

THE DOCUMENT COMPANY  
XEROX

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Mr. Andrew Fanara  
Product Manager  
ENERGY STAR for Office Equipment and Consumer Electronics  
U. S. Environmental Protection Agency  
Washington, DC 20460

Andrew:

We appreciate the open communication and opportunity to comment on the Energy Star Operational Mode Test Procedure. While the proposal generally looks good, we are concerned with the requirement to provide ready power measurement data. Since it is our understanding that ready mode criteria will not be included in the Energy Star label specification, this requirement will result in unnecessary testing. Accordingly, Xerox recommends removing this test requirement from the test procedure. Please let us know if you would like to discuss.

Sincerely,  
Victoria DeYoung  
Xerox Corporation

C Michele Cahn  
Patricia Calkins  
Darcy Martinez  
Bruce Nordman