



July 29, 2011

To: [imagingequipment@energystar.gov](mailto:imagingequipment@energystar.gov)  
U.S. Environmental Protection Agency (EPA)

Subject: Kodak comments on Energy Star Imaging Equipment Version 2.0 draft test method and associated issued raised in Cover Memo, July 8, 2011

Dear Sir/Madam:

Eastman Kodak Company (Kodak) is submitting comments regarding the Energy Star Imaging Equipment Version 2.0 draft test method and associated issued raised in the associated Cover Memo issued July 8, 2011. Kodak sells printers, scanners and multifunction devices that are qualified under the current Energy Star Imaging Equipment specifications. This equipment will be affected by the proposed changes. These comments focus on issues raised in the Cover Memo.

Kodak is concerned that the proposed changes to the primary and secondary functional adder allowances are too extreme and not supported by any data made public by EPA. The current Version 1.2 Imaging Equipment Specification provides primary and secondary functional adder allowances to accommodate the power consumption in sleep mode of additional capabilities such as data and network interfaces. In Version 2.0, EPA proposes eliminating allowances for secondary functional adders, revising down the allowances for primary functional adders, and only including one primary functional adder.

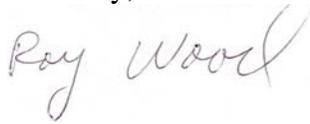
The reduction of primary functional adder allowances can be as large as 92% for equipment that has all the primary functional adders, with the total allowance going from 6 watts to 0.5 watts. Even for equipment that only uses wireless, the reduction is 83%, with the allowance going from 3 watts to 0.5 watts. EPA justifies this reduction on the basis of improvements in energy efficiency. However EPA supplies no data to support this drastic reduction. Kodak agrees that imaging equipment has improved efficiency, but does not believe that reductions of 80-90% are readily achievable.

Secondary adders draw energy in the sleep mode and can have a significant impact on the overall sleep energy consumption, so there is no clear justification for completely eliminating them. Kodak sells imaging equipment that have over 25% of the total allowance based on secondary adders. EPA justifies this reduction on the basis of improvements in energy efficiency, but there is no clear statement why all secondary allowances are eliminated, given that secondary adders continue to require energy even if they have been made more efficiency. Again, EPA supplies no data to support this drastic reduction. Kodak agrees that imaging equipment has improved efficiency, but does not believe that complete elimination of secondary adders is reasonable.

With the proposed changes, Kodak believes that EPA will be providing an advantage to equipment that contains few features that must be maintained during sleep or quickly activated from sleep. EPA has typically reduced the allowable energy in the range of 30-40% from one version to the next and Kodak believes that primary functional adder reductions that are in that range are more reasonable and consistent with past policies. A 30-40% reduction in allowances for functional adders will be effective in significantly reducing energy consumption by imaging equipment.

If you have questions or would like to discuss any of these comments, please contact myself at Roy.Wood@Kodak.com or Gerry Brown at 858-673-2845 or Gerald.M.Brown@Kodak.com.

Sincerely,

A handwritten signature in cursive script that reads "Roy Wood". The signature is written in black ink on a white background.

Roy W. Wood  
Kodak Health Safety and Environment