



ENERGY STAR® Product Specification for Imaging Equipment

Eligibility Criteria Draft 2 Version 2.0

1 Following is the Version 2.0 ENERGY STAR Product Specification for Imaging Equipment. A product shall
2 meet all of the identified criteria if it is to earn the ENERGY STAR.

3 **1 DEFINITIONS**

4 A) Product Types:

- 5 1) Printer: A product whose primary function is to generate paper output from electronic input. A
6 printer is capable of receiving information from single-user or networked computers, or other input
7 devices (e.g., digital cameras). This definition is intended to cover products that are marketed as
8 printers, and printers that can be field-upgraded to meet the definition of an MFD.
- 9 2) Scanner: A product whose primary function is to convert paper originals into electronic images
10 that can be stored, edited, converted, or transmitted, primarily in a personal computing
11 environment. This definition is intended to cover products that are marketed as scanners.
- 12 3) Copier: A product whose sole function is to produce paper duplicates from paper originals. This
13 definition is intended to cover products that are marketed as copiers, and upgradeable digital
14 copiers (UDCs).
- 15 4) Facsimile (Fax) Machine: A product whose primary functions are (1) to scan paper originals for
16 electronic transmission to remote units, and (2) to receive electronic transmissions for conversion
17 to paper output. A fax machine may also be capable of producing paper duplicates. Electronic
18 transmission is primarily over a public telephone system, but may also be via a computer network
19 or the Internet. This definition is intended to cover products that are marketed as fax machines.
- 20 5) Multifunction Device (MFD): A product that performs two or more of the core functions of a Printer,
21 Scanner, Copier, or Fax Machine. An MFD may have a physically integrated form factor, or it may
22 consist of a combination of functionally integrated components. MFD copy functionality is
23 considered to be distinct from single-sheet convenience copying functionality sometimes offered
24 by fax machines. This definition includes products marketed as MFDs, and "multi-function
25 products" (MFPs).
- 26 6) Digital Duplicator: A product sold as a fully-automated duplicator system through the method of
27 stencil duplicating with digital reproduction functionality. This definition is intended to cover
28 products that are marketed as digital duplicators.
- 29 7) Mailing Machine: A product whose primary function is to print postage onto mail pieces. This
30 definition is intended to cover products that are marketed as mailing machines.

31 B) Marking Technologies:

- 32 1) Direct Thermal (DT): A marking technology characterized by the burning of dots onto coated print
33 media that is passed over a heated print head. DT products do not use ribbons.
- 34 2) Dye Sublimation (DS): A marking technology characterized by the deposition (sublimation) of dye
35 onto print media as energy is supplied to heating elements.

- 36 3) Electro-photographic (EP): A marking technology characterized by the illumination of a
37 photoconductor in a pattern representing the desired output image via a light source, development
38 of the image with particles of toner using the latent image on the photoconductor to define the
39 presence or absence of toner at a given location, transfer of the toner to the final print media, and
40 fusing to cause the output to become durable. For purposes of this specification, Color EP
41 products simultaneously offer three or more unique toner colors, while Monochrome EP products
42 simultaneously offer one or two unique toner colors. This definition includes Laser, Light Emitting
43 Diode (LED), and Liquid Crystal Display (LCD) illumination technologies.
- 44 4) Impact: A marking technology characterized by the formation of the desired output image by
45 transferring colorant from a “ribbon” to the print media via an impact process. This definition
46 includes Dot Formed Impact and Fully Formed Impact.
- 47 5) Ink Jet (IJ): A marking technology characterized by the deposition of colorant in small drops
48 directly to the print media in a matrix manner. For purposes of this specification, Color IJ products
49 offer two or more unique colorants at one time, while Monochrome IJ products offer one colorant
50 at a time. This definition includes Piezo-electric (PE) IJ, IJ Sublimation, and Thermal IJ. This
51 definition does not include High Performance IJ.
- 52 6) High Performance IJ: An IJ marking technology that includes nozzle arrays that span the width of
53 a page and/or the ability to dry ink on the print media via supplemental media heating
54 mechanisms. High-performance IJ products are used in business applications usually served by
55 electro-photographic marking products.
- 56 7) Solid Ink (SI): A marking technology characterized by ink that is solid at room temperature and
57 liquid when heated to the jetting temperature. This definition includes both direct transfer and
58 offset transfer via an intermediate drum or belt.
- 59 8) Stencil: A marking technology characterized by the transfer of images onto print media from a
60 stencil that is fitted around an inked drum.
- 61 9) Thermal Transfer (TT): A marking technology characterized by the deposition of small drops of
62 solid colorant (usually colored waxes) in a melted/fluid state directly to print media in a matrix
63 manner. TT is distinguished from IJ in that the ink is solid at room temperature and is made fluid
64 by heat.

