Konica Minolta's Comments regarding the present Energy Star Phase 1 Specifications:

As I stated during our meeting, the basic design concept for the each following categories are completely different each other.

- 1, Printer base engine: The pricing issue is the most critical and important factor with the reasonable specifications. Also for this point of view the printing size (A4 Vs. A3) becomes critical issue too.
- 2, Copier/MFD base engine: Both the specifications and the pricing issues are important and especially the user friendly operations and functions are key requirements..
- 3, Professional printing/copying base engine (230V, 60Hz model): The productivity and the reliability are the major factors in this case.

Based on this engineering minds, we would like to ask you to review the following items to your next "Phase 2 Energy Star Specifications".

A, Products category for TEC: There are 4 tables are provided right now for Phase 1 purpose but it was segregated without consider the product designing concepts described above.

- e.g. Product segregation
 - A-1: The base engine design concepts described above should be reflected.
- A-2: Marking technologies: Same as the present condition.
 - A-3: Color/B&W: Same as the present condition.

Also within this segregation area, we would like to ask you to review of the conditions of the Interface method (USB only Vs. Network capable) since for the power consumption concerns these Low Speed segment devices will be affected in certain degree due to its small interface variations.

B, Digital Front End (External Vs. Internal) issue:

At this time we do not use the external DFE device, therefore, we are using the Internal DFE equivalent device. In this comparison the external DFE can be calculated the power consumption separately but the Internal DFE equivalent version will be calculated it as all in one shot even almost the same functionalities can be enjoyed.

By this reason we would like to ask you to find the way to compare these two conditions in a fair manner on the next Phase 2 specifications.

In addition that we feel the present definition or explanation of the DFE which is required the same specifications as the PC is not sufficient. We would like to see more clear explanation for that issue.

C, Measuring method for the Phase 2 Specifications:

We hope you can maintain the present basic measuring method as is. Otherwise it force us to re-measure all data again with the present model even it may meet the new Phase 2 requirements. Simply we would like to avoid or minimize our side double works.

D, Online Products Submittal Form issues:

A) Company name or product name condition (Upper case Vs. Lower case): It should be accepted either case automatically and display it in one condition on the EPA's public Web site.

e.g. KONICA MINOLTA Vs. Konica Minolta.

Quite many end users can not figure out which one is the correct or not.

B) Fax capability with mandatory fax speed fill in.

We must fill the fax speed once we put the Fax capability "YES" with present form. We feel the fax speed is no longer such critical issue any more and it should not be as the mandatory fill in condition.

E, Other subject:

We would like to ask you to stay the "IEEE 1621 the Moon for the Sleep mode symbol" issue as "Recommended" basis. Or if you need to request us to put it as the mandatory basis then at least we need to have certain lead time to deplete the stock in our warehouses.