Comments on Product Specification for Imaging Equipment
1. Eligibility Criteria Draft 2, Version 3.0
2. Test Method for Determining Imaging Equipment Energy Use Draft 3, Rev. July-2018

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1. <u>Eligibility Criteria Draft 2, Version 3.0</u>

1) **1 DEFINITIONS**
   A) Product Types
   8) <u>Professional Imaging Product</u>

   As this draft added the weight provision, Professional Imaging Product definition gets clearer.
   However, we think there is a need to add more differentiations and we are continuing to study such provisions. Our further proposal about the definition will be submitted at August end together with our comments for Professional Imaging Product test method Draft 1.

2) **2.2 Excluded Products**
   2.2.2
   <u>iii Professional Imaging Products</u>

   In the comment matrix the EPA answered regarding the handling of Professional Imaging Products that *"EPA confirms that Professional Imaging Products remain in scope of the Version 3.0 specification. They will be tested as TEC products and compared to the other TEC product types when setting requirements, as they were in V2.0."*. This ensures the registration of Professional Imaging Products for V3.0. On the other hand, Draft 2 excluded Professional Imaging Products, and this is conflicting with the EPA answer in the comment matrix.
   Thus Professional Imaging Products should be removed from the "2.2 Excluded Products", following the comment matrix.

   Additionally Professional Imaging Products will be given a new criteria in V3.1. This means that manufacturers have to meet V3.0 and V3.1 in a very short period. This would

impose a huge burden (particularly to meet V3.0) on manufacturers due to big design change etc. This will cause also confusions for product purchasing divisions to find out if the product is certified or not. Thus we request a grace period for Professional Imaging Products until V3.1 gets effective. One idea is to establish "CERTIFICATION CRITERA" for Professional Imaging Products in V3.0, which references V2.0 criteria including TEC calculation equations without any change.

3.3.2 Typical Electricity Consumption
<u>Line 375</u>

There is a description that "Maximum TEC Requirement (TEC_{REQ}) specified in Equation 6", this "TEC_{REQ}" seems to be incorrect. The right term would be "TEC_{MAX}". It should be corrected.

<u>Line 400,419,442 "rounded to the nearest 0.1 kWh/wk for reporting"</u>

This description conflicts with Table 6: TEC Requirement, which is written as "TEC_{REQ} (kWh/wk, to the nearest 0.01 kWh/wk for reporting". This rounding to 0.01 is not in accordance with 0.1. The latter should be corrected to meet the description of Table 6.

<u>Line 441 & Table 6</u>

There are descriptions in Line 441 and Table 6 to round TEC_{MAX} and $TEC_{REQ.}$ Does this mean to round the criteria value itself or to round the TEC value for reporting? We would like to make sure.

<u>Table 6: TEC Requirement</u>

The description of "TEC_{REQ} (kWh/wk, to the nearest 0.01 kWh/wk for reporting)" seems to have dropped "rounded". This should be corrected.

As we checked the dataset, we found that some speed bins do not meet 25% pass rate. They are speed bins for Mono MFD 1-20ipm, 61-80ipm and Mono Printer 136ipm+. We request that the pass rate of these bins should be reconsidered to meet 25% or more.

3) **3.3.4 Recovery Time**

Table 7: Determination of Maximum Recovery Tome (minutes)

The value "45" for Longer Recovery Time of Product Speed "20 < s $\leq$ 30" is different from the BA criteria "30". It should be corrected to "30".

4) **3.4.3 Sleep Mode Power Consumption**

Table 9: Sleep Mode Power Allowances for Functional Adders

Some products sold in partner markets Japan have cordless handsets. The adder is necessary and used.

5) **5 USER INTERFACE**

With the described link http://eta.LBL.gov/Controls no detailed information is available. The right link should be confirmed and revised.

2. Test Method for Determining Imaging Equipment Energy Use Draft 3, Rev. July-2018

1) **4.1 General Test Setup**

   Table3: Input Power Requirements for Products with Nameplate Rated Power Greater than 1500W

   There is a strong trend that products targeted at Japan have 200V power source. We request to add 200V for Japan in Table 3.
   With the same reason we request to add 200V line (ex. 208-240V) for North America/Taiwan.

2) **7.2 Measurement Procedures**

   Table 8: TEC Test Procedure for Printers, Digital Duplicators with Print Capability, and MFDs with Print Capability

   Table 8 Step 4 has no unit description. "Minute (min)" should be put there.

   Table 8 &
   Table 9: TEC Test Procedure for Digital Duplicators without Print Capability and MFDs without Print Capability
   Step 2

   Concerning Step2 to enter Ready Mode, we propose to add the following to Note.

   "Step2: To make sure that it is in a stable READY condition, one-page image print may be conducted as needed."

   [Reason]
   There is a case where Active0 time gets longer than Active 1 time. (This makes the Recovery Time negative value.) This may be caused, for example, because the initial install time of application soft is added for Active 0 time measurement. This can be avoided, if one dummy print is conducted before Active 0 time measurement. This countermeasure should be written clearly.

   Step 4

Table 8/Table 9 Step4 "Default delay time to Sleep" is newly set test step. However, the data for "Default delay time to Sleep" is shown in the current CIE dataset.

We request in re-application of the current ES products, the current data in "ENERGY STAR TEC Data Collection Worksheet" may be used and for the new "Default delay time to Sleep" the values shown in the current dataset may be used in order to decrease the burden of manufacturers.

END