65 C) Operational Modes:

66 1) On Mode:

- 67 a) Active State: The power state in which a product is connected to a power source and is
68 actively producing output, as well as performing any of its other primary functions.
- 69 b) Ready State: The power state in which a product is not producing output, has reached
70 operating conditions, has not yet entered into any lower-power Modes, and can enter Active
71 State with minimal delay. All product features can be enabled in this state, and the product is
72 able to return to Active State by responding to any potential inputs, including external
73 electrical stimulus (e.g., network stimulus, fax call, or remote control) and direct physical
74 intervention (e.g., activating a physical switch or button).

75 2) Off Mode: The power state that the product enters when it has been manually or automatically
76 switched off but is still plugged in and connected to the mains. This mode is exited when
77 stimulated by an input, such as a manual power switch or clock timer to bring the unit into Ready
78 State. When this state is resultant from a manual intervention by a user, it is often referred to as
79 Manual Off, and when it is resultant from an automatic or predetermined stimuli (e.g., a delay time
80 or clock), it is often referred to as Auto-off.¹

81 3) Sleep Mode: A reduced power state that a product enters either automatically after a period of
82 inactivity (i.e., Default Delay Time), in response to user manual action (e.g., at a user-set time of
83 day, in response to a user activation of a physical switch or button), or in response to external
84 electrical stimulus (e.g., network stimulus, fax call, remote control). For products evaluated under
85 the TEC test method, Sleep Mode permits operation of all product features (including
86 maintenance of network connectivity), albeit with a possible delay to transition into Active State.
87 For products evaluated under the OM test method, Sleep Mode permits operation of a single
88 active network interface, as well as a fax connection if applicable, albeit with a possible delay to
89 transition into Active State.

90 **Note:** EPA has revised the Sleep Mode definition to note the appropriate network connections intended to
91 be active during Sleep Mode.

92 4) Standby: The lowest power consumption state which cannot be switched off (influenced) by the
93 user and that may persist for an indefinite time when the product is connected to the main
94 electricity supply and used in accordance with the manufacturer's instructions.^{1,2} Standby is the
95 product's minimum power state. For Imaging Equipment products addressed by this specification,
96 the "Standby" Mode usually corresponds to Off Mode, but may correspond to Ready State or
97 Sleep Mode. A product cannot exit Standby and reach a lower power state unless it is physically
98 disconnected from the main electricity supply as a result of manual manipulation.

99 D) Media Format:

100 1) Large Format: Products designed for A2 media and larger, including those designed to
101 accommodate continuous-form media greater than or equal to 406 mm wide. Large-format
102 products may also be capable of printing on standard-size or small-format media.

103 2) Standard Format: Products designed for standard-sized media (e.g., Letter, Legal, Ledger, A3,
104 A4, B4), including those designed to accommodate continuous-form media between 210 mm and
105 406 mm wide. Standard-size products may also be capable of printing on small-format media.

106 3) Small Format: Products designed for media sizes smaller than those defined as Standard (e.g.,
107 A6, 4"x6", microfilm), including those designed to accommodate continuous-form media less than
108 210 mm wide.

109 4) Continuous Form: Products that do not use a cut-sheet media format, and that are designed for
110 applications such as printing of bar codes, labels, receipts, banners, and engineering drawings.
111 Continuous form products can be of small, standard, or large format.

112 E) Additional Terms:

113 1) Automatic Duplexing: The capability of a copier, fax machine, MFD, or printer to produce images
114 on both sides of an output sheet, without manual manipulation of output as an intermediate step.
115 A product is considered to have automatic duplexing capability only if all accessories needed to
116 produce duplex output are included with the product upon shipment.

1 For the purposes of this specification "mains" or the "main electricity supply" refers to the input power source, including a dc power supply for products that operate solely off dc power.

