Comments on Energy Star Program Requirements for Imaging Equipment, Version 1.1 —
Draft 1

1. Page 11: Change of marking technology reference from "heat intensive IJ" to "high performance IJ"
- We would like a specific definition of "high performance IJ," as the term is ambiguous. We believe the term should be defined not simply by performance but by specific values expressing functions or specifications.
- We would like to know the EPA's reasons for changing the reference name.

2. Page 12: TEC Table 1 and Table 2
- With respect to the inclusion of high performance IJ in these tables, we would like to know what the scope of high performance IJ is.

3. Page 15: Table 3 — OM Functional Adders
- We would like fax modem included as an Other-type 1 W secondary adder.
- The functional adder allowances are different for CCFL lamps and non-CCFL lamps. Introducing a difference between the adder allowances is inconsistent since both types of lamps are off in Sleep mode. We would like these adder allowances made the same.

4. Page 18: OM Table 8
- There is a substantial difference in Sleep levels between Table 8 and Table 1 for copiers and MFPs even though both tables concern large-format devices. We would like the eligibility criteria set to 59 W — adding 5 W to the previous criteria of 54 W, using the same logic as Table 1.
- There are too many marking technologies in this category; the eligibility criteria should be subdivided by technology.

5. Page 21: Effective date of April 1, 2009
- Given that the final specification will be announced on July 1, 2008, we would like the effective date to be extended to July 1, 2009. (The specification should go into effect one year after its announcement.)

6. Page 21: Elimination of grandfathering
- Removing labeling from products that no longer qualify will result in discarded parts since immediately changing over from the effective date involves such work as erasing label printing. We would like this issue to be left to the discretion of each partner.

7. Other issues
- When taking measurements while connected to a network, there is concern that

measurement values, with either the TEC approach or the OM approach, will vary according to how frequently computers or other devices access the printer. To ensure the reproducibility of measurement data, there should be some measurement conditions stipulated concerning network access to the printer.