

Epson

1. Regarding 3) Energy-Efficiency Specifications for Qualifying Products, A. Active Mode, Tier 2, as JEITA requested (Please refer to JEITA's comments on Draft 3 Eligibility Criteria posted on the web site, http://www.energystar.gov/ia/partners/prod_development/downloads/power_supplies/ACFA5.pdf), we would like to know specifically how the EPA analyzed the collected data from the technical prospects. These are not direct comments on the draft 4 but we believe that it is important and valuable for us to understand fully and correctly the background behind how the EPA made up the criteria on Tier 2.

2. Regarding 3) Energy-Efficiency Specifications for Qualifying Products, B. No-Load Mode, Tier 2, our concern is how we handle the case of when a product that does not meet the criteria is found during the market surveillance. Our ideas for the solution are to use some statistical methods and calculations which are able to prove that almost all our products on the market meet the criteria.

3. Regarding 5) Effective Date, we need a minimum of 1 year between the finalization of the criteria and the effective date for our manufacturing process. The process mainly consists of making our company standards based on the Energy Star specification, designing products, manufacturing products, shipping products) in that sequence. Once the criteria are finalized, we are able to start the manufacturing process. Please understand that drafts are regarded only as reference information and we are not able to start the manufacturing process.

4. Regarding 7) International Efficiency Marking Protocol, we are presently able to determine and confirm a unit's efficiency by other methods and documents than this protocol. Unfortunately, this protocol does not seem to give great benefits to us. We would like to emphasize that we prefer a unified global energy saving standard and mark for our products sold worldwide. Instead of this protocol, we would like to strongly ask the EPA to encourage China and other countries to participate in the Energy Star program and to harmonize the energy saving criteria and marks.

In addition, we have a couple of comments on the marking protocol as follows:

a) We are not sure that the Roman numeral I, II, III, IV, V, or VI will be able to represent compliances of all energy saving criteria worldwide besides China and Australia.

b) We suppose that the Roman numeral I, II, III, IV, V, or VI are allowed to be used worldwide for other purposes than this Marking protocol. Therefore, regardless of it being intentional or not, violation of the marking protocol does not seem to lead to any punishments worldwide.

Last but not least, for your information, on November 9, the JEITA Energy Star committee had a meeting in order to discuss the draft 4. The JEITA plans to translate the comments from Japanese to English after the meeting and let you have it by the due date, November 19.

If you have any questions and comments, please let me know. I really hope that the above comments will be helpful for you to finalize the Energy Star specification for single voltage external ac-dc and ac-ac power supplies. Thank you for your help. I am happy to work together and looking forward to hearing from you.