

Vienna, 02 April 2004

**Austrian comments on  
Energy Star Qualified Imaging Equipment Specification Revision  
Directional Draft**

The approach outlined by US EPA in the Directional Draft paper “Energy Star Qualified Imaging Equipment Specification Revision” is welcome. The paper is a good start to discuss process on the revision of the imaging equipment specification.

Nevertheless it would be very helpful, if the upcoming steps in this process of developing the imaging equipment specification will be closely co-ordinated and concerted between the US EPA and the EC. The timely involvement of both parties is important and the co-operation is essential to accelerate the process and to reach a common position in the discussions with industry.

The dual tracked approach – as presented in the Directional Draft paper – is interesting and in particular the introduction of on mode power consumption through the “Typical Electricity Consumption (TEC)” as outlined for copiers and MFD is welcome. But also within the TEC approach it should be considered if in addition to the TEC specification some specific minimum requirements for other modes (e.g. plug in off/standby  $\leq 1W$ ) could be introduced.

The TEC energy efficiency benchmark should be related on a day basis - Wh/day instead Wh/h - in order to avoid misunderstandings.

Also for fax machines a plug in off/standby mode the  $\leq 1W$  seems to be tenable and should be used in general for all type of imaging equipment.

The intention of setting the Energy Star specifications at the top 25 % of energy-efficient products available in the market is important in our view. Therefore it is necessary to base and develop the specifications on a representative and actual product database (for the US and European Market as well).

We are looking forward to the discussions in the upcoming meeting on 23 April 2004 in Frankfurt.