2 IEC 62301 Ed. 1.0 – Household electrical appliances – Measurement of standby power.

- 117 2) Data Connection: A connection that permits the exchange of information between the imaging
118 product and one external powered device or storage medium.
- 119 3) Default Delay Time: The time set by the manufacturer prior to shipping that determines when the
120 product will enter a lower-power Mode (e.g., Sleep, Auto-off) following completion of its primary
121 function.
- 122 4) Digital Front-end (DFE): A functionally-integrated server that hosts other computers and
123 applications and acts as an interface to imaging equipment. A DFE provides greater functionality
124 to the imaging product.

125 a) A DFE offers three or more of the following advanced features:

- 126 i. Network connectivity in various environments;
127 ii. Mailbox functionality;
128 iii. Job queue management;
129 iv. Machine management (e.g., waking the imaging equipment from a reduced power
130 state);
131 v. Advanced graphic user-interface (UI);
132 vi. Ability to initiate communication with other host servers and client computers (e.g.,
133 scanning to email, polling remote mailboxes for jobs); or
134 vii. Ability to post-process pages (e.g., reformatting pages prior to printing).

135 b) Type 1 DFE: A DFE that draws its dc power from its own ac power supply (internal or
136 external), which is separate from the power supply that powers the imaging equipment. This
137 DFE may draw its ac power directly from a wall outlet, or it may draw it from the ac power
138 associated with the imaging product's internal power supply. A third party Type 1 DFE must
139 be sold in conjunction with the product it supports in order to be covered by this specification.

140 c) Type 2 DFE: A DFE that draws its dc power from the same power supply as the imaging
141 equipment with which it operates. Type 2 DFEs must have a board or assembly with a
142 separate processing unit that is capable of initiating activity over the network and can be
143 physically removed, isolated, or disabled using common engineering practices to allow power
144 measurements to be made.

145 **Note:** EPA has added the substance of Type 3 DFE definition to the Type 1 definition. With this change,
146 EPA intends to make clear that the ENERGY STAR program does not cover stand alone DFEs, only
147 DFEs that are a component to the imaging product that are eligible for qualification.

148 5) Network Connection: A connection that permits the exchange of information between the imaging
149 product and one or more external powered devices.

150 6) Functional Adder: A data or network interface or other component that adds functionality to the
151 marking engine of an imaging equipment product and provides a power allowance when qualifying
152 products according to the OM method.

153 7) Operational Mode (OM): For the purposes of this specification, a method of comparing product
154 energy performance via an evaluation of power (measured in watts) in various operating states, as
155 specified in Section 9 of the ENERGY STAR Imaging Equipment test method.

156 8) Typical Electricity Consumption (TEC): For the purposes of this specification, a method of
157 comparing product energy performance via an evaluation of typical electricity consumption
158 (measured in kilowatt-hours) during normal operation over a specified period of time, as specified
159 in Section 8 of the ENERGY STAR Imaging Equipment test method.

- 160 9) Marking Engine: The fundamental engine of an imaging product that drives image production. A
161 marking engine relies upon functional adders for communication ability and image processing.
162 Without functional adders and other components, a marking engine cannot acquire image data for
163 processing and is non-functional.
- 164 10) Base Product: The most fundamental configuration of a particular Product Model, which
165 possesses the minimum number of functional adders available. Optional components and
166 accessories are not considered part of a base product.
- 167 11) Accessory: A piece of peripheral equipment that is not necessary for the operation of the Base
168 Product, but that may be added before or after shipment in order to add functionality. An
169 accessory may be sold separately under its own model number, or sold with a base product as
170 part of a package or configuration.
- 171 12) Product Model: An imaging equipment product that is sold or marketed under a unique model
172 number or marketing name. A product model may be comprised of a base product or a base
173 product plus accessories.

174 **Note:** EPA has removed the definition of representative model, since it is detailed in Section 4.2.1.

- 175 13) Product Family: A group of product models that are (1) made by the same manufacturer, (2)
176 subject to the same ENERGY STAR qualification criteria, and (3) of a common basic design.
177 Product models within a family differ from each other according to one or more characteristics or
178 features that either (1) have no impact on product performance with regard to ENERGY STAR
179 qualification criteria, or (2) are specified herein as acceptable variations within a product family.
180 For Imaging Equipment, acceptable variations within a product family include:
- 181 a) Color,
- 182 b) Housing,
- 183 c) Input or output paper-handling accessories,
- 184 d) Electronic components not associated with the marking engine of the Imaging Equipment
185 product.

