

**Subject: Pitney Bowes's comments on revising Version 1.0 imaging equipment ENERGY STAR specification.**

In 1996 Pitney Bowes Inc was allowed to add mailing machines as a product in the MOU for "ENERGY STAR® Program Requirements for Imaging Equipment". The justification was based upon the fact that mailing machines are essentially a special type of printer. We would like to keep our products as part of the program because our continual focus is on energy efficiency. Although we are a special type of printer, our development time, user experience, and relationship with global postal authorities makes our products distinctly different from a consumer printer. Because of the differences, we are requesting that mailing machines continue to have a Standby power level of "N/A" for Tier II.

Listed here are some of the reasons that we are making our request:

- Global Postal Approval (highly regulated industry): We are not allowed to market our product without the approval. The interval between MOU revisions presents an extreme hardship for us by requiring us to re-submit to each of the countries where we are already approved. Unlike consumer printers, after development and qualification of a product, we are required by law to submit the mailing machine to Posts around the world for their evaluation and approval. Re-approval is necessary for any software and/or hardware changes. Each Post, of course, has its own postage and business rules, so each meter variation is different. There are approximately 25 countries requiring unique attention. The cost for global approvals for all mailing machines is conservatively \$5 million per iteration. A further burden on our business is the approval time of at least six months.
- Total time for development, qualification and postal approval is from 12 – 18 months.
- User experience:
  - After being in the 'standby' mode, the customer will need to reset all settings for the postage and configuration if the 'preset' is not programmed.
  - Initialization from 'standby' requires purging of ink each time.
  - Initialization time may take up to a minute and a half.
  - Initialization may require the zeroing out of the scale.
  - Passwords may need to be re-entered, since the meter contains funds and is protected from use by unauthorized persons.
  - Accepted practice for mailing machines is operation on demand.
  - The entire purpose of the mailing machine is to be more productive.

Please consider our request that mailing machines continue to have a Standby power level of "N/A" for Tier II.