

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



OFFICE OF  
AIR AND RADIATION

March 16, 2018

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

With this letter, the U.S. Environmental Protection Agency (EPA) is releasing the Draft 1, Version 3.0 ENERGY STAR Imaging Equipment specification and the Draft 2 ENERGY STAR Imaging Equipment Test Method. With market penetration at roughly 100%, stronger ENERGY STAR criteria will capitalize on the potential for additional savings and more effectively differentiate highly energy-efficient imaging equipment products for consumers.

EPA released a Discussion Document focused on testing parameters, paper use assumptions, and scope last year followed by a Draft 1 Test Method, seeking feedback from stakeholders on all of these topics. EPA is now releasing a Draft 1 specification and a Draft 2 test method that reflect this engagement. The Draft 1, Version 3.0 specification incorporates the following key elements:

Professional Imaging Products:

The Agency is aware that there is an ISO Working Group working on developing a test method, which better represents the duty cycle of these products. As such, EPA is using this Draft 1 to solicit feedback on a more tailored approach for these products. This includes proposing a new definition for professional imaging products, based on feedback received from stakeholders, proposing updated test method requirements based on the latest version of the ISO Standard 21632, and addressing additional areas relevant to these products. Once a test method has been developed, interested stakeholders are encouraged to provide data using the new test method so that levels can be developed. This effort may require a subsequent V3.1 revision process depending on the timing of receiving this data. In the interim, EPA is aware that stakeholders may be interested in certifying Professional Products to ENERGY STAR and is proposing to maintain the current structure under which Professional Imaging Products may certify for ENERGY STAR until the alternative test method is finalized and data has been received to set levels based on the new duty cycle.

Scope:

Multiple stakeholders commented in support of removing copiers and fax machines from the ENERGY STAR scope and this change has been implemented. There are currently only 16 products on the ENERGY STAR certified product list within these two categories from two manufacturers and no product has been certified since 2013.

Imaging Equipment Energy Efficiency Criteria:

The ENERGY STAR requirements for TEC products have been revised to better differentiate product in these categories. The top quartile of products was identified in each segment, including for those speeds where most product is sold. The ENERGY STAR On Mode criteria for OM products have not been revised at this time due to the size of the market, the relatively small amount of energy used by these products and the low additional savings available beyond the current ENERGY STAR levels. EPA is proposing to update the default delay time to sleep and maximum machine delay times as noted below. EPA has proposed to incorporate the scanner adder within the base allowances. In addition, comment is sought on any desire to harmonize the OM criteria with the criteria adopted by the European Union (EU) and on the necessity of two adders. The maximum off mode power requirements have been harmonized with the 2019 EU requirements.

#### Maximum Machine Delay Times:

Per stakeholder request, EPA is proposing to harmonize the maximum machine delay times with Germany's Blue Angel requirements for both OM and TEC products.

#### Duplexing:

EPA found that there are substantial potential energy savings related to expanding the duplexing requirements to products with print speeds equal to or greater than 16 ipm (color) and 11 (monochrome). EPA noted that most products in these categories already offer duplexing capabilities, but that there is still a part of the market that does not.

#### Paper Use Assumptions:

As noted during the Draft 1 Test Method discussion, EPA is interested in updating the paper use assumptions to more accurately account for current paper usage. While the assumption will not be perfectly accurate, the proposed value is believed to be much closer to the actual paper consumption value compared to the current assumption. EPA encourages stakeholders to provide additional data that would further inform these assumptions.

#### Test Method

After conducting validation testing, the Network Activity Test has been withdrawn from the test method. Only specific user-initiated requests, such as print jobs or HTTP access to the device scan folders or administrative console, were found to increase the power. However, these activities were not believed to occur outside of working hours when the device is asleep.

#### Comment Submittal

EPA welcomes stakeholder input on the attached Draft 1, Version 3.0 specification. Stakeholders are encouraged to submit any comments to [imagingequipment@energystar.gov](mailto:imagingequipment@energystar.gov) by April 10, 2018. All comments will be posted to the ENERGY STAR Product Development website unless the submitter requests otherwise.

#### Stakeholder Webinar

EPA will host a webinar to answer any questions on this discussion guide on **March 28, 2018 from 1-3 PM Eastern Time**. Please register [here](#) if you plan on attending.

The exchange of ideas and information between EPA, industry, and other interested parties is critical to the success of ENERGY STAR. Specifications and meeting materials will be distributed via email and posted on the ENERGY STAR website. To track EPA's progress on this specification, please visit the product development website at <http://www.energystar.gov/revisedspecs> and navigate to "Imaging."

Please contact me at [Fogle.Ryan@epa.gov](mailto:Fogle.Ryan@epa.gov) or 202-343-9153 or Matt Malinowski, ICF, at [Matt.Malinowski@icf.com](mailto:Matt.Malinowski@icf.com) or (202) 862-2693 with questions or concerns. For any other imaging equipment related questions, please contact [imagingequipment@energystar.gov](mailto:imagingequipment@energystar.gov). Thank you for your continued support of the ENERGY STAR program.

Sincerely,



Ryan Fogle  
EPA Manager, ENERGY STAR for IT and Data Center Products