186 **Note:** EPA has removed “input voltage and frequency” from the list of allowable variations to prevent
187 conflict with international market qualification, as required in Section 4.3.

188
189 Additionally, EPA has increased the scope of allowable variation within a product family to include
190 electronic components that are not associated with the marking engine of the Imaging Equipment Product.
191 As noted in Section 4.2.1.ii, products are tested and qualified with the most featured and highest energy
192 using configuration within a family. Any changes or additions of electronic components in the system that
193 lead to greater power consumption than the qualified representative model will require requalification.

194 **2 SCOPE**

195 **2.1 Included Products**

- 196 2.1.1 Commercially-available products that meet one of the Imaging Equipment definitions in Section 1
197 and are capable of being powered from (1) a wall outlet, (2) a data or network connection, or (3)
198 both a wall outlet and a data or network connection, are eligible for ENERGY STAR qualification,
199 with the exception of products listed in Section 2.2.

200 2.1.2 An imaging equipment product must further be classified as either “TEC” or “OM” in Table 1,
 201 below, depending on the method of ENERGY STAR evaluation.

202 **Note:** EPA review of market conditions and the role ENERGY STAR plays in the market supports retaining
 203 scanners and fax machines in the scope of this specification. Therefore, both product types have been
 204 retained in Draft 2.

206 **Table 1: Evaluation Methods for Imaging Equipment**

Equipment Type	Media Format	Marking Technology	ENERGY STAR Evaluation Method
Copier	Standard	DT, DS, EP, SI, TT	TEC
	Large	DT, DS, EP, SI, TT	OM
Digital Duplicator	Standard	Stencil	TEC
Fax Machine	Standard	DT, DS, EP, SI, TT	TEC
		IJ	OM
Mailing Machine	All	DT, EP, IJ, TT	OM
Multifunction Device (MFD)	Standard	High Performance IJ, DT, DS, EP, SI, TT	TEC
		IJ, Impact	OM
Printer	Standard	High Performance IJ, DT, DS, EP, SI, TT	TEC
		IJ, Impact	OM
	Large or Small	DT, DS, EP, Impact, IJ, SI, TT	OM
	Small	High Performance IJ	TEC
Scanner	All	N/A	OM

207
 208 **Note:** Stakeholders have expressed concern about the applicability of the TEC test method to small-
 209 format high-performance ink jet printers. In the test method, small-format products can be tested under the
 210 TEC test method. EPA believes that small format high performance inkjet printers should be treated and
 211 tested using the TEC test method, as it is consistent with our approach for testing products that are in
 212 constant use rather than those products that remain idle for long periods of time. EPA welcomes further
 213 stakeholder feedback on this approach and the test method applicability.

214 **2.2 Excluded Products**

215 2.2.1 Products that are covered under other ENERGY STAR product specifications are not eligible for
 216 qualification under this specification. The list of specifications currently in effect can be found at
 217 www.energystar.gov/products.

218 2.2.2 Products that satisfy one or more of the following conditions are not eligible for ENERGY STAR
 219 qualification under this specification:

- 220 i. Products that are designed to operate directly on three-phase power.

221 **3 QUALIFICATION CRITERIA**

222 **3.1 Significant Digits and Rounding**

- 223 3.1.1 All calculations shall be carried out with directly measured (unrounded) values.
- 224 3.1.2 Unless otherwise specified, compliance with specification limits shall be evaluated using directly
225 measured or calculated values without any benefit from rounding.
- 226 3.1.3 Directly measured or calculated values that are submitted for reporting on the ENERGY STAR
227 website shall be rounded to the nearest significant digit as expressed in the corresponding
228 specification limit.

