

Epson comments and requests for clarification regarding:

Energy Star Product Specification for Imaging Equipment
Eligibility Criteria
Draft 1 Version 2.0

1) Request for clarification:

Page 14. L442, L460 and L463:

Under “3.4.4 Sleep Mode Power Consumption” “Interfaces that are present and used during the test, including any fax interface...”

This makes it appear that if a fax interface is included on a product the fax interface must be selected for use as a functional adder. If the device has several interfaces, using the fax interface may not be the most realistic choice for defining power usage in sleep mode.

Please make it clear that the interfaces used as functional adders are chosen by the manufacturer. Not that one of the interfaces used as a functional adder must be fax if it is present.

2) Request for clarification:

Page 5. L195:

Under “14) Product Family” definition “c) Input voltage and frequency” is included in the list of acceptable family variations.

Our understanding is that products with different input voltages are generally sold in countries other than the US and Canada. With this in mind, can we use the third-party verification system to register product families whose members will be sold in EU or Asia as well as the US? The Asian and EU products would use different input voltages. We assume that if this is correct, non-US products will still not be listed on the US Energy Star Site.

3) Request to increase the Pmax-base of impact printers

Page 15, L471:

Table 6: Sleep Mode Power Allowance for Base Marking Engine.

We suggest increasing the Pmax_base for Large- and Standard-size impact printers. Using the current Energy Star product list we calculated the percentage of products that would qualify under version 2.0 given the proposed Pmax_base.

12.8 percent of large format impact printers will qualify. While almost exactly 25 percent of standard size printers qualify. Since a technological breakthrough to save energy will probably not occur in this mature technology we suggest raising the Pmax_base values.

(See attached spreadsheet: Draft 1 SEC support docs.xls.)

4) Request for clarification:

Page 20, L633-L637

“Effective Date” When will third-party certification bodies start accepting test results and verifying them according to Version 2.0 standards? Will it be before the “take effect” date or exactly on March 1, 2013?

5) Request to use version 1.2 optional requirements for Automatic duplexing speed requirement.

Page 9, L297-L298

We suggest that the speed requirements for Automatic Duplexing be broken into color and non-color TEC devices as was specified in Version 1.2 options: Color – $s > 24$ and Monochrome – $s > 19$.