



May 5, 2008

Mr. Christopher Kent  
ENERGY STAR Product Development  
Office of air and radiation  
United States Environmental Protection Agency  
Washington, DC 20460

Dear Mr. Kent:

Sharp Electronics Corporation (Sharp) is pleased to have an opportunity to provide you with comments on the updated proposal for the Draft 1 version 1.1 ENERGY STAR Imaging equipment.

**1. Effective date (Line 662,674)**

EPA proposed to finalize the new specification on 1 July 2008 and with an effective date of 1 April 2009.

In the view points of "International harmonization" and "proper periods for preparation", we would like to propose to change the effective date to "1 January 2010".

a) International harmonization

Energy Star Imaging equipment is an International standard, and the criteria is utilized in other standards globally, such as Blue Angel and EU EuP directives.

Blue Angel criteria is scheduled to be revised on 1 January 2010 and it is now decided that the current International Energy Star (Tier 1) label criteria will be enforced as criteria for the EuP Directive. The label criteria enforced in April, 2007 will be in effect as European law around 2010.

The standardization of the criteria allows many manufacturers of multifunctional devices to reduce many losses caused by additional measurements and large energy-saving effect can be expected by this standardization. Therefore, we would like to propose to change the effective date to 1 January 2010", same as Blue Angel.

b) Proper periods for preparation

During the process to comply with the revision of Energy Star criteria (Tier 1), we have learned that we need at least 10 months after finalizing the specification. This includes testing equipment, changing / improving of product design, and for some models, label changes to comply with "elimination of Grandfathering". Also, since the development/life cycle of Imaging equipment is longer than 1 year, we need adequate time for the preparation to comply with new standards.

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## 2.Duplexing requirements(Line417-420)

EPA proposed that "Automatic duplexing is required as a standard feature at the time of purchase for " $\geq 40$  ipm(Color)/ 45 ipm(Monochrome)" , and "EPA has not received comments that support the need to amend the duplexing requirements. Therefore, there are no plans to modify these requirements during development of the Tier 2 specification".

The demands for single side printing/duplex side printing is the same regardless of the printing speeds. Many manufacturers have both "simplex" and "duplex" models in the line-up, and some models need to have an optional accessory to comply with duplex function.

Therefore, we propose to change "' $\geq 40$  ipm(Color)/ 45ipm(Monochrome)" to also apply "Automatic duplexing must be offered as a standard feature or optional accessory at the time of purchase."

Thank you for the opportunity to comment on the proposed specification.

Please feel free to contact me by e-mail at [Itaru.Sato@sharpsec.com](mailto:Itaru.Sato@sharpsec.com) if you have any questions.

Sincerely,

Itaru Sato  
Manager- Corporate Environmental Affairs  
Sharp Electronics Corporation