229 **3.2 General Requirements**

230 3.2.1 External Power Supply (EPS):

- 231 i. If the product is shipped with a single-voltage EPS, the EPS shall meet the level V
232 performance requirements under the International Efficiency Marking Protocol and include the
233 level V marking. Additional information on the Marking Protocol is available at
234 www.energystar.gov/powersupplies.
235
- 236 • Single-output EPS shall meet level V requirements when tested using the Test Method for
237 Calculating the Energy Efficiency of Single-Voltage External Ac-Dc and Ac-Ac Power
238 Supplies, Aug. 11, 2004.
239
 - 240 • Multi-output EPS shall meet the level V requirements when tested using the *EPRI 306*
241 *Generalized Internal Power Supply Efficiency Test Protocol, Rev. 6.6*. Power Supply data
242 generated using Rev. 6.4.2 (as required in Version 1.2) is acceptable provided the test
243 was conducted prior to the effective date of Version 2.0.
244

245 **Note:** EPA has clarified how single-output and multi-output EPS shall be tested for Imaging Equipment.

246 Additionally, EPA has clarified that legacy EPS data generated using the revision of the test protocol
247 incorporated in Version 1.2 will be accepted if the data was generated prior to Version 2.0 taking effect.
248 Such an approach allows Partners to avoid unnecessary retesting, and EPA believes that the changes
249 implemented in the test protocol do not impact the consistency of the data requested in this specification.
250

- 251 3.2.2 Additional Cordless Handset: Fax machines and MFDs with fax capability that are sold with
252 additional cordless handsets shall use an ENERGY STAR qualified handset, or one that meets
253 the ENERGY STAR Telephony specification when tested to the ENERGY STAR test method on
254 the date the imaging product is qualified as ENERGY STAR. The ENERGY STAR specification
255 and test method for telephony products may be found at www.energystar.gov/products.

- 256 3.2.3 Functionally Integrated MFD: If an MFD consists of a set of functionally integrated components
257 (i.e., the MFD is not a single physical device), the sum of the measured energy or power
258 consumption for all components shall be less than the relevant MFD energy or power
259 consumption requirements for ENERGY STAR qualification.

260 **Note:** EPA has determined that the development of an acceptable wakeup test was beyond the timeline
261 for the development of the ENERGY STAR test method. As such, EPA is electing not to address wake up
262 in this specification revision.

263 3.2.4 **DFE Requirements:** The Typical Electricity Consumption of a Type 1 or Type 2 DFE sold with an
 264 Imaging Equipment product (TEC_{DFE}) shall be calculated using Equation 1 for a DFE without sleep
 265 mode or Equation 2 for a DFE with sleep mode. The resulting TEC_{DFE} value shall be less than or
 266 equal to the maximum TEC_{DFE} requirement specified in Table 2 for the given DFE type.

- 267 i. The TEC value or ready mode power of a DFE that meets the maximum TEC_{DFE} requirements
 268 should be excluded or subtracted from the TEC energy and OM power measurements of the
 269 Imaging Equipment product as appropriate.
 270 ii. Section 3.3.2i provides further detail on subtracting TEC_{DFE} values from TEC products;
 271 iii. Section 3.4.2 provides further detail for excluding DFEs from OM Sleep and Standby levels.

272 **Equation 1: TEC_{DFE} Calculation for Digital Front Ends without Sleep Mode**

$$TEC_{DFE} = \frac{168 \times P_{DFE_READY}}{1000}$$

274
 275 *Where:*

- 276 • TEC_{DFE} is the typical weekly energy consumption for DFEs, expressed in
 277 kilowatt-hours (kWh) and rounded to the nearest 0.1 kWh;
 278 • P_{DFE_READY} is ready mode power measured in the test procedure in watts.

279 **Equation 2: TEC_{DFE} Calculation for Digital Front Ends with Sleep Mode**

$$TEC_{DFE} = \frac{(45 \times P_{DFE_READY}) + (123 \times P_{DFE_SLEEP})}{1000}$$

281
 282 *Where:*

- 283 • TEC_{DFE} is the typical weekly energy consumption for DFEs, expressed in
 284 kilowatt-hours (kWh) and rounded to the nearest 0.1 kWh;
 285 • P_{DFE_READY} is ready mode power measured in the test procedure in watts.
 286 • P_{DFE_SLEEP} is sleep mode power measured in the test procedure in watts.

