

## Epson America Comments on: ENERGY STAR® Program Requirements for Imaging Equipment V. 1.1 Draft 1

### General

1. Set a period for “grandfathering” products qualified under v.1.0. A product shipped before the v. 1.1 effective date should be allowed to display the Energy Star logo.

If a suitable period for grandfathering is not set, products and catalogs will have to be recalled, shipped, and reworked or scrapped to either change them to meet v. 1.1 requirements or relabel them without Energy Star logos. This will be particularly energy consuming for products that display the Energy Star logo electronically.

We believe that recall and rework of existing products would unnecessarily waste a great deal of energy and environmental resources.

2. Change the v.1.1 effective date to July 1, 2010.

Our products have a two-year cycle from specification design to introduction. I do not believe this is unusual in this industry. Version 1.1 will be finalized less than a year before the effective date.

### Ink Jet Printers

3. Restore the secondary adder based on PSOR (Power Supply Output Rating).

Products that have a high capacity power supply are less power-efficient in low output conditions such as sleep mode.

4. Add view screen to the secondary functional adder allowances.

Printers with an LCD panel consume more power than similar products without them.

### Scanners

5. Assign the same secondary functional adder allowance to non-CCFL lamps as CCFL lamps.

Both types of lamps are off in sleep mode and should have identical power usage. Both should be 2 Watts.