

Epson America comments on:

**ENERGY STAR® Program Requirements  
Product Specification for Imaging Equipment**

**Test Method for Determining  
Imaging Equipment Energy Use  
Rev. Jul-2011**

**Comment 1:**

**Based on this section, Page 5, Line 98**

**“4.1. C) Network Connections: Products that are capable of being network-connected as-shipped shall be 98 connected to a network.**

*2) The type of network connection depends on the characteristics of the UUT and shall be the topmost available connection in the appropriate column of Table 6 –”*

**<Current default interface behavior>**

Usually, in a printer’s factory settings, automatic cable connection detection is active. When a cable is connected, the interface goes into an active state.

In case of Wi-Fi, the device searches and finds an access point and users decide whether Wi-Fi connects to an access point or not.

**<Advantage of mandating data connection order of preference>**

It is possible to clarify the manufacturer's recommendation for power saving settings.

**<Disadvantage>**

It may be necessary to disable automatic cable connection detection. This would result in a negative user experience

**Comment 2:**

**Based on Page 5, Line 100 and Page 6, Line 105**

**<Clarification needed>**

Do the words “**connect**” and “**active**” mean the same thing in the two examples? If the two words have different meanings, please let us know the differences are.

Page 5, Line.100: “Products shall be **connected** to only one network or data connection for the duration of the test.”

Page 6, Line.105: “Also, since only one interface shall now be **active** during the test,”

**Comment 3:**

**Based on Page 7, Line 112**

**4.2 Configuration for Fax Machines**

A) All fax machines and products incorporating fax machines that connect to a telephone line shall be connected to a telephone line during the test.

**<Clarification needed>** If a UUT is connected to a telephone line and is in a fax receivable state during the test, a functional adder should be allowed.

(Our products data show about 0.15W increase)

**Comment 4:**

**Based on table on Page 6, Line 104**

**“Table 6: Network or Data Connections for Use in Test”**

<Comment> Ethernet is mainly used for business applications and USB is mainly used for consumer applications.

Considering this, we propose dividing the order of data connection preference for OM products into two groups; Consumer use and business use:

<Suggestion>

[For business applications]

1. Ethernet - 1 GB/s
2. Ethernet - 100 Mb/s
3. USB 3.x
4. USB 2.x
5. USB 1.x
6. Wi-Fi

[For Consumer applications]

1. USB 3.x
2. USB 2.x
3. USB 1.x
4. Wi-Fi
5. Ethernet - 1 GB/s
6. Ethernet - 100 Mb/s

**Comment 5:**

**Based on table on Page 6, Line 105**

**“Also, since only one interface shall now be active during the test, ENERGY STAR is considering eliminating allowances for functional adders such as data and network connections. Furthermore, ENERGY STAR is also considering eliminating allowances for other functional adders such as hard disk drives and memory. ENERGY STAR welcomes comments on this proposal, and/or updated allowance levels where the adders are to be retained. For a list of updated adder allowances being proposed by EPA, please see the letter to stakeholders distributed along with this draft test method, dated July 8, 2011”**

<Comment> Current standards do not consider the power consumption difference between UTTs with different functions. Compared to printers, MFDs have more functions and which makes the requirements for MFDs more stringent than the requirements for printers.

IJ-printers and IJ-MFDs have about 1W difference in sleep mode

<Suggestion> There is a large difference between printers and MFDs because of the additional scan function. Therefore, the functional adder for scanners (currently 0.5W) should not be removed.

**Comment 6:**

**General**

<Comment> Since there are a large number of changes in Version 2.0, we would need a significant amount of time to implement corresponding changes to the product.

<Suggestion> At least one-year grace period should be given manufacturers to give them a chance to implement the necessary changes.

**Comment 7:**

**General**

<Comment> In many cases Centronics interfaces use a dedicated IC IEEE1284 TRANSCEIVER, which requires 0.3W.

<Suggestion> Change the functional adder for (A. Wired<20MHz) from 0.1W to 0.3W.

**Comment 8:**

**General**

<Comment> USB and Wireless LANs are most prevalent in home use. TEC allows testing by USB, even when the UUT is connected to network. There is no such option for OM products.

<Suggestion> Some products have network interfaces and data link interfaces. The basic rule is selecting the highest priority interface. However, more than one interface can be active. In such a case the accumulated allowance value for both interfaces should be applied.