RICOH's comment for ENERGY STAR Imaging Equipment Version 1.0 Tier 2

RICOH's recommendation for the change in Tier 2 specification language

1. Imaging Equipment with TEC approach shall have a maximum delay time of 60 minutes. Default delay time (when shipped) shall be set at 15 minutes
2. However, for those Imaging Equipment which comes back from minimum sleep mode to ready mode within 10 seconds, it shall have a maximum delay time of 30 minutes. Default delay time shall be set between 0 – 15 minutes.

Below is a table showing the difference between the above 2 recommendation

	Recovery time from minimum sleep mode	Default delay time	Max. delay time
A	> 10sec	=15min	60min
B	≦10sec	≦10min	30min

Rationale for RICOH's comment:

1. ENERGY STAR Program should contribute to overall electricity consumption reduction in market place.
2. It is important to minimize discrepancy in electricity consumption between TEC data and actual electricity consumption in market place.

Products with quick recovery time (within 10 seconds) result in more users taking advantage of sleep mode. This will lead to further energy conservation. Thus ENERGY STAR program should offer an incentive to TEC value for those products with shorter recovery time.

Currently, users/purchasers need to make product selection based on presence of ENERGY STAR mark (either ENERGY STAR-qualified or not). However, TEC value is not currently available via EPA's qualified product list. RICOH believes that TEC Data (numeric value) be made available, providing more data to users for selecting products with higher energy efficiency. TEC data/value is already being utilized by ECCJ as well as required for certain RFPs (Request For Proposals = bid requirement). This is to show that, users want to make comparison by TEC data, not just presence of ENERGY STAR mark. Therefore ENERGY STAR should make appropriate changes in terms of its data disclosure scheme. This

enhancement will influence manufacturers' product development direction to design products that benefit users in saving energy without sacrificing productivity.