



JEITA's principal Comments on
Imaging Equipment Specification Directional Draft

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Chairperson of the Energy Star Committee of JEITA



Who is JEITA?

1. JEITA: Japan Electronic & Information Technology Industries Association
2. Representative for Japanese computer, semiconductor, and AV-home electronics industries, about 500 member companies



Who is the Energy Star Committee of JEITA?

1. Energy Star Committee: 18 IT equipment companies (Seiko Epson, Canon, Ricoh, Fuji Xerox, Oki Data, PFU, NEC-Mitsubishi Electric Visual Systems, etc.)
2. Printer, Scanner, Display, and PC working groups
3. Sharing information on Energy Star and other energy saving laws and regulations worldwide
4. Discussion and submission of our opinions



Section 2.1 Introduction to a TEC Energy-Efficiency Specification

1. Agree to use 2 Tracks, Track 1 and Track 2
2. Agree to a formula to presume a 24-hour cycle

$$\text{Energy Efficiency} = [(8A + 16B) / 24] \text{ Wh/h}$$

Support ideas on the number of sheets per job

3. Ink Jet based MFD should be covered by Track 2 approach and be allowed additional power in the table 2



Section 3.1 Introduction to Operational Mode Approach

1. Agree to consider printer/fax combination units as MFDs
2. MFDs based on Ink Jet and thermal transfer should be covered by the Track 2 approach



Section 3.2 Proposed Energy-Efficiency Criteria: Operational Mode Approach

Table 3. Monochrome Printers (Excluding Ink Jet)

1. Impact Printers should be included under another table (not Table 3)
2. Consider 2 technologies, “serial” and “line” for impact printers
3. Our proposed formula of power in sleep mode: $\leq 0.59X+5.74$



Section 3.2 Proposed Energy-Efficiency

Criteria: Operational Mode Approach

Table 4. Color Printers (Excluding Ink Jet)

Table 5. Parallel Color EP Printers

Product Speed of EP printers should be defined as the fastest speed (which is usually the speed in monochrome mode).

Section 3.2 Proposed Energy-Efficiency Criteria: Operational Mode Approach

Table 6. Large Format Printers

1. Separate energy-efficiency criteria for ink jet and other technologies (EP, thermal transfer)
2. Reconfirm the 6 models (Power in sleep $\leq 17W$) in these 2 years

Section 3.2 Proposed Energy-Efficiency Criteria: Operational Mode Approach

Table 6. Large Format Printers

1. Confirmed 5 models ($40 < \text{ipm}$, Power in sleep $\leq 17\text{W}$) in these 2 years
2. 2 models are out of scope (Unisys UDS45W): Maximum paper size 11"X17"
3. 3 models are questionable: Print Engine (Oce TDS800, TDS600)



Section 4.3 Treatment of Products with Varying Functionality

1) How should MFDs be addressed?

1. Separate MFD specification and test procedures
2. Note that control section is common for each functionality (printer, scanner, etc.)



Section 4.3 Treatment of Products with Varying Functionality

3) How should network products (i.e. scanners) be addressed?

1. Separate energy-efficiency criteria for networked and non-networked products
2. Networked products, with cable and wireless, should be covered.
3. +5W allowance for networked products



Section 4.3 Treatment of Products with Varying Functionality

3) How should USB-powered scanners be addressed?

1. Consider power limitation of USB-powered scanners (2.5 W or under)
2. Separate energy-efficiency criteria for USB-powered scanners
3. Consider harmonization with USB-IF standard (power limitation: 2.5 W or under)



Section 4.3 Treatment of Products with Varying Functionality

6) How should photo printers be addressed?

1. Consider additional power for some imaging process and memory card interface
2. +5W allowance for photo printers

Section 4.4 Refinement of Definitions

7) How should recovery time be defined?

1. Agree to definitions in Appendix A (P.22)
2. Recovery time does not lead to energy saving
3. Not necessary for printers and scanners



Section 4.8 EPA's Power Supply Strategy

1. We make our products and power supplies energy-saving as a complete product
2. Avoid double and duplicated specifications

Appendix A: Terminology and Definitions

Operational Modes and Activities

H. Plug-in Off/Standby, I. Manual Off

1. Harmonization with FEMP (definitions and requirements)
2. Is Plug-in Off/Standby applicable only for products with a power switch?



Appendix A: Terminology and Definitions

Additional Terms D. Media size

1. Clarify how to handle smaller letter-sized paper printers
2. Product speed converted for A4 paper
3. Use table for standard size paper printers



Appendix B: Partner Commitments

Labeling of Energy Star qualified imaging equipment products

1. Consider attractive product appearance
2. Allow us to choose a place for the Energy Star mark: on top/front of the product, on the product packaging, in product literature, **or (not and)** manufacturer's internet site



Appendix C: Discussion of Elimination of Automatic Grandfathering and Remanufacturing

1. Sufficient transition period is necessary
2. Consider the necessary time to develop new products (2 years at least) in a transition period



Appendix C: Discussion of Elimination of Automatic Grandfathering and Remanufacturing

1. Watching carefully most appropriate way to address remanufactured products
2. Track 2 operational approach: by fall 2004
Track 1 TEC method: first quarter of 2005
Backgrounds for the schedule and a more detailed schedule



Thank you for your attention.

If you have any comments and questions,
please contact our JEITA's secretariat,
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