

No	Category	Page	Sub-clause	Line #	Original	RICOH's Comment	Proposed Change
1	DFE	4	b)	133-140	<p>A Type 1 DFE may be sold standard with the imaging Equipment product, <u>or as an optional accessory.</u></p> <p>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.</p>	<p>1. Unclear definition of "optional accessory"</p> <p>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.</p> <p>3. Optional DFE should not be included in the scope of this requirement as ratio of installation (of such optional DFE) is low.</p>	<p>1: Revert back to Section 4-a under Ver. 1.2 specification which reads:</p> <p>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.</p> <p>2: If "optional accessory" needs to be included, we propose EPA to reduce the workload by allowing the following:</p> <p>A) Once a particular DFE is tested with one IE model, the result of DFE (tested) shall be utilized 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).</p> <p>B) Single highest electricity consumption DFE can be submitted as a representative combination.</p>
2	Scope	6	2.2.2	219	<p>2.2.2 Products that satisfy one or more of the following conditions are not eligible for ENERGY STAR qualification under this specification:</p> <p>i. Products that are designed to operate directly on three-phase power.</p> <p>ii. Products sold with multiple DFEs.</p>	<p>The meaning of 'sold with multiple DFEs' is not clear whether it includes optional DFEs or not. This ambiguity makes industries confuse because a majority of high speed MFDs/Printers equips a standard DFE inside and offers additional Type 1 DFEs as options.</p>	<p>1: Revert back to Ver. 1.2 specification; Delete 'ii. Products sold with multiple DFEs.'</p>

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3	Duplex	9	3. 3.1	304	<p>"Achieves ENERGY STAR energy savings; product fully qualifies when packaged with (or used with) a duplex tray."</p> <p>ii. If a product is not certain to be bundled with an automatic duplex tray, the partner must make clear in their product literature, on their Web site, and in institutional sales literature that although the product meets the ENERGY STAR energy efficiency requirements, the product only fully qualifies for ENERGY STAR when bundled with or used with a duplex tray. EPA asks that partners use the following language to convey this message to customers: "Achieves ENERGY STAR energy savings; product fully qualifies when packaged with (or used with) a duplex tray."</p>	1) Manufacturer should be allowed to select method of disclosure (current language requires to disclose in product literature, website, AND institutional sales literature)	1) Change the original language to the following: If a product is not certain to be bundled with an automatic duplex tray, the partner must make clear in their product literature, on their Web site, or in institutional sales literature that although the product meets the ENERGY STAR energy efficiency requirements,
4	Recovery Time	12	3.3.3	427 —43 9	<p>「Final Draft」 EPA proposes <u>averaging Active 0, Active 1 and Active 2 times</u> and reporting their weighted arithmetic mean on the Version 2.0 QPL.</p> <p>「Comment Summary」 EPA proposes to require reporting of both recovery time (Active1 time) and Default Delay Time to Sleep for all TEC products and to provide a simple average of these three values on the Version 2.0 Qualified Product List (QPL) (<u>but having all of the data available in the expanded product data directory</u>).</p>	We think EPA should disclose Active 0, Active 1 and Active 2 time instead of their average because each of the time values are different, and does not make much sense to average them out.	Active 0 Time, Active 1 Time and Active 2 Time should be individually disclosed for each product
5	Effective Date	19	6.1.1	577	<b>Effective Date (Oct 1, 2013)</b>	RICOH supports this	
6-1	Error	11	3.3.2	405 —40 6	AdderA3 is a <b>0.02</b> kWh/wk allowance provided for A3 products with a paper 406 path width equal to or greater than 11 inches.	0.02 kWh must be a mistake.	0.02 kWh -> 0.20 kWh
6-2	Error	13	3. 4.2	470		There are 2 section "3.4.2"	Fix the error

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7	TEC requirement	12	3.3.2	417	The resulting data set did not significantly alter the qualification rate using the Draft 2 proposed TEC max but <b>EPA made some minor adjustments to the monochrome non-MFD lower speed products</b> to allow a modest increase in the products eligible for certification.	<p>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.</p> <table border="1"> <thead> <tr> <th>Brand</th> <th>ModelName</th> <th>Current TEC (kWh)</th> <th>Revised TEC (kWh)</th> </tr> </thead> <tbody> <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>Rohr</td><td>Affix 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>Rohr</td><td>SP4110N</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>Rohr</td><td>Affix SP4210N</td><td>1.037065</td><td>2.46</td></tr> <tr><td>Rohr</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> </tbody> </table>	Brand	ModelName	Current TEC (kWh)	Revised TEC (kWh)	Gestetner	P7031nL	1.9102	2.28	Lanier	LP131nL	1.9102	2.28	Rohr	Affix SP4100NL	1.9102	2.28	Savin	MLP31nL	1.9102	2.28	Gestetner	P7036n	1.961508	2.45	Lanier	LP136n	1.961508	2.45	Rohr	SP4110N	1.961508	2.45	Savin	MLP36n	1.961508	2.45	Lanier	LP37N	1.037065	2.46	Rohr	Affix SP4210N	1.037065	2.46	Rohr	SP4210N	1.037065	2.46	Savin	MLP37N	1.037065	2.46	Revise TEC <sub>REQ</sub>
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8	Decoupled Requirements for TEC Categories	20	6.1.3	636	EPA has recently learned that color MFDs—a premium product—can incorporate energy saving features that decrease their energy consumption below that for monochrome non-MFDs. EPA will therefore consider decoupling the TEC requirements in the future to recognize the highest performers among all TEC categories.	RICOH strongly supports EPA's decision.																																																					
9	Professional Products	20	6.1.3	631	viii. Professional Products (High-speed TEC Products for Printing on Heavier, Larger Paper): EPA has learned that some high-speed TEC products have additional requirements for handling larger and heavier paper. EPA will consider separating these into a separate category in a future version of the specification.	RICOH strongly supports EPA's decision.																																																					