

**Comments on Draft Final
Ricoh Corporation
09/18/2008**

Issue: Additional Testing Requirement

Section 4. Test Procedures

A. Number of Units Required for Test: Testing shall be conducted by the manufacturer or its authorized representative on a single unit of a model.

a. For products outlined in Section 2, Table 1 of this specification, if the initial unit tested has TEC test results that meet the eligibility criteria but fall within 10% of the criteria level, one additional unit of the same model must also be tested. Manufacturers shall report values for both units. To qualify as ENERGY STAR, both units must meet the ENERGY STAR specification.

b. For products outlined in Section 2, Table 2 of this specification, if the initial unit tested has OM test results that meet the eligibility criteria but fall within 15% of the criteria level in any of the specified operating modes for that product type, then two more units shall be tested.

To qualify as ENERGY STAR, all three units must meet the ENERGY STAR specification.

RICOH's Comment:

We would like EPA to consider eliminating this requirement for those products registered prior to June 30, 2009 (ie qualified under tier 1 spec) with initial test result falls within 10% / 15% of the criteria level. In other words, even if those tier-1 qualified products' test results fall within defined % in this section, those products will be qualified without submitting additional unit testing data. Of course, if a product does not meet the new specification (tier 2), this product would be consider non-qualified (no grandfathering).

Rationale:

We are concerned about unreasonably increased testing workload, especially with the elimination of grandfathering. Especially for those products already registered for current ENERGY STAR specification (tier 1), under the existing draft specification, we would need to conduct multiple re-testing if the original test result (against tier 1) falls within 10/15% of tier 2 spec. In this case, manufacturers would need to find the products and conduct another testings just to maintain ENERGY STAR qualification. Rather than going with this venue, we propose a temporary measure to eliminate the re-testing requirement in order to efficiently determine product's qualification without jeopardizing the integrity of ENERGY STAR Imaging Equipment program. Again, if those products do not meet the Tier 2 specification, such product will not be qualified under new specification.

If you have any question or require further explanation, please feel free to contact me at any time.

Again, thank you very much for your continued support.