conventional technology, i.e. not very energy efficient. These products are important for resource saving. We would like EPA to consider ENERGY STAR qualification of such recycle products, with a bit modified energy-efficiency requirement.

END