287 **Note:** As shown above in Equation 1, for products with no Sleep Mode, the Ready Mode power measured
 288 in the test method is multiplied by 168 hours to obtain the TEC_{DFE} value for a one week period.
 289
 290 As shown above in Equation 2, for products with a functional Sleep Mode, the Ready Mode power
 291 measured in the test method is multiplied by 45 hours to represent 5 business days during a one week
 292 period. The remainder of time in the week, 123 hours, is multiplied by the Sleep Mode power measured in
 293 the test method to obtain the total TEC_{DFE} value for one week. This approach is intended to meet
 294 stakeholder requests from Draft 1 to address Sleep Mode capable DFEs using a weekly consumption
 295 calculation. Using this formula rewards implementation of energy saving Sleep Mode in DFEs.

296 **Table 2: Maximum TEC_{DFE} Requirements for Type 1 and Type 2 DFEs**

DFE Category	Category Description	Maximum TEC_{DFE} (kWh/week, rounded to the nearest 0.1 kWh/week for reporting)	
		Type 1 DFE	Type 2 DFE
A	All DFEs that do not meet the definition of Category B will be considered under Category A for ENERGY STAR qualification.	10.9	9.2

DFE Category	Category Description	Maximum TEC _{DFE} (kWh/week, rounded to the nearest 0.1 kWh/week for reporting)	
		Type 1 DFE	Type 2 DFE
B	To qualify under Category B DFEs must have: 2 or more physical CPUs or 1 CPU and ≥ 1 discrete graphic processing units (GPUs)	22.7	19.3

297

298 **Note:** Ready mode requirements have been converted into maximum TEC_{DFE} requirements to recognize
 299 DFEs that may have a higher ready mode power, but implement a functional network capable Sleep
 300 Mode, allowing lower overall power consumption over the period of a week.

301
 302 EPA intends to continue to treat lower functionality DFEs similarly to small scale servers in the ENERGY
 303 STAR 5.2 Computer specification, as they have similar hardware and software functionality. EPA is aware
 304 that higher performance DFEs are necessary for high speed color printing applications, and that these
 305 systems compare to high-end desktops rather than small scale servers. Using data from the ENERGY
 306 STAR Version 6.0 Draft Computer specification revised desktops dataset, EPA has developed new
 307 requirements for DFEs that incorporate multiple physical CPUs, or a CPU and GPU combination, for
 308 greater functionality. The new requirements also account for increased memory and HDD requirements for
 309 higher performance DFEs.

310
 311 All desktop and small scale server products analyzed from the revised computer dataset contain multicore
 312 CPU technology—single core products are no longer represented in the current desktop and small scale
 313 server market offerings. Therefore differentiation between single core and multicore has been removed in
 314 this Draft 2.

315
 316 Finally, EPA also plans to present the TEC_{DFE} in kilowatt-hours/year (based on 8760 hours per year, and
 317 rounded to the third significant digit) on the qualified products list (QPL). Although kilowatt-hours/week will
 318 continue to be used for qualification, kilowatt-hours/year may be displayed on the qualified products list for
 319 easier comparison to other ENERGY STAR products, which typically express their energy consumption in
 320 annual terms.

321

322 3.3 Requirements for Typical Electricity Consumption (TEC) Products

323 3.3.1 Automatic Duplexing Capability:

- 324 i. For all copiers, MFDs, and printers subject to the TEC test method, automatic duplexing
 325 capability shall be present at the time of purchase as specified in Table 3.

326 **Table 3: Automatic Duplexing Requirements for**
 327 **all TEC Copiers, MFDs, and Printers**

Monochrome Product Speed, <i>s</i> , as Calculated in the Test Method (ipm)	Automatic Duplexing Requirement
$s \leq 26$	None
$s > 26$	Integral to the base product

328

Note: Stakeholders noted that for some lower speed products, automatic duplexing is not practical and may have the potential effect of discouraging lower-cost ENERGY STAR qualified printers, EPA recognizes this concern and as such has revised the proposed automatic duplexing requirement to apply to all TEC Copiers, MFDs, and Printers whose monochrome print speed is greater than 26 ipm.

Note: EPA is proposing revision to the following guidance in a Version 1.0 clarification memo from 2007:

A partner may label their base product (that meets the energy efficiency requirements associated with the ENERGY STAR Version 1.0 Imaging Specification - and may or may not be bundled with a duplex tray). The partner must, in this case, make clear in their product literature, on their Web site, and in institutional sales literature that although the product meets the ENERGY STAR energy efficiency requirements, the product only fully qualifies for ENERGY STAR when bundled with or used with a duplex tray. EPA asks that partners use the following language to convey this message to customers:

"Achieves ENERGY STAR energy savings; product fully qualifies when packaged with (or used with) a duplex tray."

