May 1, 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:

Kodak is a strong supporter of the Energy Star program and appreciates the opportunity to provide comments and participate in the standard development process. We have reviewed ENERGY STAR Draft 1 of V1.1 for Imaging Equipment issued by the EPA on April 10, 2008. On behalf of Kodak, I would like to submit the following comments.

Direct responses to EPA questions imbedded in the documents.

1. **Line 266**: -Kodak supports the continuation of the definitions of Standby mode that are consistent with the 2005 edition of IEC 62301
2. **Line 314**: -Kodak believes that the definition of a DFE is sufficiently clear and does not support any further change in wording.
3. **Line 520**: - Kodak would strongly urge EPA not to remove the Power Supply Output Rating adder from the operational mode approach. Kodak's understanding is that the reasons that this adder was included in Tier I are still valid:
   - It compensates for the rolloff in AC/DC conversion efficiency at low loads. The power supply losses are greater for a 3 W DC load with a 100W power supply (3% of max load) than a 10W power supply (30% of max load)
   - It is a surrogate for products speed and performance. Faster products required larger power supplies.
   - It provides a "catch all" category for other functional adders that were removed. For instance, fax, LCD screens and other functional adders were removed when the PSOR adder was introduced
4. **Line 576**: *For products listed under OM Table 5, EPA is proposing to set this Sleep level the same as OM2 (1 W) because these products are similar in function as those list under OM Table 2 only smaller.* Kodak believes that there are substantial differences between the machine architecture and use of small format photo printers (OM5) when compared to standard size Inkjet products (OM2).
   - Specifically, many OM5 products are dye sublimation (thermal transfer), while OM2 products are solely Inkjet. The power supply requirements of

dye sublimation printers are substantially higher than that of Inkjet products.
   - Further, the operational mode limits for OM5 do not meet the EPA's criteria of 25% of the market. They original standard passed only 19% of the market; the new standard passes 0% of products- essentially eliminating that category.
   - Finally, for dye sublimation printers in particular, there is no data supplied, thus making it more difficult to understand the reason to change the specifications.

5. **Line 643**: – If EPA does not intend these specifications to cover industrial and production units, there needs to be clear criteria that differentiate between these and commercial equipment. Kodak suggests the following criterion: ***Imaging equipment that is faster than 80 ppm is classified as production equipment.***

Kodak offers the following general comments on the draft proposal

1. Kodak believes that the new standard for OM7 (scanners) eliminates the high-speed commercial products and leaves only home scanners eligible to qualify as energy star. We believe that one category for scanners may not be able to cover everything from simpler USB-powered consumer scanners to highly featured/capable commercial products.
   - We request that the data be re-analyzed by speed levels and appropriate levels set for speed categories, similar to the approach followed for sleep delay times.
2. Kodak believes that EPA's method for determining the total products available on the market is underestimating the number of total units. Kodak believes that the use of Better Buys for Business is not a good assessment for the total number of models in all product categories. Despite the claims of BBB, their focus is on business products and not the total market.
3. The use of 115V data to evaluate a product for power and energy limits does not sufficiently evaluate the passing rate for 230V markets. It is common to have higher losses in the AC/DC conversion of switch mode power supplies when operating at 230V. It is highly possible that values close to the limit would fail for 230V. This would create a significantly lower passing rate for 230V markets.
4. Based on Kodak's experience, if a product meets the 230V specs, it will meet the standards at the lower voltage levels. Tests at these lower levels are therefore unnecessary. Kodak would therefore like to suggest that for those products marketed in different markets, one of which includes a 230V market, data from testing at the 230V level should be acceptable as sufficient for the multiple markets.
5. Given the number of issues with the current document, Kodak believes it is necessary include a Draft 2 level of document Revision, as was planned in the original schedule. It is important for the sustainability of the Energy Star

Imaging Equipment program to take the time to develop an appropriate standard.

Please let me know if you have any questions, or need further clarification. I look forward to working with your team on these specifications.

Sincerely,

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