

17 December 2012

Mr. Chris Kent  
U.S. Environmental Agency  
1300 Pennsylvania Avenue N.W.  
Washington, DC 20004

Re: ENERGY STAR® Imaging Equipment v2.0 final draft

Dear Mr. Kent:

On behalf of the leading information and communications technology (ICT) companies, thank you for continuing to engage in dialogues with us with respect to the ENERGY STAR Imaging Equipment v2.0 draft specification.

We have already commented on various technical aspects of the draft specification, and while we appreciate the EPA's review of our data, correction of some errors, and subsequent incorporation of an A3 adder, there are still problematic elements with the data that must be resolved prior to finalization of the specification. As previously described, if these errors are not corrected, it will have a significant impact on the ability and willingness of manufacturers to seek to qualify new imaging equipment under ENERGY STAR.

For a complete description of our concerns, please see the enclosed document titled, "JBMIA + JEITA Comments on Ver2.0 Final Draft 2012.12.17". Please note the following changes in particular:

- Power Point Slide #3 – There appears to be a typo in the A3 adder number (0.02 instead of 0.2 kWh), however, 0.2 kWh is not acceptable since the data set was not corrected and is therefore erroneous. We recommend correction of the A3 printer adder number.
- Power Point Slide #4 – Illustrates that with the current assumptions, less than 20% of the market will qualify.
- Power Point Slide #5 - We have confirmed that EPA has modified some aspects of the qualified products list (QPL) as posted on Dec.12, 2012, but we recommend that the EPA modify the dataset as well. Additionally, the QPL still contains erroneous data.

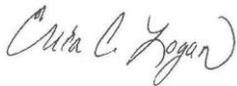
- Power Point Slide #6 – The reported Active0/Active1/Active2 should be shown as reported in the QPL. Averaging is not recommended.
- Power Point Slides #8 and #9 – Describes the remaining errors in the data set and QPL.

Lastly, ITI additionally recommends the following:

- Addition of A3 and A4 definitions
- Updating the ENERGY Star database to track Letter/A3 vs Ledger/A4 models. To meet federal procurement demands, these updates must be done at least 3-months prior to the effective date, and the V1.2 listing needs to remain active for 6 months after the effective V2.0 date.

We would welcome the opportunity to meet with the EPA in-person to review our concerns and recommendations in greater detail.

Sincerely,



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