

Category	Page	Sub-clause	Line #	Comment	Proposed Change
Technical	8	3.2.4	261	We fully understand that testing should be conducted under the 'common network traffic'. However both 'common network traffic' and 'wake' are not defined neither in Test Method document nor in Definitions of this specification, which is indispensable to verify this criteria	Sub-clause 3.2.4 should be deleted, or relevant definitions should be clarified.
Technical	8	3.3	290	Recovery time data is one of the indicators that users use to determine product usability for the purpose of comparison, thus needs to be disclosed. 'Active1' time derived from TEC measurement can be a fair indicator to compare recovery time of the products	Active1 time should be disclosed at the ENERGY STAR Qualified Product List on the EPA web.
Technical	8	3.3.1	294	Differently from MFDs, demands for low speed and low cost monochrome printers without automatic duplexing function remain persistently in the market mainly for special use such as ledger sheets. Consequently duplexing requirement for Monochrome Printers would narrow the range of choice for printers, which does not serve the interest of customers. Automatic duplexing requirements for monochrome Printers should not be changed from Ver. 1.2.	Duplexing Requirement for Monochrome Printers should be added in table 3 as follows: Monochrome Product Speed: Duplexing Requirement ≤ 24 ipm: N/A 25 – 44 ipm: Automatic duplexing must be offered as a standard feature or optional accessory at the time of purchase. ≥ 45 ipm: Automatic duplexing is required as a standard feature at the time of purchase
Technical	11	3.3.2	382	According to dataset provided by EPA with Ver2.0 draft 1, qualified monochrome TEC products are offered only by a single manufacture. It does not meet the draft 'ENERGY STAR® Products Program Strategic Vision and Guiding Principles'. This document set the following requirement as one of the six principles: '4. Energy-efficiency can be achieved through one or more technologies such that qualifying products are broadly available and offered by more than one manufacturer'. With the above considered, the specification for the monochrome printers ranged from 38-44 ipm should be attainable at least by two manufactures. By slightly modifying the TEC slope of this speed range, products from more than one manufacturer can meet the TEC requirement.	Maximum TEC Requirement for Monochrome in Table 4 should be changed as follows: $S \leq 7 \quad 0.5$ $7 < S \leq 45 \quad (S * 0.74) - 0.03$ $45 < S \leq 74 \quad (S * 0.20) - 5.7$ $S > 74 \quad (S * 0.7) - 42.7$

Technical	11	3.3.2	382	<p>According to dataset provided by EPA with Ver2.0 draft 1, qualified color TEC products with 90 ipm or more are offered by only a single manufacture. It does not meet the draft 'ENERGY STAR® Products Program Strategic Vision and Guiding Principles'. This document set the following requirement as one of the six principles; '4. Energy-efficiency can be achieved through one or more technologies such that qualifying products are broadly available and offered by more than one manufacturer.'</p> <p>With the above considered, the specification for the monochrome printers ranged 90 ipm or more should be attainable at least by two manufactures. By slightly modifying the TEC slope of this speed range, products from more than one manufacturer can meet the TEC requirement.</p> <p>For your information, TEC data of the following Ricoh's color MFD data of 90 ipm was missing in your dataset. Ricoh Pro C901 with C-81 ipm: 90, TEC: 26.063KWh Ricoh Pro C901 with E-41 ipm: 90, TEC: 26.063KWh</p>	<p>Maximum TEC Requirement for Color in Table 4 should be changed as follows: $S \leq 45 (S * 0.07) + 1.4$ $45 < S \leq 70 (S * 0.2) - 0.45$ $S > 70 (S * 0.85) - 50.15$</p>
Technical	18	3.6	547	<p>Clear requirements and definitions for toxicity and recyclability are already provided by EPEAT and EU Eco-label that is referring ENERGY STAR requirement. Clear definition of toxicity and recyclability is indispensable for the verification of this criteria.</p>	<p>3.6 should be deleted or clear definition of toxicity and recyclability should be added. We also support the comment submitted by Information Technology Industry Council (ITI) on this particular section (3.6)</p>
Technical	20	6.1.1	638	<p>We fully understand that a challenging requirement such as Top 25% line can encourage the products development with higher energy efficiency. However, a lot of time have to be spent to re-design products because Ver. 2.0 requirements are stringent. (about 18 months is necessary in case of major design change) With the above considered, we propose that products certified by CB in Ver. 1.2 should be grandfathered on Qualified Products List for six months after the effective date.</p>	<p>The following language should be added in 6.1.1 Products certified by CB with Ver. 1.2 can remain in Qualified Products List for six months after the effective date of Version 2.0.</p>
General	N/A	N/A	N/A	<p>We are unable to find any definition for the product speed (referred to as "s") in the specification document. Since the "s" determines the TECmax value for qualification, it is important from the standpoint of program integrity to have a common definition of product speed. We are aware that product speed is described in the section 6.1 of test method, however, we recommend including definition within specification document.</p>	<p>Include the definition of product speed. It may be necessary to include a language referring to specific measurement methodology commonly used in the industry. Also "s" should be a default setting so that purchaser can reference TEC values to compare products' default state.</p>

General	N/A	N/A	N/A	We understand that the "top 25% line" was determined based upon the excel document, "ENERGY STAR Imaging Equipment Draft 1 Version 2.0 Dataset". However, by comparing between this data and Qualified Product List (latest: 2-16-2012), number does not seem to add up (we are aware that there are over 500 non-qualified products included). In order to ensure the data validity, we would like ENERGY STAR program to provide additional data for which Draft 1 was formulated.	Provide detailed evaluation background (which data was utilized, how data was obtained, etc.)
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