

August 6, 2008

Mr. Christopher Kent  
ENERGY STAR Imaging Equipment Program Manager  
USEPA Headquarters  
Ariel Rios Building  
1200 Pennsylvania Avenue, N. W.  
Mail Code: 6202J  
Washington, DC 20460

Dear Mr. Kent:

I thank you for the opportunity to provide feedback on Draft 2 of Energy Star's Imaging Equipment Specifications, V1.1. Kodak appreciates EPA's efforts to address the concerns raised by the manufacturers, particularly in terms of the timeline and the product data on which these specifications are based.

On behalf of Kodak I would like to submit the following comments:

**Direct responses to EPA questions embedded in the document.**

1. **Line 321:** -Kodak welcomes the changes made to clarify the definition for DFEs.
2. **Line 384:** -Kodak supports excluding industrial products from the Energy star specifications. We would request a clear definition of "industrial products". The draft implies that it includes those products that are directly connected to 3 phase power, further clarification would be helpful.
3. **Line 401:** Kodak assumes that the effective date of April 1, 2009 for the EPS for Imaging equipment to meet V2.0 specs is an editorial error and that the date should be coincident with the effective date of the Imaging Equipment V1.1, consistent with the guidance provided earlier. We request that this be clarified.
4. **Line 417:** -Kodak supports maintaining the DFE requirements within the IE specification. We further support the changes suggested by ITI.
5. **Line 530:** - Adders:
  - Kodak believes that setting the lamp adder for scanners at the level for non-CCFL lamps decreases the ability of manufacturers to provide adequate response times for products with CCFL lamps. At the lower power level, it takes longer for the scanner to warm up and respond to a request, thus increasing the risk that the user will over-ride Energy Star features. This is particularly true for commercial scanner only products. We suggest that the lamp adder should be set at 2.0 Watts. If necessary, the use of the 2.0 W adder could be limited to commercial scanners in category OM7. One way of differentiating between scanners meant for

home/small office use and commercial use is the presence of automatic document feeders.

- Kodak requests a clearer explanation for why PSOR adder was limited to OM2 and OM6 products. We believe that it should be expanded to include OM5 and OM8 products.

6. **Line 573:** The criteria for OM5 products results in less than 6% of the products meeting the specifications. This is contrary to the stated goal of Energy Star to represent the top 25% performers.

#### **Kodak offers the following Future Specification Revisions**

1. **Line 772:** Additional Energy Impacts.
  - Without a clearer understanding of how the energy associated of consumables would estimated or calculated, Kodak finds it difficult to support this proposal.
2. **Line 779:** Reporting Data at 230 V.
  - Kodak supports the approach outlined in this section. We believe it would streamline the process without compromising the intent of the program.

We would appreciate the opportunity to further discuss these comments, and request a webinar on Draft 2.

Please do not hesitate to contact me if you need further clarification on the issues raised here. I look forward to working with your team on these specifications.

Sincerely,

Somadeepti. N. Chengalur  
Director, HSE Federal Policy  
Eastman Kodak Company