Comments on ENERGY STAR Imaging Equipment Version 3.0 Test method Draft 1

September 11, 2017

JBMIA Printer/MFD Division Technology WG
JEITA Printer Energy Saving WG

<Comments and questions regarding the draft>

Network Testing

・The establishment of Network Activity Test conflicts with the EPA's revision policy Obj1 (Increase representativeness of the test method).
We may agree to investigate the influence of Network over the sleep power consumption. However, we oppose setting specific tests for imaging equipment, which constitutes only a fraction of the entire networked devices. The EPA should take the initiative to establish the power consumption measurement method during sleep mode (a.k.a. network-standby mode) for networked devices in general.

・Network Activity Test is newly introduced as one-hour sleep test after step 10. How and for what purpose will its data be used? May we suppose this proposal is only for data collection and the EPA does not intend to set any criteria concerning network activity?

・If the test after step 10 should be determined, re-testing all ENERGY STAR products urges a lot of burden. Please apply this test to new products, which will be tested and registered anew.

・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 Table8 is used for the calculation during night and holiday, where no "communicate" occurs via network. Thus Step 5 should not be changed.

・The proposed test method is different from the actual use environment.

Power consumption measurement for one hour only with the first one-minute network communication does not represent the real world.

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

It is described that these protocols are selected so that no wake-up should occur. However, when tested according to the proposed procedure, the UUT actually wakes up. The definition of wake-up should be given clearly.

・There is a concern about the fairness/repeatability 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.

Print Speed

・Regarding electro-photographic equipment the speed value should be selectable between ISO ESAT and manufacturer's nominal speed value, because the continuous speed of electro-photographic Printer/MFD is almost the same as ESAT. (See the speed definition of Blue Angel RAL-UZ 205,)

Paper Usage Assumptions

・It is dangerous to determine the AMPV curve based on only two manufacturers' data. The EPA should ask more manufacturers to provide more data.

・No change of test method is welcome. However, changing only calculation gives rise to contradiction. There is no change in ranking, even if the equation is altered with the factor 1/4, which only reduces the TEC value difference between products.
The harmonization with Blue Angel etc. will be lost. In case TEC has been used for CO_2 calculation, the continuity will be lost. Such confusion in the market would be the result of equation change. We strongly request that the calculation equation should not be changed.

・We propose to delete Image/Day of Table 11. This is not used in TEC calculation.

Wi-Fi Prioritization

・Data with Wi-Fi connection should be collected before setting the limit value. Particularly, conventional data of OM products (inkjet) is mostly based on USB connection. Therefore, Wi-Fi data collection is necessary.

Other

71 Table 4

As to Taiwan spec, please consider accepting A4/70gsm test, because A4 size with paper weight 70gsm 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. Let us know the purpose of this change.

END