

Comments on
ENERGY STAR I.E. Eligibility Criteria
Final Draft Version 2.0

Dec. 28, 2012

JBMIA Copier-MFD Technical WG

Automatic Duplexing (line 297)

- The order of Table3 and Table4 seems to be reversed.

- Proposal

Table 3 title should be “Automatic Duplexing Requirements for all **Color** TEC copiers, MFDs and Printers”.

Table 4 title should be “Automatic Duplexing Requirements for all **Monochrome** TEC copiers, MFDs and Printers.

A3 adder (line 406)

- 0.02 kWh/wk seems to be a typing error.
- Proposal

Should be corrected as 0.20 kWh/wk.

However, we cannot agree to 0.20, since we now know that Table 5 of Final Draft is not at all changed from that of Draft 2. Under this condition the qualification rate of A3 products ends up below 20%. See the next slide.

Estimated A3 qualification rate

- Using ECCJ data of A3 products, the following table shows the qualification rate corresponding to the current Table5 + 0.20 adder.

	ipm	A3 Copier	A3 Printer	All
Mono Non-MFD	<5	-	-	-
	5<s<20	67% (2/3)	-	67% (2/3)
	20<s<30	10% (1/10)	0% (0/12)	5% (1/22)
	30<s<40	33% (3/9)	19% (5/26)	23% (8/35)
		27% (6/22)	13% (5/38)	18% (11/60)

- Should EPA make no change to Table5, we would be forced to require a bigger A3 adder.

Data set reliability (Note; line 414)

- It is stated that EPA reviewed the data set and removed duplicates and data with errors, and, that EPA made some minor adjustments to the monochrome non-MFD lower speed to allow a modest increase in the products eligible for certification.
- This is a note different from that for A3 adder. So Table 5 should be amended at least for Monochrome Non-MFD.
- It has been confirmed that the QPL posted on Dec.12, 2012 has deleted many duplicates and erroneous data, which we had noted in the following slide 8. Although this has not yet fully corrected what we have pointed in our additional comments on Draft 2 on Sep. 6, 2012(slides 13) , we appreciate this as a step forward.
- Proposal
Data set should be revised in accordance with the revised QPL, then Table 5 must be adjusted to reflect this revision. We hope the remaining erroneous data on QPL will be corrected further.

Data set

- Duplicates and wrong data, which we have pointed out, remain with no correction in the data set published this time. The reliability of the data set is not different from the previous unreliable situation.
- Our estimation of the true qualification rates of monochrome non-MFD looks like as follows;

	present		corrected estimation
-20ipm	29.4%(15/52)	vs.	23.7%(9/38)
21-30ipm	36.3%(33/91)	vs.	26.6%(13/79)
31-40ipm	28.8%(21/98)	vs.	13.3%(13/98)
Total	28.8%(69/240)	vs.	20.0%(43/215)

See the slide9 concerning the existing erroneous data. The used data set is downloaded on Dec. 11, 2012 from the following URL <https://www.energystar.gov/products/specs/node/148>.

The used QPL is that of Nov. 14, 2012.

- Proposal
EPA to correct the data set, removing duplicates and wrong data, to establish a reliable revision including the change of Table 5, noted by EPA . **See the preceding slide 5.**

12/18 Webinar TEC Qualification Rates

- The presented TEC Qualification Rates in Dec. 18, 2012 Webinar seem to be based on the erroneous data set. Errors have been found particularly in low-speed area of Mono Non-MFD.
- Most of these duplicate/wrong data are now removed from QPL but are still existent in the data set.
- If corrected, the Qualification Rates in low-speed area of Mono Non-MFD would look like the figure given in the previous slide 6, which is 20% on average.

Erroneous data to be corrected

- Duplicated seven 17ipm products to be deleted.(QPL lines 924-930, 937-943)
- Duplicated six qualified 20ipm products to be deleted. (QPL lines 960-971)
- Duplicated six qualified 21ipm products to be deleted. (QPL lines 973-978, 981-986)
- The number of 29ipm qualified products is larger than that of QPL, thus six products to be deleted.
- Categorization of four 36ipm products and four 37ipm products to be changed as unqualified due to TEC data errors.
- These data are yellow-hatched in the attached data set as well as in the attached Qualified Product List.

Additional Error Information

- The following products have been found to show two different TEC values for color printer and monochrome MFD category. The same errors have been first reported for monochrome printers in the previous slide.
- Color printer:
 - one 35ipm product (QPL lines 212-213)
- Monochrome MFD:
 - six 21ipm products (QPL lines 1911-1922)
 - six 29ipm products (QPL lines 1941-1944, 1946-1951, 1953-1954)

Active0, Active1, Active2 (line 427)

- To report Active0/Active1/Active2 is understandable. However, reporting only the arithmetic average value to users would be confusing as to what this value means etc.
- Proposal
The reported Active0/Active1/Active2 should be shown as reported (without any additional calculation) in the qualified product list.
<We oppose giving a simple average of the three Active times, since this does not make any sense.>

Effective date (line 576)

- 9 months between the specification fix and effective date is too short to re-test and qualify current as well as new products.

- Proposal

The period between the specification fix and effective date should be at least 12 months.

To reduce re-testing burden, we strongly request that EPA reconsider our proposal in the next slide 12.

TEC products: Ver1.2 registration with Ver2.0 test results, and vice versa

- As EPA commented in the final draft of Ver2.0 test method, the test results of TEC products are mostly not influenced by the test condition change from Ver1.2 to Ver2.0.
- Proposal
TEC products to be registered to Ver1.2 with Ver2.0 test results, provided that CB confirms its validity.
TEC products to be registered to Ver2.0 with Ver1.2 test results, provided that CB confirms its validity.

Items to add for Consideration in Future Revision (line587) --- 1

- Definition of Data Set should be clarified.
- Since it is the basis of INTERNATIONAL ENERGY STAR criteria, at least the published data of US, EU and Japan should be referred to.

Items to add for Consideration in Future Revision (line587) --- 2

- 25% qualification rate has been applied to Tier1 (2007), Tier2(2009) and Ver2.0 (2013).
- There is a product category, such as Mono Non-MFD, whose criteria has been cut down to its limit. To apply 25% rule to such a category in the next revision would be impossible.
- We strongly request that EPA reconsider the overall application of 25% qualification rate.

END