ENERGY STAR Imaging Equipment Program
Tier 2 Specification Version 1.1 - DRAFT 1

Comments from RICOH Date: May 1st, 2008

Ref #	Type of Comment	Page #	Comment
1	Question	P6 V. Standby Note:	Note says that, "EPA is closely monitoring revisions to the IEC standby definition (IEC 62301:2005)", Does this mean that, when there is any revision made to IEC62301:2005, would such revision be automatically reflected in Tier 2 specification?
2	Question	P11 Duplexing, P12 TEC Table 1 & Table 2	Thre is a remark about "high performance IJ". Could you please provide a definition of "high performance IJ" which was newly introduced in the draft document?
3	Objection	P12 TEC Table 1 & Table 2	We strongly oppose to inclusion of high performance IJ in those tables (TEC Table 1 & 2 in page 12). Due to the nature of IJ marking technology, its power consumption is far less than other marking technologies such as EP due to the fact that fusing process requires much more electricity. In order to include different technologies into single category, it is important to consider functionalities. When making a comparison between IJ and EP: - image quality of IJ is inferior to that of EP - ink is absorbed into the inside of paper, making it impossible to recycle (increasing environmental impact, compared to other technologies) Therefore, we request EPA to put IJ products in different category (or subcategory) when measured by the same standard. Also we have a same comment for DP products as well.
4	Correction	P14: Table B: Maximum Default Delay Time	We believe there is a problem in the current specification (version 1.0) as well as this draft 1 about max. default delay time for copier with speed range of 31-50ipm of 30 minutes. Large-format MFD is designed as copier-based, and it would be a problematic to have different settings for max default delay time between copier and MFD. We request to change the copier's value to make it in line with MFD requirement.
5	Correction	P21 (6) Effective Date	A. Qualifying and Labeling Products under Version 1.1: The Version 1.1 specification shall commence on April 1, 2009. All products, including models originally qualified under previous imaging equipment specifications, with a date of manufacture on or after the effective date, must meet the new **Version 1.0** requirements in order to qualify for ENERGY STAR (including additional manufacturing runs of models originally qualified under previous specifications). We beliefe the red section (version 1.0) is incorrect. Please make a correction.
6	Request	P14 All large format OM products and mailing machines	Ricoh's large format products have a characteristic of high recycled contents %. The reason for this characteristic is that, there are still sizable deman for analog products, and therefore, we continue our production without major design change. Due to the recycled contents, such products is exempted from material prohibition regulations (if you dispose of parts, it would become pollution, but if recycled, disposal amount is reduced leading to less pollution). This ENERGY STAR spec revision would eliminate certain products from "Recycled" products, and this would go against CO2 reduction. There are 2 countermeasures to address this issue 1:[pushing implementation date] and 2:[revising value]. However, the option 1 needs to wait for products with design change to get recycled, which would be too long. Therefore, we request EPA to revise the value to 2W (instead of 1W)

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7	Request	P16 PSOR	The Note states that, PS size is not a function that delivers functionality to imaging products. However, in order to deliver more functionalities to imaging products, it causes increase in eletrcical current = increase in PS output rating. This increase in PS rating will cause a decrease in efficiency during low-load (during energy-saving modes), which ultimately results in increase in energy consumption. The size of PS is directly related to delivery of functionalities for imaging products, and elimination of PSOR from secondary adder would be prohibitive for imaging products' functional improvements. At the same time, this elimination would create an unfair advantage to those imaging products with low-functionalities. Therefore, we strongly oppose to the elimination of PSOR from secondary adder list. If EPA is determined to eliminate PSOR from the list, then it is necessary to add: - additional wattage allowance based on printing speed - additional wattage allowance based on image processing capability - additional wattage allowance for other criteria which enables higher functionalities to the Table 3. We would like to ask EPA to provide rationale for - Background information for why ENERGY STAR Tier 1 spec included PSOR - Background informaiton for why ENERGY STAR Tier 2 spec elininated PSOR We would like to include this issue to be discussed during the stakeholder meeting (11:00AM Discussion of proposed changes to OM)
8	Request	OPS Product Registration	Under existing OPS, there are required fields which is not related to ENERGY STAR specification. In order to reduce the administrative work needed for data entry, we request EPA to review all the fields, and re-classify non-related items as "optional".