

Comments on EPA Cover Letter July 8, 2011 and Test Method Rev. Jul-2011

JEITA Printer Committee/ Energy Saving WG

Postponement of Ver2.0 Effective Date

Request: At least one-year grace period should be given after the authorization of Ver2.0.

Reason: Since there seem a number of considerable changes in Ver2.0, we would need significant amount of time to implement corresponding changes to the product. Since Ver2.0 has no grandfathering rule, there is a risk for manufacturers, that they cannot provide ENERGY STAR qualified products in a timely manner, if the effective date is not delayed.

Elimination of allowances for secondary functional adders for OM products

Request: The secondary functional adders should not be deleted.

Reason: The more functions the products have, the more power will be consumed according to the implemented functions. If the secondary functional adders should be deleted, only products with minimal functions may be qualified. Many multi-function devices might be excluded out of Energy Star qualification.

Request: The current allowance of the secondary functional adder according to nameplate output power should be maintained.

Reason: The power consumption varies according to nameplate output power.

Proposed power allowances for primary functional adders

Request: The allowance for (A. Wired<20MHz) should be more than 0.3W, as opposed to proposed 0.1W.

Reason: Centronics uses in many cases dedicated IC IEEE1284 TRANSCEIVER, which needs 0.3W.

Request: The allowance for (D. Wireless LAN) should be 2W, as opposed to proposed 0.5W.

Reason: The power difference between with and without Wireless LAN is around 2W.

Test Method 4.1 C) Network Connections

Request: There is a case the products have network interfaces and data link interfaces. The basic rule is selecting the interface of highest priority. However, one more data link interface can be additionally selected. In such a case the accumulated allowance value for both interfaces should be applied.

Reason: For example, USB and Wireless LAN are most prevalent in home use. TEC allows testing by way of USB, even when the UUT is connected to network. There is no such description for OM products.

Test Method 8 TEST PROCEDURE FOR PRODUCTS WITH A DIGITAL FRONT END (DFE)

Request: Since this is a new test method, the limit values for qualification should be determined in the following revision after Ver2.0.

Reason: There are not enough data at present.

END