

Version 3.0 Professional Imaging Equipment Draft 2 Test Method Comment Summary

Topic	Subtopic	Comment	Response
<b>Future Specification Revision</b>	<b>Testing Professional Products</b>	<p>One stakeholder asked about EPA's timeline for the Professional Imaging Equipment:</p> <ul style="list-style-type: none"> <li>- Test Method;</li> <li>- Data Collection; and</li> <li>- Criteria Development.</li> </ul>	<p>EPA anticipates completing the development of the test method this summer. This includes the collection of comments and the resulting Final Test Method. Per the variety of feedback received from stakeholders related to data collection, EPA anticipates giving roughly 5 to 6 months for stakeholders to provide data to the Agency. Once the data has been collected, EPA will begin the development of criteria, which will be in the form of a dot revision. Further information on the data collection effort will be provided with the Final Test Method.</p>
<b>Measurement Procedure</b>	<b>Calibration</b>	<p>One stakeholder commented that typical jobs for professional products last longer than 5 minutes, such that any calibration performed at the start of the job would have a bigger impact on measured energy consumption than in real life.</p>	<p>Further investigation by this stakeholder showed that calibration does not meaningfully impact measured energy consumption during testing.</p>
<b>Paper Specifications</b>	<b>Size and Weight</b>	<p>One stakeholder requested that international paper sizes and weights be combined into two broader categories (1: North America, Taiwan, and Switzerland, and 2: Japan) and to reduce test burden.</p>	<p>EPA understands that the differences between paper sizes may be small. However, as with the TEC Test Method, Taiwan, as an ENERGY STAR partner market, was added in response to stakeholder feedback. As such, EPA has retained the requirements in this Final Draft Test Method, but is open to considering the change with the next revision.</p>
<b>Test Setup</b>	<b>Accessories</b>	<p>One stakeholder noted that some professional imaging equipment cannot function with just the base model without some optional accessories (e.g., finishing accessories) that must be chosen by the end-user. The stakeholder commented that products should be tested with these additional accessories in a minimal configuration, but the power required for the accessories should not be included in the test.</p>	<p>EPA believes that all accessories necessary for the product to operate should be included and measured during testing, which is consistent with the intent of ENERGY STAR across product categories. This is the intent of including language for testing in the as-shipped condition.</p>