

ENERGY STAR Imaging Equipment version 2.0 Draft 2 Test Method – Comments from EU

We provide in the following comments from the European Commission to the Draft 2 Test Method for Imaging Equipment Version 2.0. We are happy to see that EPA agrees in many of our previously submitted comments and has adjusted the draft correspondingly. There are though still comments, which we believe are relevant to consider when revising the draft.

We have the following new comments to the current draft.

Comments to the draft test method

Line 24 – Operating voltage/frequency: The methodology document includes the statement, “(e.g., 230 volts (V), 60 hertz (Hz) 24 in North America)”. It is unclear whether or not 115 volts should be used here instead of 230 volts.

Line 69 – Measurement of low-voltage dc source: It seems unclear to us at which state the loaded dc source power will be measured. It is only explained how the unloaded source power will be measured.

Line 109 – Product speeds for qualification and for testing: We think the possibility of having a different product speed for qualification and for testing makes an uneven playing field for the manufacturers. A manufacturer could choose to design the product with high speed low quality mode for getting high power allowance. The as-shipped mode could be a higher quality and lower speed. The result would be a high power allowance and no customer complaints because the customer would never use the high speed low quality mode. We recommend that the product speeds for qualification and for testing are the same.

Line 123 – Eliminating allowances for functional adders: The previous allowances for additional network connections beyond the primary connection provided significant extra power allowance for OM products which was not warranted in most cases. It is suggested that only allowances for the initial connection are provided.

Line 259 – Auto-power down to off: The IEEE 1680.2 draft standard includes a criterion addressing auto-power down to off mode for all covered imaging products. The draft ENERGY STAR test procedure only requires that auto-off functionality be measured for Copiers, Digital Duplicators without Print Capability, and MFDs without Print Capability. Could this reporting be extended to Printers, Fax Machines, Digital Duplicators with Print Capability, and MFDs with Print Capability to ensure that ENERGY STAR is in line with the IEEE 1680.2 standard?