

TallyGenicom Suggestions Related to Laser Printer Duplex Requirements

Issue:

When duplex is mandatory at 45PPM+, this influences packaging, model numbers, and delivery logistics where the duplex unit is a separately packaged module that must be installed at the end user location.

Further, where products are intended for worldwide distribution, an A4 laser printer that operates at 45PPM on letter size media normally would operate at less than 45PPM on A4 media. So the mandatory duplex requirement is different for the European market as compared to the US market.

Our OEM customers for the US market have a model number assigned to a base printer with no duplex which is therefore not Qualified. They have another model number assigned to a package that includes a base printer and a duplex unit that is therefore Qualified. It is too burdensome to have two different base models where one includes the ENERGY STAR logo on the printer and one does not. Additionally, there are some 220V models sold in the US and those can not bear the logo even though the same unit delivered in the European market does bear the logo.

Suggestion:

Provide allowance for use of the logo on the printer with clear notification on the outside of the box and in the user documentation that the product is only Qualified if the duplex module is installed. If this does not provide sufficient protection for the intent of the logo because of the fact that the box and publications may disappear after installation, a notification could be added to a label on the back of the printer with notification that the product is only Qualified if the duplex unit is installed.

Also, the standard should allow sales of a pair of model numbers sold together to make up the printer and duplex unit rather than having a model name that includes both. When the duplex unit must come in a separate box, the regulatory agencies and import customs authorities require regulatory information for the individual units. Selling a model number that includes both the printer and duplex unit makes problems for customs and other regulatory work.

EPA should allow registration of a pair of model numbers to make up the duplex standard product. Alternatively, the existing system could be used with a model that contains the pair of models separated by a slash, e.g. LJ2045N/LJ2045DuplexUnit.