



Via e-mail

August 5, 2008

Mr. Christopher Kent
United States Environmental Protection Agency
ENERGY STAR Product Development
Office of Air and Radiation
Washington D.C. 20460

Dear Mr.Kent:

Thank you for the opportunity to comment on the updated proposal for the ENERGY STAR program requirements for Imaging equipment Draft 2 Version 1.1 specification(Tier 2). The following comments are on behalf of Sharp Electronic Corporation of Mahwah, New Jersey.

(1) The difference between TEC2 and TEC4 is too small.

As shown in the Attachment (1), the difference between TEC2 (color copiers) and TEC4 (color multifunctional devices) is very small.

In general, the power consumption of multifunction device is bigger than its of single function copiers. According to this fact, Tier 1 indicated that the difference between TEC2 and TEC4 was from 3 to 7.2 (kwh). But in the new Draft 2 indicates that the difference between them is from 0.7 to 2.2 (kwh). We think these differences are too small, so we would really like to ask EPA to review them.

(2) TEC1 criteria at around 40ipm, TEC3 criteria at around 30ipm and TEC4 criteria at around 26ipm are strict.

The criteria in the above 3 areas are strict, so we would like EPA to review them. These areas have a large number of models and have profound effects, so we would like EPA to divide the areas smaller and review them rigorously. [Attachment (2)]

(3) "Purchase of high efficiency product will be cost effective" [P. 13 in DRAFT 2 - ENERGY STAR Program Requirements for Imaging Equipment (Version 1.1)]

Sharp support the concept of this EPA proposal is correct in general.

However, this does not apply to a case of adoption of IH fusing technology etc.

IH fusing technology has large environment loads during its development and manufacturing, but its energy-saving performance is high. The increase in the strictness of energy-saving criteria resulted in inconsistencies. A little more consideration of the balance of environment loads is needed for setting criteria.

(4) "The timing of the criteria revision is too early."

The criteria is scheduled to revise in once every two years in the past.

Judging from our product development and life cycle, we need about 2 years to develop new products. Even if we go ahead with a development in accordance with our predicted targets, the criteria get strict when the development is completed, resulting in chasing between development design and criteria revision. Therefore, we would like EPA to extend the intervals between the criteria revisions.



(5) Review of 25% rule

As early stage of Energy Star program, Imaging equipment industry have making efforts to reduce energy consumption of the product. Imaging equipment industry have been keeping the position of "Top runner" in energy efficiency field in whole electronics industry.

In comparison with 2000, the current energy-saving performance is improved to use about 1/4 of energy consumption in 2000.

The accumulation of technologies for a long term results in the high level of the energy-saving performance of our industry.

In our overall high-level industry, even if, for example, revising the target of the criteria from 25% to 50% which is the twofold increase of the current target, although slight difference is found, we think that all compliant products have the excellent energy-saving performance.

Therefore, we would like to strongly propose EPA to review this 25% target to be about 50%.

(6) Harmonization of International Standards

It is now decided that the current International Energy Star (Tier 1) label criteria will be enforced as criteria for EuP Directive. The label criteria enforced in April, 2007 will be in effect as European law in around 2010. In addition, Blue Angel will be also affected by International Energy Star. We recognize that Energy Star is currently the most influential global standard and the prestigious criteria.

We would like to ask EPA to consider the above situation and make careful judgments.

