Comments on

1. Product Specification for Imaging Equipment Test Method for Determining Professional Imaging Product Energy Use Draft 1, Rev. July-2018

&

2. Eligibility Criteria Draft 2, Version 3.0 (Late Comments)

August 31, 2018 JBMIA Printer/MFD Technology WG JEITA Printer Energy-saving WG

 Products Specification for Imaging Equipment Test Method for Determining Professional Imaging Product Energy Use Draft 1, Rev. July-2018

1) 4 TEST SETUP 4.1 General Test Setup <u>B) Ac Input Power</u>

There are many Professional Imaging Products with the input voltage specification of 200V line. Therefore, we propose the addition of description for "North America, Taiwan" and "Japan" in Table 3 as follows.

North America, Taiwan : 208Vac – 240Vac、 The voltage used shall be reported. Japan : 200Vac

I)Paper Specifications

Although "Error! Reference source not found" is described in Line 68, it should be corrected to "Table 4".

J) As-shipped Condition

It should be clearly stated in the main text as well as the title that the test should be conducted in as-shipped condition. Furthermore, we propose to add that BQ/BP is a single mode. The amendment is as follows.

1) Professional Imaging Products shall be tested in their "as-shipped" configuration under one Best Quality/Best Productivity (BQ/BP) condition.

K) Product Speed for Calculations and Reporting

Professional Imaging Product is mainly used for printing commercial deliverables, and Copy and Scan tasks are supplementary functions. And we think the reporting of "copy speed" and "scan speed" is not necessary as the product speed. And unlike Office Equipment, we propose the reporting of the highest manufacturerclaimed color print speed for color product and the highest manufacturer-claimed monochrome print speed for monochrome product as for Professional Imaging Product.

Test image which is different from the test image of product speed test should be used for the TEC test of Professional Imaging Product. For the TEC test of Professional Imaging Product, we propose to use the test image of ISO/IEC 24734 AdGraphics Adobe Reader file page 2 that is higher coverage than that for TEC test of Office Equipment.

2) 5 PRE-TEST UUT INITIALIZATION FOR ALL PRODUCTS 5.1 General Initialization A) Prior to the start of testing, the UUT shall be initialized as follows 3) Power on the UUT and perform initial system configuration,

There are some products that have the Auto-off function among the products that meet Professional Imaging Product requirement. Therefore, we request to add following item.

b) <u>Auto-off for Testing for Professional Imaging Products</u>: If the product has Auto-off capability and it is enabled as-shipped, it shall be disabled prior to testing.

3) 6 PROFESSIONAL IMAGING PRODUCT TEST PROCEDURE 6.1 <u>Testing in Accordance with ISO 21632</u>

We think that the test for Professional Imaging Product should not completely comply with ISO21632 4.5.4 and the customized test procedure should be developed for ENERGY STAR based on ISO 21632. We are continuing to study the test procedure in detail and are preparing to propose it.

2. Eligibility Criteria Draft 2, Version 3.0 (Late Comments)

1) 1 DEFINITIONS A) Product Types 8) Professional Imaging Product

As a result of our study for the specification of latest Professional Imaging Products, we have reached to the conclusion that the revision of requirement is necessary. We propose as follows.

h) Digital front-end (DFE)

DFE is indispensable feature for Professional Imaging Products, so we propose to change this requirement from additional features to required features.

k) Memory storage equal to or greater than 1,024 MB

Office Equipment with such memory capacity increases recently, since this feature has been no longer appropriate to the requirement for differentiation, we propose to delete this feature from additional features.

Addition of "Power Consumption" and "Warm-up Time" as required features As characteristics to differentiate the Professional Imaging Product from Office Equipment, there are features that power requirement for Professional Imaging Products is large and which have heat storage type fuser unit to print on wide variety of media. Threshold values for requirements are as follows.

Power Consumption equal to or greater than 2,000 W; Warm-up Time greater than 60 second;

And the usage of Professional Imaging Product is not only for commercial deliverables but also for mass printing for internal use or data printing for enterprise system. Therefore, we propose to add the description of "Centralized Reprographic Department (CRD)". The amendment is as follows.

8) Professional Imaging Product: A printer or MFD marketed as intended for producing deliverables for sale and Centralized Reprographic Department (CRD), with the following features.

2) 1 DEFINITIONS

- E) Additional Terms 5) Digital Front-end (DFE)
- d) Professional Digital Front-end (DFE)

About item ii

We think the proposed processor performance per socket is too high. If distinguishing the high performance DFE from the Type1 and Type2 DFE, the appropriate value is 10 or so.

About item iii

If Professional Digital Front-end (DFE) is defined as the server which has ECC/ BOB/ Buffered DIMM, DFE like high performance PC is excluded. And the function of ECC and buffered DIMMs/BOB is the proposition of credibility, not related to DFE function. Therefore, this requirement is not necessarily for DFE.

Lastly, EPA has established the Professional Digital Front-end (DFE) category, does EPA plan to make criteria for this? And if making the criteria, what condition is necessary to create the criteria? Please let us know about it.

3) 3.3.1 Automatic Duplexing Capability

There is a description of "enabled by default" on line 353, does this request to turn on the duplexing function under default condition? We request clear explanation on this point. If this is the requirement of default setting, it should be harmonized with BA standard.

END