Due to the maturation of the printer market, EPA proposed to remove this allowance to ensure consistency of the program requirements and avoid consumers misunderstanding caused by associating ENERGY STAR with higher speed non-duplexing products. All Imaging Equipment products must meet the automatic duplexing requirements in Table 3 as shipped to be labeled as ENERGY STAR.

3.3.2 Typical Electricity Consumption: Calculated Typical Electricity Consumption (TEC) per Equation 3 or Equation 4 shall be less than or equal to the Maximum TEC Requirement (TEC_{MAX}) specified in Table 4, to the nearest 0.1 kilowatt-hour.

- i. For imaging products with a Type 2 DFE that meet the Type 2 DFE maximum TEC_{DFE} requirement found in Table 2., the energy consumption of the DFE, calculated per the example below, should be excluded when comparing the product's measured TEC value to TEC_{MAX}. The DFE shall not interfere with the ability of the imaging product to enter or exit its lower-power modes. The energy use of a DFE can only be excluded if it meets the DFE definition in Section 1 and that has a separate processing unit that is capable of initiating activity over the network, may be subtracted from the measured DFE.

Example: A printer's total TEC result is 24.5 kWh/week and its TEC_{DFE} value calculated in Section 3.2.4 is 9.0 kWh/week. The TEC_{DFE} value is subtracted from the tested TEC value: 24.5 kWh/week – 9.0 kWh/week = 15.5 kWh/week. 15.5 kWh/week is then compared to the relevant TEC_{MAX}.

- ii. For printers, fax machines, digital duplicators with print capability, and MFDs with print capability, TEC shall be calculated per Equation 3.

Equation 3: TEC Calculation for Printers, Fax Machines, Digital Duplicators with Print Capability, and MFDs with Print Capability

$$TEC = 5 \times \left[E_{JOB_DAILY} + (2 \times E_{FINAL}) + [24 - (N_{JOBS} \times 0.25) - (2 \times t_{FINAL})] \times \frac{E_{SLEEP}}{t_{SLEEP}} \right] + 48 \times \frac{E_{SLEEP}}{t_{SLEEP}},$$

Where:

- TEC is the typical weekly energy consumption for printers, fax machines, digital duplicators with print capability, and MFDs with print capability, expressed in kilowatt-hours (kWh) and rounded to the nearest 0.1 kWh;
- E_{JOB_DAILY} is the daily job energy, as calculated per Equation 5, in kWh;

- 376 • E_{FINAL} is the final energy, as measured in the test procedure, converted to
- 377 kWh;
- 378 • N_{JOBS} is the number of jobs per day, as calculated in the test procedure,
- 379 • t_{FINAL} is the final time to Sleep, as measured in the test procedure, converted
- 380 to hours;
- 381 • E_{SLEEP} is the Sleep energy, as measured in the test procedure, converted to
- 382 kWh; and
- 383 • t_{SLEEP} is the Sleep time, as measured in the test procedure, converted to hours.

384 iii. For copiers, digital duplicators without print capability, and MFDs without print capability, TEC
 385 shall be calculated per Equation 4.

**Equation 4: TEC Calculation for Copiers, Digital Duplicators without Print Capability,
 and MFDs without Print Capability**

$$388 \quad TEC = 5 \times \left[E_{JOB_DAILY} + (2 \times E_{FINAL}) + [24 - (N_{JOBS} \times 0.25) - (2 \times t_{FINAL})] \times \frac{E_{AUTO}}{t_{AUTO}} \right] + 48 \times \frac{E_{AUTO}}{t_{AUTO}},$$

389 Where:

- 390 • TEC is the typical weekly energy consumption for copiers, digital duplicators
- 391 without print capability, and MFDs without print capability, expressed in
- 392 kilowatt-hours (kWh) and rounded to the nearest 0.1 kWh;
- 393 • E_{JOB_DAILY} is the daily job energy, as calculated per Equation 5, in kWh;
- 394 • E_{FINAL} is the final energy, as measured in the test procedure, converted to
- 395 kWh;
- 396 • N_{JOBS} is the number of jobs per day, as calculated in the test procedure;
- 397 • t_{FINAL} is the final time to Sleep, as measured in the test procedure, converted
- 398 to hours;
- 399 • E_{AUTO} is the Auto-off energy, as measured in the test procedure, converted to
- 400 kWh; and
- 401 • t_{AUTO} is the Auto-off time, as measured in the test procedure, converted to
- 402 hours.

