

June 14, 2005

From Roy Janssen on behalf of Océ-Technologies
To EPA/ICF-consulting
Copy

Subject **Remarks regarding Imaging Equipment OM-test procedures**

Océ-Technologies has only limited comments to your OM-related documents. However, you frequently refer to **IEC 62301**. So far we have not been able to find this standard on the internet, nor obtain a copy otherwise. Could you please provide us with a copy, or show us where we can obtain one?

Regarding the modes to be measured we want to note that for WFPS-devices the “**Ready-mode**” is lacking for certain types of equipment. Examples are water based InkJet-devices, as well as devices based on e.g. (heat-) radiation fusers (like Océ has in its program). These devices typically have only (Auto-)Off, Sleep-and/or Low Power, and Run modes. Only high-speed/high volume devices ($\geq \sim 7$ A0/min B&W printers, copiers and MFDs) always seem to have a Ready-mode. **Because of these large differences in technology we think it is unwise to specify the Ready Mode separately.**

Regarding the **speed** for Large Format products we agree to your proposal to use the maximum claimed speed.

Finally, as a market leader in WFPS, we think that the following **Large Format categories** are, or will become relevant:

- B&W (copiers, printers and MFDs in various speed-ranges)
- Colour: water based inkjet
- Colour (for special and productive applications): based on high-temperature (electrophotography, solid ink, and those that provide comparable functionality), UV-based (ink-) technologies, etc.
- Large Format scanners (B&W, as well as colour)