

ENERGY STAR for Imaging Equipment
Comments Tracking

Document	Internal or External	Commenter	Line #	Date Submitted	Topic	Comment	Status	Response
Pre-Draft 1	External	Nobuyuki Miyake (Canon)	0	2/28/2008	Default Standard	As you know well, Energy Star standards was initiated as a voluntary energy-saving standard, and has become a global standard as bidding conditions for commodity purchasing. We are afraid that it be employed as a mandatory standard as described above considering these circumstances. We sincerely appreciate your consideration of these circumstances relating to the creation of Tier 2 criteria, especially a top 25% standard that might be a mandatory one in the future field.	Completed	The ENERGY STAR Program is a voluntary program that identifies top performing models in the market in terms of energy efficiency, rather than simply excluding lower performing models. As such, the specification setting process does not consider the broader range of factors relevant to establishing a minimum efficiency level. When consulted by lawmakers, EPA makes every effort to be clear about the intended role of ENERGY STAR performance specifications.
Pre-Draft 1	External	Danish Energy Authority	N/A	10/22/2007	Definition	ENERGY STAR definition of office imaging equipment is suitable for the purpose of EuP.	Completed	Agreed
Pre-Draft 1	External	Konica Minolta	302	12/6/2007	Digital Front Ends	The definition of DFE is not clear enough.	Pending	Please provide an alternate definition for consideration.
Pre-Draft 1	External	Konica Minolta	395	12/6/2007	Digital Front Ends	Find ways to compare external vs. internal conditions.	Completed	The current language in the specification allows for the subtraction of functionally-integrated DFE's energy consumption in Ready mode from the product's total TEC result before comparing the product's final TEC to the criteria. In the same way, the energy consumption of an external DFE is not considered in the final calculation of a
Pre-Draft 1	External	Catronia McAlister (UK Market Transformation Programme)	N/A	11/12/2007	EuP	It would be worthwhile for EPA to examine the EuP study on imaging to ensure harmonization of approaches.	Completed	EPA agrees and will harmonize approaches is much as possible under the scope of Tier 2.

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Pre-Draft 1	External	Catronia McAlister (UK Market Transformation Programme)	387	11/12/2007	External Power Supply Requirement	Recommend consistency of approach with other office equipment specifications currently under review, and that wording is harmonized with latest external power supply	Completed	Agreed. Imaging Equipment (IE) products that make use of other products or components addressed by ENERGY STAR specifications must use components that are capable of meeting the respective
Pre-Draft 1	External	Konica Minolta	N/A	12/6/2007	Interface	Review conditions of the interface method (USB only vs. network capable)	Pending	Please provide specific recommendations for what you feel should be modified with regard to interface.
Pre-Draft 1	External	Konica Minolta	N/A	12/6/2007	Online Products Submittal	Would like company names listed with standardized syntax and formatting (KONICA MINOLTA vs. Konica Minolta)	Completed	Company names appear as they are listed by partners in OPS. EPA encourages partners' use of a standardized syntax and formatting, and is willing to help clean up any past data that may have been reported outside of that standard formatting system.
Pre-Draft 1	External	Konica Minolta	N/A	12/6/2007	Online Products Submittal	Feel the fax speed is no longer a critical issue, and should not be included as the mandatory fill in condition.	Pending	EPA will consider making this field optional in OPS if fax modem speed is no longer important in the marketplace. Currently there is no requirement on the the level of fax mode speed.
Pre-Draft 1	External	Konica Minolta	N/A	12/6/2007	Other	Would like the "IFEE 1621 the Moon for the Sleep mode symbol" to be a suggestion. If it is mandatory, sufficient time must be granted to deplete the warehouse stock.	Completed	Agreed. EPA will not make this a requirement in the specification.

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Pre-Draft 1	External	Rochelle Richards-Knowlden (Canon U.S.A.)	581	12/13/2007	Other Areas	Please clarify the definition of "network connecting circumstance" on the measurement method of TEC. Products which can be connected to the network are measured with connecting to the network according to the measurement method of TEC. However we have not defined the network connecting circumstance yet though clearly defined how to connect to the network. There might be some possibilities that we do not measure fair TEC values.	Pending	EPA will propose a clarification on the TEC measurement conditions with network communication defined.
Pre-Draft 1	External	Konica Minolta	422	12/6/2007	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.	Completed	The data provided by stakeholders during the Tier 1 development process supported the creation of four specification levels for TEC products. Please clarify how product designing concepts would justify a different number of specification levels.
Pre-Draft 1	External	Kousuke Ito (RICOH)	473	12/21/2007	Recovery Time	Imaging equipment shall have a maximum delay time of 60 minutes. Default delay time set at 15 minutes. Imaging equipment which comes back from minimum sleep mode to ready mode within 10 seconds, shall have a maximum delay time of 30 minutes. Default time shall be set between 0-15 minutes.	Pending	EPA has not received supporting data from partners to justify including a recovery time requirement to the Draft 1 specification. EPA requests manufacturers propose how setting maximum delay times under the TEC approach provides significant energy savings.

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Pre-Draft 1	External	Rochelle Richards-Knowlden (Canon U.S.A.)	412	12/13/2007	Requirement for Duplexing	If duplexing requirements are needed to be revised, please take into account the applicable product categories because there are some product categories that are not needed the function for duplexing, eg. large format inkjet printers and so on.	Completed	EPA has not received comments that support the need to amend the duplexing requirements. Therefore, there are no plans to modify the these requirements during development of the Tier 2 specification.
Pre-Draft 1	External	Mark Corbett (Pitney Bowes)	497	1/17/2008	Standby Requirement	Mailing machines should continue to have a standby power level of "N/A" for Tier II.	Proposed	EPA is proposing to define standby power levels at 1.0 Watt for large format OM products and mailing machines currently listed as "N/A".

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Pre-Draft 1	External	Catronia McAlister (UK Market Transformation Programme)	371	11/12/2007	TEC Approach	Industry questioned the need to compare between OM and TEC printers, but fundamentally, a non technology-specific approach would be preferable. Some issues were identified in the EuP study (www.ecoimaging.org) with the TEC methodology overstating usage. It would be worthwhile the EPA addressing these issues and endeavouring to improve the TEC approach accordingly. Already declared values could be adapted in retrospect.	Completed	EPA will retain the dual TEC and OM approaches in the development of the Tier 2 specifications. Based on submitted test data, opportunities for greater energy savings, and engineering advancements, EPA will continue to monitor this issue.

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Pre-Draft 1	External	Kousuke Ito (RICOH)	N/A	12/21/2007	TEC rationale	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.	Pending	Agreed. EPA plans to present this proposal of making TEC values publically available to stakeholders during the May 7 meeting.
Pre-Draft 1	External	Konica Minolta	325 368	12/6/2007	Test Procedure	HP does not support any changes in test procedures	Completed	EPA has not received comments that support the need to amend the test procedures. Therefore, there are no plans to modify the test procedure during development of the Tier 2 specification.