



Patricia Calkins
Vice President
Global Environment, Health,
Safety & Sustainability

Xerox Corporation
800 Phillips Road
MS 0105-70C
Webster, NY 14580

Patricia.calkins@xerox.com
tel 585.422-2473
fax 585.422-3416

March 30, 2011

Christopher Kent
ENERGY STAR Product Specification Development
US Environmental Protection Agency

Submitted via www at: imagingequipment@energystar.gov

Re: Comments on issues under consideration for the upcoming revision of the ENERGY STAR product specification for Imaging Equipment.

Dear Mr. Kent,

Xerox is pleased to offer the following in response to your letter of March 11, 2011 regarding the EPA/EC's plans to "reexamine and revise the ENERGY STAR specification for imaging equipment," and the accompanying queries and documents. Xerox does not believe that the time provided, 15 business days, allows for an adequate amount of time for as full and thorough a response as the 26 issues specifically raised by EPA in its "Issues for Discussion" document, nor those raised by the 11 page discussion document, would warrant. Nonetheless, we hope that these comments will be of assistance going forward.

Use of IEC 62301 (Issue 8)

IEC 62301 should not be used to measure anything beyond auto-off. The addition of another test procedure within another test procedure (TEC) creates additional complications with little benefit.

Default Settings (Issue 12)

We feel that the current requirements for default settings are sufficient. Better specifying the print driver settings might help to eliminate testing variation. We recommend keeping existing test setting requirements when defining the driver setting requirements - e.g. simplex, default mode, etc.

Lowest Power Sleep Modes (Issue 13)

Instead of declaring the lowest power sleep mode, we suggest having the testers use the declared default time to sleep to identify the lowest power sleep mode. This information is already provided. We recommend using a time based determination rather than a power based one.

Changes to the TEC Test Methods (Issue 14)

We are very leery of any potential changes to the TEC test methods. Manufacturers already need to pay for product certification and testing in EPA approved labs. Any changes to the TEC test methods would force the re-test of products that have already been tested/certified. If changes are made to the TEC test methods, provisions should be made to allow for the use of test reports that are certified under the current TEC test method.

Active 1 vs. Active 0 (Issue 15)

We would expect that a product in ready mode (Active0 time) would have a shorter recovery time than a product in sleep mode (Active1 time), so we do not believe this is an issue.

Specification of Recovery Times (Issue 17)

We believe that the current approach where manufacturers set recovery times should not be changed. The manufacturers know their customers best and will balance recovery times with knowledge of customer usage to determine the best implementation to meet TEC and customer needs.

Network Selection / Configuration (Issue 20)

We recommend leaving network selection/configuration to the manufactures' discretion.

Network Connection (Issue 21)

Specifying the state of the network connection is complex and not easy to quantify. We would recommend use of a silent/dedicated network to facilitate testing and allow for test repeatability.

Default Delay Time to Sleep (Issue 23)

We have experienced issues with the confusion of default time and maximum default time on the EPA web site. We do not believe this is a technical issue. We would request that EPA provide a better definition of default delay time. The manufacturers know their customers best and will balance default times with customer usage knowledge to determine the best implementation to meet TEC and customer needs.

Using LCAs as Part of Energy Star (Issue 26)

If Energy Star is to accomplish its congressional mandate to "reduce energy consumption, improve energy security and reduce pollution" (42 USC 6294a) it must eventually refocus from relying on a single measure of energy into a standard that recognizes that other environmental aspects, such as lifecycle energy, are equally relevant to a product's environmental impact. Xerox would recommend that those imaging products for which a manufacture submits an LCA, audited by a reputable third party, demonstrating lifecycle energy consumption equivalent to an Energy Star product also receive Energy Star status.

We hope these comments will be of use to you as you continue your work with regards to the Energy Star program.

Sincerely,

A handwritten signature in blue ink that reads "Patricia A. Calkins".

Patricia A. Calkins