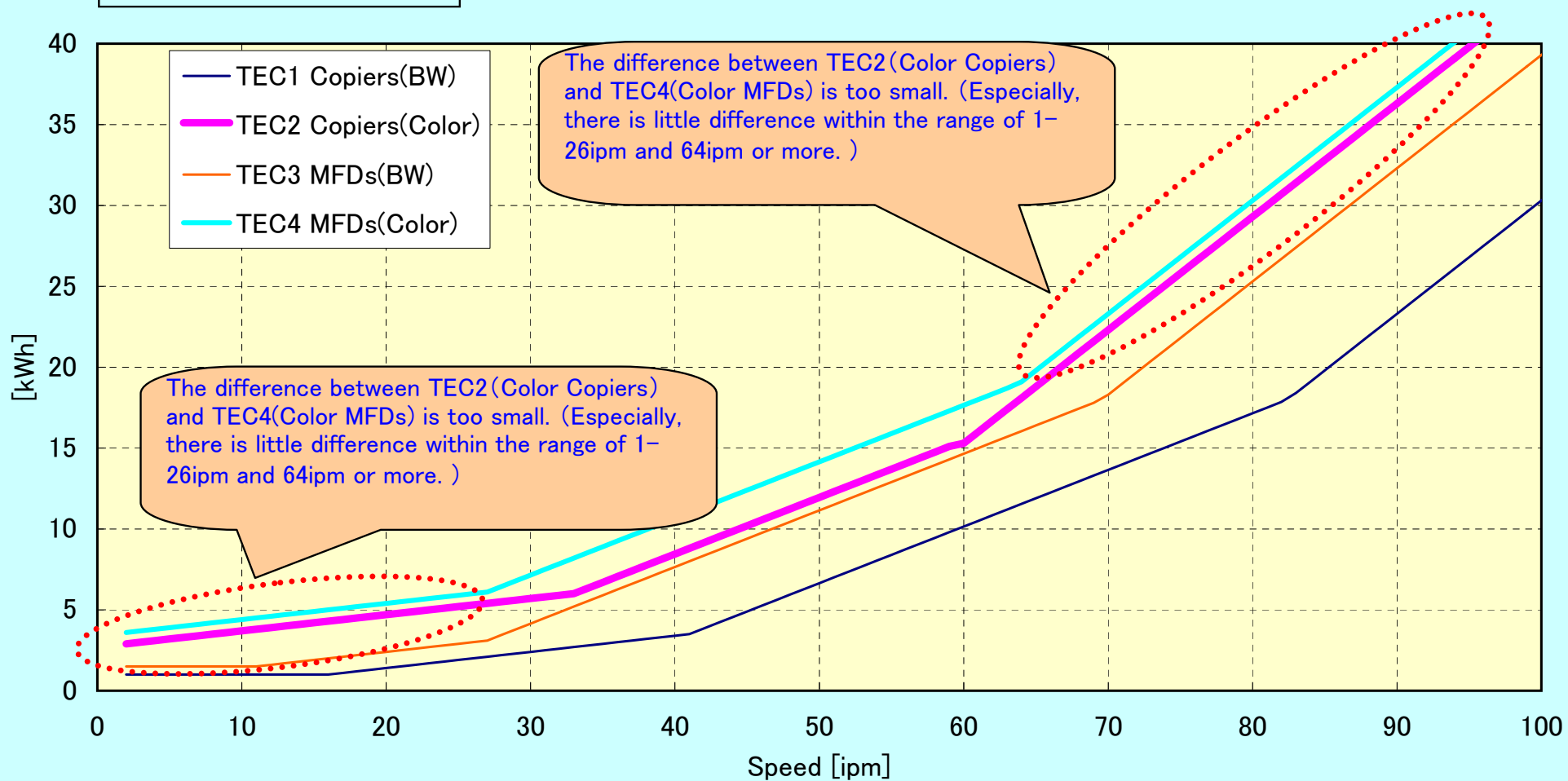
If you have any question, please feel free to contact me by e-mail at Itaru.sato@shapusa.com.

