

To whom it may concern,

Oki Data and our parent company wish to submit the following comments on the proposed changes in the July 6, 2011 Draft Version 1.1 of "Test Method for Determining Imaging Equipment Energy Use".

(1) [Request]

Give us at least one year between the finalization of the revised standard and its implementation.

[Reason]

To meet the very strict proposed requirements, we will need to conduct a technical study first, followed by new product design. This will take at least one year, and it is likely that we cannot do this in time for the scheduled implementation start date. Because the Energy Star program does not grandfather existing equipment, the given time frame would cause many Ver1.2-compliant products to become noncompliant, which will likely create a lot of confusion for consumers.

(2) [Request]

We propose that the *Functional Adder* value for IEEE1284 be eased to at least "0.2W".

[Reason]

The IEEE1284 interface is an obsolete, *conventional* one and using an IEEE1284 TRANSCEIVER (74LVC161284), an exclusive IC, in the circuit is a common practice. In the case of the said circuitry, the actual measured power consumption for an IEEE1284 interface circuit is about 0.24W. So it is fair to say that the proposed value of 0.1W (*Primary Adder Category being A. Wired < 20 MHz in Table 1. Proposed Sleep Allowance*) for *primary Functional Adders* is unreasonably stringent.

(3) [Request]

The permissible value as much as Power Supply permitted under *Secondary Functional Adder* should be allowed to remain unchanged and not removed (as is being proposed for all *Secondary Functional Adders*).

[Reason]

It is considered very logical and practical that permissible values be increased according to the power supply's rated output; thus, we propose that at least the permissible value for a Power Supply be allowed to remain unchanged.

(4) [Request]

We propose that in the OM testing process, in particular, those models that do not require preconditioning time be exempted from the proposed mandatory two-hour preconditioning time.

[Reason]

This will shorten the evaluation time for some models and therefore reduce the cost of conducting the test in a third-party lab.

(5) [Request]

We would like to check our understanding of what the EPA intends to do concerning the request for DFE data.

The proposed draft test method newly requires measurement data pertaining to energy consumed by the

DFE (in both READY and SLEEP modes). It also states that the EPA will consider the results and reflect outcome in a revision of the ENERGY STAR Program Requirements for Imaging Equipment (i.e. the specification). What we need verification on is whether the outcome of the measurements will be reflected in version 2.0 of the specification or whether it will be introduced in a later specification (such as v2.1 or v3.0).

Best Regards,
Bob.

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