

## Comments on Energy Star Imaging Equipment Tier 2 Specifications

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### 1. Definition of “V. Standby” on the 259th line

We suppose that the definition of “Standby” conforms to IEC62301. However, we consider that the following description; “The lowest power consumption mode which cannot be switched off (influenced) by the user...” makes our understandings of “Standby mode” for the imaging equipment products difficult and is not an adequately clear-cut definition.

Therefore, we would like to request you to delete this description and instead add the following sentence; “Possible lowest state of energy consumption which a product reaches without disconnecting the main electricity supply” as described in Note.

We believe that this description specifies a clear-cut definition of “Standby mode” and avoids possible confusion even in the case that the lowest state of energy consumption for each imaging equipment is set as either ‘Off mode’, ‘Sleep mode’, or ‘plug in Off mode’.

### 2. TEC criteria

Some say that the TEC criteria for low product speed; '1kWh' is too stringent.

We would like you to review whether the setting of 25% pass rate for this range of product speed is adequately determined or not.

### 3.Others

We would like to make a comment regarding the description on the measurement conditions, though not being related directly to the description of this Tier 2 draft, for accurate evaluation of the TEC level of products using the new standard. We appreciate your consideration.

There is a following description in the specification; “Print jobs for the test may be sent over non-network connections (e.g., USB), even on those units that are network-connected” regarding the environmental conditions of network that is required to connect to the product.

Depending on whether or not a PC is connected to the network that is connected to a product, the TEC levels in sending a job via non-network connection (e.g., USB) may differ those in sending a print job via the PC that is connected to network; the difference can be significantly large.

Therefore, we strongly recommend addition of the following description; “One or more of PCs should be connected to network” in the specification as an environmental condition of this network.

The following is the overview of the abovementioned status. As in the case illustrated below, there will occur no difference in the TEC value between the test for the left configuration and that for the right one and then we will have no concern abovementioned.

