

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



OFFICE OF  
AIR AND RADIATION

June 29, 2012

Dear Imaging Equipment Partner or Other Interested Stakeholder:

The U.S. Environmental Protection Agency (EPA) welcomes your input on the following Draft 2 Version 2.0 ENERGY STAR® Imaging Equipment specification. Stakeholders are encouraged to submit comments to EPA no later than July 30, 2012.

**Final Test Method**

The U.S. Department of Energy (DOE) has finalized development and validation of the ENERGY STAR Test Method, which outlines the procedures and conditions to be used for testing products under the new Version 2.0 specification. Comments received on the Final Draft Test Method, distributed to stakeholders on February 24, 2012, will be posted to the ENERGY STAR website at [www.energystar.gov/revisedspecs](http://www.energystar.gov/revisedspecs) (click on "Imaging Equipment").

**Changes in Draft 2**

This draft incorporates input received from stakeholders in response to Draft 1, comments expressed at the in person meeting in March, and subsequent discussions with individual stakeholders. Questions and important discussion topics are highlighted in note boxes located throughout the draft specification.

In establishing the revised proposed performance levels, EPA re-analyzed data associated with over 3000 Imaging Equipment models currently available in the market. A masked version of the dataset will be posted to the ENERGY STAR website at [www.energystar.gov/revisedspecs](http://www.energystar.gov/revisedspecs).

The Draft 2 Version 2.0 specification includes the following key changes from the Draft 1 Version 2.0 specification:

1. Product Family: EPA has proposed expanding the scope of allowable variations within the product family.
2. Digital Front End (DFE): EPA has proposed new DFE definitions as well as a new Ready Mode power requirements for DFEs with and without network-capable Sleep Modes.
3. Auto-Duplexing Requirements: EPA has proposed to raise the speed at which auto duplexing is required.
4. Maximum TEC requirements: EPA has updated the data set and returned to the four product subcategories; EPA has also adjusted the maximum TEC requirements to allow for a greater selection of products.
5. OM Sleep Mode Requirements: EPA has updated the data set with the addition of recently qualified models and removed models older than 2010 from the data set. Based on stakeholder input, we also reviewed the impact of proposed functional adders on product qualification. With the inclusion of some additional functional adders, most notably power supplies, and the revision of others, the re-analysis results show the Draft 1 levels were appropriate in most cases. However EPA has proposed some changes to a few product classes, which are detailed in note

boxes in the specification.

6. **Basic Toxicity and Recyclability Requirements:** While energy efficiency remains the basis upon which top performers are selected, EPA addresses attributes related to other aspects of product performance in ENERGY STAR specifications as applicable to ensure that overall product performance is maintained relative to a non-qualifying product. By including additional attributes, the ENERGY STAR program seeks to avoid associating the label with models of poor quality or models with features that are not compatible with broadly held consumer or societal interests, thereby preserving the influence of the label in the market. In response to significant stakeholder concern that placement of toxicity and recyclability requirements in the product eligibility criteria would hinder international harmonization, EPA is proposing that these criteria reside instead in the ENERGY STAR Imaging Equipment Partner Commitments document, which is unique to the US market. As such, EPA has removed section 3.6, Toxicity and Recyclability Requirements, from the eligibility criteria. Further, in response to feedback, EPA notes in the Partner Commitment document that it is the Agency's intention to harmonize with EU RoHS, and that the toxicity and recyclability requirements are not subject to third-party certification.
7. **Effective date:** EPA is proposing to finalize the Version Imaging specification by October 2012 , with an effective date of July 2013.

**Stakeholders are requested to provide comments on the Draft 2 specification no later than July 30, 2012. Please email comments to [imagingequipment@energystar.gov](mailto: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 Webinar to Discuss Draft 2**

On August 15, at 11 AM, Eastern Time, EPA will host a stakeholder webinar to present details on the revisions made in the Draft 2 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](mailto:imagingequipment@energystar.gov) no later than August 6, 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](http://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](mailto:kent.christopher@epa.gov) or Matt Malinowski at (202) 862-2693 or [matt.malinowski@icfi.com](mailto:matt.malinowski@icfi.com) with any questions or comments regarding this specification revision. For questions relating to the test method, please contact Bryan Berringer at (202) 586-0371 or [Bryan.Berringer@ee.doe.gov](mailto:Bryan.Berringer@ee.doe.gov).

Sincerely,



Christopher Kent,  
Product Manager Imaging Equipment  
ENERGY STAR Program