<table>
<tr><th>No</th><th>Category</th><th>Page</th><th>Sub-clause</th><th>Line #</th><th>Original</th><th>RICOH's Comment</th><th>Proposed Change</th></tr>
<tr><td>1</td><td>DFE</td><td>4</td><td>b)</td><td>133-140</td><td>A Type 1 DFE may be sold standard with the imaging Equipmentproduct, <u>or as an optional accessory.</u>

Note: EPA has clarified the Type 1 definition to indicate that Type 1 DFEs sold with or as an option with the Imaging Equipment product at the time of purchase must meet DFE TEC requirements in order for the associated Imaging Equipment product to qualify.</td><td>1. Unclear definition of "optional accessory"
2. Assuming "optional accessory" is considered as optional DFEs listed on price list, this document is unclear whether all those optional DFEs would need to meet DFE requirement.
3. Optional DFE should not be included in the scope of this requirement as ratio of installation (of such optional DFE) is low.</td><td>1: Revert back to Section 4-a under Ver. 1.2 specification which reads:

b) Type 1 DFE: A DFE that draws its dc power from its own ac power supply (internal or external), which is separate from the power supply that powers the imaging equipment. This DFE may draw its ac power directly from a wall outlet, or it may draw it from the ac power associated with the imaging product’s internal power supply.

2: If "optional accessory" needs to be included, we propose EPA to reduce the workload by allowing the following:

A) Once a particular DFE is tested with one IE model, the result of DFE (tested) shall be utlized for other IE model which uses the same DFE (newly introduced (untested) DFE would have to be tested to verify the electricity consumption). Data shall be provided either by DFE manufacturer or IE manufacturer (no need to have CB verify).

B) Single highest electricity consumption DFE can be submitted as a representative combination.</td></tr>
<tr><td>2</td><td>TEC requirement</td><td>12</td><td>3.3.2</td><td>417</td><td>The resulting data set did not significantly alter the qualification rate using the Draft 2 proposed TEC max but <u>EPA made some minor adjustments to the monochrome non</u>
<u>MFD lower speed products</u> to allow a modest increase in the products eligible for certification.</td><td>RICOH requests EPA to update the dataset (based on the correction request dated on 9/20/2012 and 12/17/2012) and revise TEC requirement to meet its top 25% approach.
<table>
<tr><th>Brand</th><th>ModelName</th><th>Current TEC (kWh)</th><th>Revised TEC (KWh)</th></tr>
<tr><td>Gestetner</td><td>P7031nL</td><td>1.9102</td><td>2.28</td></tr>
<tr><td>Lanier</td><td>LP131nL</td><td>1.9102</td><td>2.28</td></tr>
<tr><td>Ricoh</td><td>Aficio SP4100NL</td><td>1.9102</td><td>2.28</td></tr>
<tr><td>Savin</td><td>MLP31nL</td><td>1.9102</td><td>2.28</td></tr>
<tr><td>Gestetner</td><td>P7036n</td><td>1.961508</td><td>2.45</td></tr>
<tr><td>Lanier</td><td>LP136n</td><td>1.961508</td><td>2.45</td></tr>
<tr><td>Ricoh</td><td>SP 4110N</td><td>1.961508</td><td>2.45</td></tr>
<tr><td>Savin</td><td>MLP36n</td><td>1.961508</td><td>2.45</td></tr>
<tr><td>Lanier</td><td>LP37N</td><td>1.037065</td><td>2.46</td></tr>
<tr><td>Ricoh</td><td>Aficio SP 4210N</td><td>1.037065</td><td>2.46</td></tr>
<tr><td>Ricoh</td><td>SP4210N</td><td>1.037065</td><td>2.46</td></tr>
<tr><td>Savin</td><td>MLP37N</td><td>1.037065</td><td>2.46</td></tr>
</table></td><td>Revise TEC_{REQ}</td></tr>
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