UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
AIR AND RADIATION

February 10, 2012

Dear ENERGY STAR® Imaging Equipment Partner or Other Interested Stakeholder:

The U.S. Environmental Protection Agency (EPA) welcomes your input on the attached Draft 1 Version 2.0 ENERGY STAR Imaging Equipment specification, developed in consultation with the European Commission. The development of this specification began with a Framework document where we solicited feedback from stakeholders on our approach as well as with the development of the imaging equipment test method, led by the US DOE, nearing finalization.

In establishing the proposed performance levels, EPA analyzed data associated with over 2200 Imaging Equipment models currently available in the market. A masked version of the dataset is available on the ENERGY STAR Product Development Web site along with all relevant specification development documents

The Draft 1 Version 2.0 specification includes the following key changes from the current Version 1.2 specification:

1) **New Product Categories**: As a result of stakeholder input, impact MFDs and high performance ink jet printers have been added to the scope of the specification. Impact MFDs have been added as an OM product category and small format, high performance ink jet printers have been added as a TEC product category.

2) **Maximum TEC requirements**: Analysis of currently qualified products shows that many MFD products can perform as well, if not better than, printer products of the same color capability and speed, and therefore do not require a higher power consumption allowance. EPA is proposing to combine MFD and non-MFD products into one category but maintain separate performance requirements for color and monochromic products.

3) **OM Sleep Mode Requirements**: EPA is proposing a new approach for Functional Adders by only giving allowances for those adders associated with the network and data connects active during the test. EPA is also proposing to decrease OM allowances to reflect technological innovations. Further explanation of the revised OM base power levels and the functional adders proposed in this Draft 1 specification are detailed in the attachment.

4) **Digital Front End (DFE) Efficiency**: EPA is proposing Ready Mode power requirements for Type 1 and Type 2 DFEs using the small scale server power consumption requirements in the V5.2 ENERGY STAR Computer specification. EPA is interested in stakeholder input on current prevalence of network-capable sleep mode in DFEs. Further explanation of the ready mode power requirements for DFEs is provided in the attachment.

5) **Auto-Duplexing Requirements:** Analysis of currently qualified products and additional data shows no sizeable difference between monochrome and color product adoption of auto-duplexing. EPA is proposing to combine monochrome and color auto-duplexing requirements.

6) **Testing Additional Samples**: The requirement to test additional samples of a product when the results of a test fall within 5% or 10% of the requirement has been removed. EPA believes that enhanced verification testing completed by certification bodies obviates the need for this requirement.

7) **Maximum Standby Power Requirement**: EPA is proposing to reduce the maximum Standby Power requirement for OM products from 1.0 W to 0.5 W. Based on analysis of currently qualified products, which reflect most of the US market, the majority of qualified Imaging Equipment that have an Off Mode already meet the proposed 0.5 W limit.

8) **Basic Toxicity and Recyclability Requirements**: Energy efficiency remains the basis for differentiating ENERGY STAR products. By proposing basic toxicity and recyclability criteria, the ENERGY STAR program seeks to avoid associating the label with poor quality or otherwise undesirable product models, thereby preserving the influence of the label in the market. In response to stakeholder comments related to third party certification, EPA has clarified that these requirements are exempt from the ENERGY STAR third-party certification process. Further, also in response to stakeholder comment, EPA added language making clear that the non-energy requirements proposed here are not intended for international adoption. Life cycle analyses will not be considered in this specification.

Stakeholders are requested to provide comments on the Draft 1 specification no later than March 1, 2012. Please email comments to imagingequipment@energystar.gov. All comments received will be posted to the ENERGY STAR Product Development Web site, unless the submitter specifically requests that his or her comments remain confidential.

Imaging Equipment In-Person Meeting to Discuss Draft 1
On March 7, 2012 at 10:00 AM, Eastern Time, EPA will host an in-person stakeholder meeting in Washington, DC, to present details on the revisions made in the Draft 1 Version 2.0 ENERGY STAR Imaging Equipment specification and the data analysis performed to date, as well as address stakeholder questions and concerns regarding the proposed changes. If you wish to attend this meeting, please RSVP to imagingequipment@energystar.gov no later than March 5, 2012.

The exchange of ideas and information between EPA, industry, and other interested parties is critical to the success of ENERGY STAR. To track EPA's progress in revising the ENERGY STAR Imaging Equipment specification and to review comments, please visit the Product Development Web site at www.energystar.gov/RevisedSpecs and click on "Imaging Equipment."

Thank you for your continued support of ENERGY STAR. Please contact me at (202) 343-9046 or kent.christopher@epa.gov with any questions or comments regarding this specification revision.

Sincerely,

Christopher Kent

Christopher Kent, EPA Product Manager
ENERGY STAR Product Specification Development