Victoria DeYoung
Strategic Programs Manager
EHS&S

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Ryan Fogle
EPA

Dear Ryan:

Thank you for the opportunity to comment on the ENERGY STAR Imaging Equipment Test Method for Energy Use Draft 1 Rev.Aug-2017. Xerox is a charter member of the ENERGY STAR program and recognizes the program's value in enabling customers to make informed decisions regarding their energy use and environmental footprint.

Product Speed for Calculations and Reporting

For electro photographic equipment, the speed value should be selectable between ISO ESAT (Estimated Saturated Throughput), and manufacture's nominal speed value. The continuous speed of printer/MFD is almost the same, and ESTAT would be consistent with the Blue Angel standard in this regard.

Wi-Fi Connection Priority

Xerox is in agreement with the priority change in Table 6. However, if a limit value is considered, data with Wi-Fi connection should be collected before setting the limit. (Particularly conventional data of OM products are mostly based on USB).

Network Activity:

Network Activity Test is newly introduced as one-hour sleep test after step 10. It is unclear how and for what purpose this data will be used. Is this for data collection? Does the EPA intend to set any criteria concerning network activity?

There are many issues to this.

If the test after step 10 should be implemented, retesting all ENERGY STAR products creates a significant burden. Xerox suggests this needs to be tested for repeatability and should not be applied to existing products which already have Energy Star 2.0 certification."

If the repeated communication after the first minute should be incorporated in the test, the test condition is hard to fix, since the actual communication has a variety of frequency and other parameters.

The sleep power consumption of Step 5 in Table 8 is used for the calculation during night and holidays, where little "communication" occurs via network. Thus Step 5 should not be changed.

This proposed test method is different from the actual use environment, and would not render useful data.
- Power consumption measurement for one hour only with the first one-minute network communication does not replicate real world conditions.

- MIBWalk of SNMP and the specified command of NBNS are not used in the ordinary network environment.

As described, no wake-up should occur under the protocals selected. However, when tested according to the proposed procedure, the UUT must wake to some state to respond. The definition of wake-up should be clarified.
There is also a concern about the accuracy of testing conditions.
- SNMP is a protocol, which can be expanded freely by any manufacturer.
- Defining some sort of specification would be necessary.
- Packet-issuing frequency and timing depends on OS as well as PC.

The repeatability of test results cannot be guaranteed among different test environments. Xerox recommends delaying network implementation until a repeatable test procedure can be developed and consistent data can be collected. Industry should assist EPA in creating a test procedure that will accomplish EPA's goals.

Paper Assumptions:

While Xerox is in agreement the current values should change, we are concerned that EPA is only using a subset of market data to determine values. The EPA should gather additional data from manufacturers across various market segments. It would also be important that the test method does not change. However, changing only the calculation gives rise to contradictions. Additionally, if used, there would need to be customer education to avoid confusion with Blue Angel, and data from older testing methods

Additional Comments:

71 Table 4
As to Taiwan spec, please consider accepting A4 test, because A4 size is dominant in the current Taiwan market, letter size being partial.

281 Table 9
Measurement of default delay time to sleep mode is added in Step 4 in Draft 1 test method. This constitutes a change in measurement practices. What is the purpose of this change?

Sincerely,

Victoria DeYoung
Xerox Corporation