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February 29th, 2012

Environmental Protection Agency
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Fujitsu Computer Products of America Requests & Questions for ENERGY STAR Eligibility Criteria, Draft1 Version 2.0

Fujitsu basically agrees to the Eligibility Criteria Draft 1 Version 2.0 which defines the standard for promoting energy efficiency. However, there are some parts of the proposed draft specification that we would like EPA to clarify. We would be very appreciative if EPA can reply to our recommendations and questions.

1. REQUESTS

1) Sleep Mode Power Consumption Table 7 (Line 474)

It is not clear if the Adder Type "Scanner" is being applied to a Scanner (as a single product) or only to Product Types other than the Scanner. Please specify that the Scanner (as a single product) is exempt from this criteria because employing a light source is standard for the Scanner (as a single product).

2) Operational Mode Default Delay Time (Line 419, Section 3.4.3)

This concerns Line 422 which states, "The maximum machine delay time shall be less than or equal to 4 hours."

Fujitsu understands that the user can adjust the default delay time within the permitted maximum machine delay time, but this was not specified. Since it was specified in Version 1.1, we recommend the EPA to add the following statement to 3.4.3.

"The default-delay-time settings provided in Tables 5 may be user adjustable" to line 422, (to be consistent with V1.1 specification).

* For your reference (from Version 1.1):

Default Delay Time Requirements: To qualify for ENERGY STAR, OM products must meet the default-delay time settings provided in Tables A through C below for each product type, enabled upon product shipment. In addition, all OM products must be shipped with a maximum machine delay time not in excess of four hours, which is only adjustable by the manufacturer. This maximum machine delay time cannot be influenced by the user and typically cannot be modified without internal, invasive product manipulation. The default-delay-time settings provided in Tables A through C may be user adjustable.

Additional Questions:

1. Why is user adjustable time no longer an option?
2. What is EPA definition of manufacturer?
3. Can a Service Person be considered as manufacturer or manufacturer's representative for this?

3) Standby (from Line 90/ from Line 532)

Fujitsu would recommend the EPA recognize that, as a condition for entering Standby mode, when connected to a PC via USB the scanner will enter Standby Mode in conjunction with PC shut-down. For image-processing devices, it is common to have this function for entering Standby Mode in conjunction with the connected PC's power status; therefore, we believe this meets the concept behind Energy Star.

2. QUESTIONS

1) Sleep Mode Power Consumption Table 7 (Line 439, Section 3.4.4)

The following conditions have been stated for the calculation of Sleep Mode Power Consumption.

459 • *AdderINTERFACE* is the power allowance for the interface functional adders
460 used during the test, including any fax capability and as selected by the
461 manufacturer from Table 7, in watts;
462 • *n* is the number of allowances claimed for interface functional adders used
463 during the test, including any fax capability and is less than or equal to 2

Additional Questions:

1. What about the *Adder INTERFACE* for the following two cases?

Case-1: A scanner with both USB 3.0 and wireless LAN

There is a state where the scanner can return from the Sleep Mode to Ready State via both interfaces. When testing in this state, can we add the "Functional Adder Allowance (Table 7)" of these two interfaces to the calculation?

AdderINTERFACE = 0.5W (USB3.0) + 2.0W (Wireless)

Case-2: A scanner with both USB 2.0 and SCSI

There is a state where the scanner can return from the Sleep Mode to Ready State via only one interface. When testing in this state, can we add the "Functional Adder Allowance (Table 7)" of these two interfaces to the calculation?

AdderINTERFACE = 0.4W (USB2.0) + 0.2W (Parallel)

2) Standby Power Consumption (Line 524, Section 3.4.5)

Additional Questions:

1. Is there any standard for the maximum waiting time for entering Standby Mode automatically?

We are asking this because our third party certified body testing document states that the waiting time for entering Standby Mode should be within 4 hours. Since this differs from the old Energy Star criteria, we would like EPA to confirm.

2. Can EPA provide further clarification for the above paragraph(*AdderInterface* 459-463)

3) Toxicity and Recyclability Requirements (Line 547, Section 3.6.2.)

Additional Question:

Fujitsu does not understand the basic criteria for "ease of disassembly and recyclability". We don't understand why Section 3.6 is included on this specification because this specification describes the energy efficiency or power consumption of a device.

1. Can EPA clarify the above requirements?

Yours Sincerely,

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