Sincerely,

Itaru Sato
Manager Corporate Environmental Affairs
Sharp Electronics Corporation

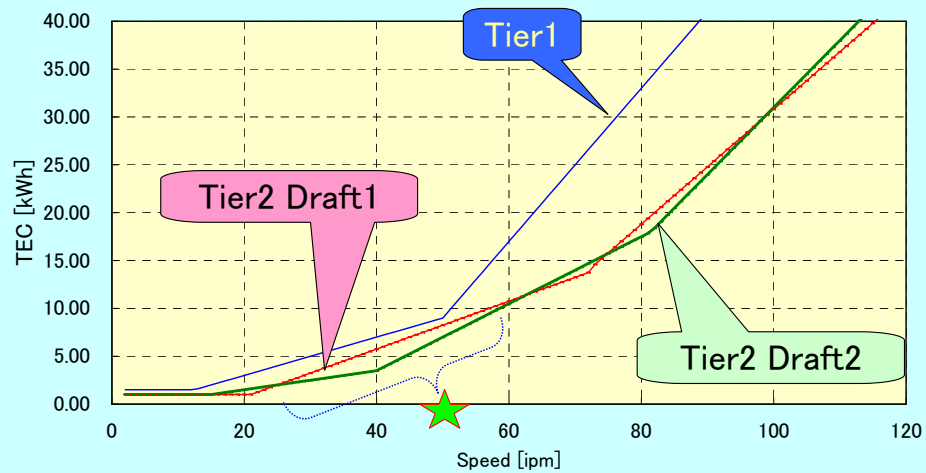
Attachment ①

Tier2 (Draft2 Ver1.1)

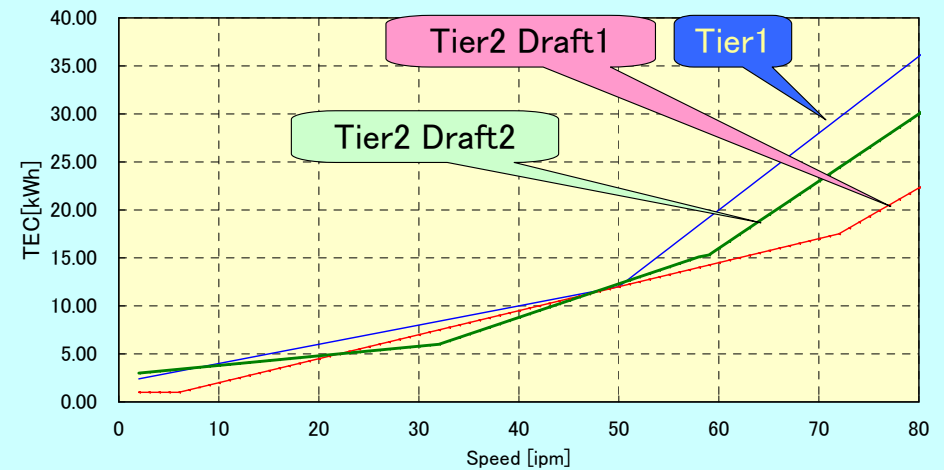


Attachment②

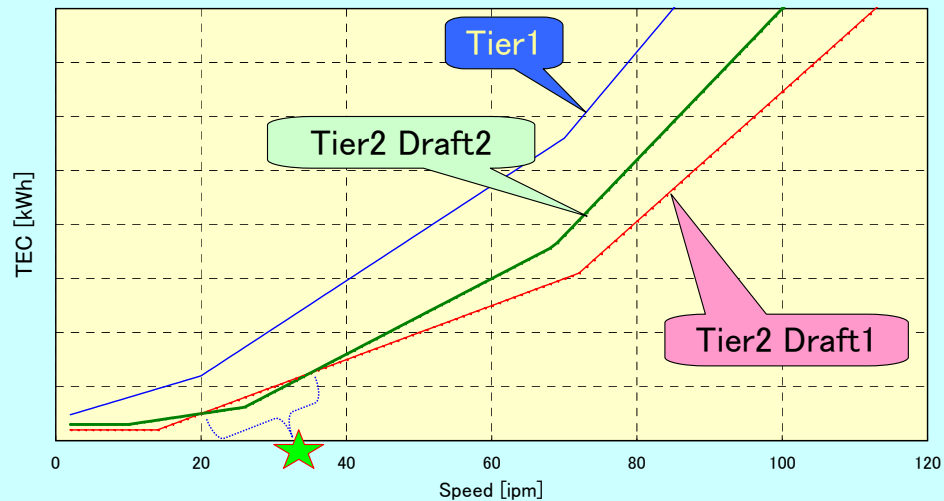
TEC1(Copiers Mono)



TEC2(Copiers Mono)



TEC3(MFDs Color)



TEC4(MFDs Color)

