June 14, 2005

JEITA's Comments on the First Draft Test Procedure — Operational Mode Approach for Imaging Equipment (Printers)

JEITA International Energy Star Committee

*JEITA International Energy Star Committee's comments on the First Draft Test Procedure — Operational Mode Approach for Imaging Equipment are stated below.

*JEITA International Energy Star Committee handles printers, printer-based MFDs, and scanners. The following comments relate to these products.

0. Scope and Marking Technologies

(1) Marking technologies such as Ink Jet, Dot Matrix, or Impact

• Thermal transfer, dye sublimation, and solid ink jet technologies should also be tested with the OM approach and not with the TEC method.

Reason: The TEC method is intended to enable recovery time to be compatible with energy saving. The recovery times of ink jet, dot matrix, impact, and other marking technologies are almost always zero. Consequently, we find there is no necessity to apply the TEC method to these marking technologies where recovery time demands are unnecessary.

• The following comment is the same as the comment JEITA submitted regarding the TEC draft: "We would like TEC to cover only EP technologies."

Comment submitted on May 19

Although we already commented on this subject in "JEITA's Comments on Imaging Equipment Revised Draft Test Procedure," which was submitted on March 1, 2005, it bears repeating, as this is an important topic.

Table 1. Products and Marking Technologies Evaluated with TEC in Revised Draft Test Procedure Rationale, Typical Electricity Consumption (TEC)

•We request that TEC should not be applied to any printers other than ones using EP (electronic photo) technologies. In other words, TEC should be used only for electronic photo technologies.

Reason: We understand that TEC is used to enable recovery times to be compatible with energy savings in low power mode. Therefore, we believe that it will be sufficient to use TEC only for EP technologies.

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1. Test Parameters

(1) Test Pattern for Measuring the Speed of Standard- and Smaller-size Ink Jet Products

(a) ISO/IEC 24712

• This standard seems to cover only color ink jet products. The use of ISO 10561, for example, for mono-color products (such as impact technologies) should be made explicit.

• ISO/IEC 24712 is still under discussion. Therefore, we are concerned this may pose a risk to the

OM standard's schedule. It is JEITA's position that ISO 10561 should be employed.

2. Power Measurement Method

(1) The draft states "All power measurements are to be made in accordance with IEC 62301," but the IEC 62301 is still in the final draft stage. We are concerned this may pose a risk to the schedule for establishing the OM standard.

3. ENERGY STAR OM Measurement Procedure

(1) Ready power

- JEITA believes measurements of Ready power are not necessary.

  Reason: Considering the manner in which ink jet products are used, the time spent in Ready mode is insignificant compared to that in Sleep mode. Specifically, if the Ready mode time is around one to 10 minutes long, the sleep mode occupies almost all the rest of the time except when the product is in Print mode. In view of this time ratio, we think it is not necessary to measure power values during the short time a product is in Ready mode. We believe, therefore, it is unnecessary to require Ready power values to be reported to the EPA.

- What is the context and intent of collecting Ready power data?

  As explained above, JEITA feels it is unnecessary to measure power consumption in Ready mode. If the EPA has a particular intention or context for this measurement, we would like to first hear this explained.

4. Speed Measurement Procedure for Standard- and Smaller-size Ink Jet Products

(1) Are ipm results for printers smaller than A4/LTR to be converted to A4/LTR ipm speeds?

(2) Sending images in a page description language (PDL)

- We would like transfer methods other than PDL, such as sending rasterized images, to be allowed.
- We would like the data transfer to the printer to be left to the manufacturer's discretion.

5. Overall Comments

(1) Speed measurements for large-format products

The First Draft — Rationale states under Standard Test Pattern in Section 4. Speed Measurement Procedure for Standard- and Smaller-size Ink Jet Products "the test image be tiled across the width of the device to an integral number of pages." We would like the stipulation to read "the A4/LTR image be enlarged" instead of "test image be tiled" when reporting Energy Star speeds for large-format products.

Reason: The ipm speeds of ink jet and other printers when tiling images are dependent on the tiling method. Specifically, ipm speeds vary with the width of the interval set between the tiled images. Furthermore, because large-format products are often used to generate large images enlarged from smaller originals, some printer drivers may lack the "function" to tile the same image or different images.

For these reasons, we suggest using the "image enlargement function" when measuring the ipm speed of large-format products.