

September 18, 2008

Christopher Kent, EPA Product Manager
ENERGY STAR Product Specification Development
U.S. Environmental Protection Agency
Washington, DC 20460

Dear Christopher,

Thank you for the continued dialogue on the Imaging Equipment draft Tier 2 specifications. The following represents Xerox's feedback based on the FINAL DRAFT imaging equipment specification.

Separate Standards for Less Mature Technologies

Xerox supports examining a broader mix of energy related impacts (*i.e.*, embodied energy, packaging, and consumables). Xerox proposes that a working group be assembled to develop measures that align with ENERGY STAR guiding principles. Additionally, in the short term for tier 2, Xerox would like to propose a few ideas to incorporate within the specifications recommendations on how best to address less mature/new printing technologies that have other energy related benefits.

Less Mature Technology Proposal

Less mature can be defined as those technologies used in products with:

(a) ≤ 0.5 million units sold per year; **and** (b) ≤ 3 OEMs employing the technology in their product lines.

Two potential suggestions for less mature technologies under ENERGY STAR include:

- 1) Allow less mature/new technologies to certify to Tier 1 until July 1st, 2011, when they will adhere to Tier 2. This would allow technology innovation and give credit to these technologies that have other environmental benefits until a working group can develop a comprehensive strategy to address these issues.

Or

- 2) Allow less mature/new technologies an additional functional adder:
 - a. Color printers: Tier 2 (final draft) + 2 kwh/wk
 - b. Color MFPs: Tier 2 (final draft) + 3 kwh/wk

This would have the effect of encouraging technology innovation and give credit to these technologies that have other, additional environmental benefits until a working group can develop a comprehensive strategy to address these issues. Absent a different treatment for less mature technologies, Energy Star will have the deleterious effect of discouraging technologies with additional or different environmental energy related benefits, and amount to picking winners and losers in the marketplace of environmentally sound approaches to technology.

Specifications

While Xerox appreciates EPA's effort to increase TEC 1 40-82ppm speed range due to the webinar discussions, our analysis shows due to the wide speed range for this band it is significantly difficult to achieve. Most specification speed bands span 25-30ppm. Due to this large range (42ppm) and inconsistencies in drawing the specifications for TEC1, additional energy is needed.

Additionally, EPA did not address the concern on the webinar of increasing the specifications by 1.5% to account for the geographical differences in test data and specifications.

Reporting Data at 230V (line 778)

Xerox supports the decision that, for those products marketed in different markets (one of which includes a 230V market); data from testing at the 230V level should be acceptable for all markets. This would reduce testing costs for manufacturers (and still meet ENERGY STAR requirements).

Revising TEC Procedures (line 789)

EPA did not address Xerox's proposal ("the Weekend Timer Proposal") detailed below. This addition would not require a new procedure, but could help more accurately represent actual usage to the customer.

Weekend Timer Proposal:

Under the current TEC test methodology, if a product has a feature allowing for it to enter an additional reduced power mode on specified days (e.g., Saturday and Sunday), the additional power savings cannot be realized. Accordingly, Energy Star does not account for, and therefore does not encourage, such an important energy saving technology. Xerox proposes that if such a feature is enabled in a product, manufacturers be permitted to subtract the additional weekend power savings from the products' measured TEC total before

comparing it to the applicable TEC criteria - (e.g. Product final TEC = [Product Measured TEC] - [48 hours (weekend time) x [(weekday sleep mode power) - (weekend sleep mode power)]). This proposal is similar to the DFE allowance and it would not require a change in the test procedure. Further, such an allowance will encourage manufacturers to develop and implement such features thus advancing overall power reductions in future products. Proposed language for the MOU on the weekend timer is contained in an appendix to this letter.

If there are any questions regarding these comments, please feel free to contact me.

Sincerely,



Patricia Calkins
Vice President
Environment, Health & Safety

Appendix: Proposed Language for MOU

For imaging equipment with a “weekend timer” feature, the manufacturer can subtract the difference between the “sleep” power and the “weekend sleep” power for the specified time (48 hours) from the product’s total TEC result before comparing the product’s TEC to the criteria limits. In order to take advantage of this allowance, the “weekly timer” must meet the definition in Section XX and be a default setting prior to shipping.

“Weekend Timer”: Time set by the manufacture prior to shipping that determines when the product will enter and exit the “weekend sleep”. The weekend timer starts at 12:00am Saturday and ends 12:00am Monday for a cumulative 48 hours.

“Weekend Sleep”: The reduced power state that the product automatically enters into during the weekend hours. The product can still maintain network connectivity in this mode.

Example: A printer’s total TEC result is 10 kwh/wk and the product has a weekend timer feature. The sleep mode power is 20W and the weekend sleep power is 10W. $(20W - 10W) \times 48 \text{ hours} = 480 \text{ wh/wk}$, which is then subtracted from the tested TEC value: $10 \text{ kwh/wk} - 0.480 \text{ kwh/wk} = 9.52 \text{ kwh/wk}$. 9.52 kwh/wk is then compared to the TEC limit.