403 iv. Daily Job Energy shall be calculated per Equation 5.

Equation 5: Daily Job Energy Calculation for TEC Products

$$405 \quad E_{JOB_DAILY} = (2 \times E_{JOB1}) + \left((N_{JOBS} - 2) \times \frac{E_{JOB2} + E_{JOB3} + E_{JOB4}}{3} \right),$$

406 Where:

- 407 • E_{JOB_DAILY} is the daily job energy, expressed in kilowatt-hours (kWh);
- 408 • E_{JOBi} is the energy of the i^{th} job, as measured in the test procedure, converted
- 409 to kWh; and
- 410 • N_{JOBS} is the number of jobs per day, as calculated in the test procedure.
- 411

Table 4: Maximum TEC Requirement

Color Capability	Monochrome Product Speed, s , as Calculated in the Test Method (ipm)	TEC _{MAX} (kWh/week, to the nearest 0.1 kWh/week for reporting)
Monochrome Non-MFD	$s \leq 5$	0.3
	$5 < s \leq 20$	$(s \times 0.04) + 0.1$
	$20 < s \leq 30$	$(s \times 0.06) - 0.3$
	$30 < s \leq 40$	$(s \times 0.11) - 1.8$
	$40 < s \leq 65$	$(s \times 0.16) - 3.8$
	$65 < s \leq 90$	$(s \times 0.2) - 6.4$
	$s > 90$	$(s \times 0.55) - 37.9$
Monochrome MFD	$s \leq 5$	0.4
	$5 < s \leq 30$	$(s \times 0.07) + 0.05$
	$30 < s \leq 50$	$(s \times 0.11) - 1.15$
	$50 < s \leq 80$	$(s \times 0.25) - 8.15$
	$s > 90$	$(s \times 0.6) - 36.15$
Color Non-MFD	$s \leq 10$	1.3
	$10 < s \leq 15$	$(s \times 0.06) + 0.7$
	$15 < s \leq 30$	$(s \times 0.15) - 0.65$
	$30 < s \leq 75$	$(s \times 0.2) - 2.15$
	$s > 75$	$(s \times 0.7) - 39.65$
Color MFD	$s \leq 10$	1.5
	$10 < s \leq 15$	$(s \times 0.1) + 0.5$
	$15 < s \leq 30$	$(s \times 0.13) + 0.05$
	$30 < s \leq 70$	$(s \times 0.2) - 2.05$
	$70 < s \leq 80$	$(s \times 0.7) - 37.05$
	$s > 80$	$(s \times 0.75) - 41.05$

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414 **Note:** EPA has reverted to the current practice of separating the TEC requirement for MFD and non-MFD
 415 products to create the most accurate levels possible across all product categories. The adjustments to
 416 proposed levels reflect qualified data up through March 15, 2012. Pass/fail analysis was performed on the
 417 new levels, based on bins of product speed (ipm) for each TEC category.

418

419 At the proposed TEC levels for the four product classes, EPA expects a broad selection of models from
 420 multiple manufacturers to be eligible for the ENERGY STAR. EPA notes that qualification rates, based on
 421 the EPA revised data set, are somewhat larger than normal due to some uncertainty around the impact of
 422 the revised test method.

423 Lastly, EPA intends to display the TEC values of ENERGY STAR qualified Imaging Equipment in both the
 424 kilowatt-hours per year and kilowatt-hours per week on the qualified products list (QPL) for easier
 425 comparison to other ENERGY STAR products, which typically express energy consumption in annual
 426 terms.

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428 3.3.3 Additional Test Results Reporting Requirements: Recovery time (Active 1 time) and Default Delay
 429 Time shall be reported for all products test using the TEC test method.

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431 **Note:** Since recovery time (Active1 time) and Default Delay Time to Sleep are useful to consumers and
432 potentially a useful parameter for evaluating the impact of the Version 2.0 requirements on usability, EPA
433 proposes to require reporting of both recovery time (Active1 time) and Default Delay Time to Sleep for all
434 TEC products.

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436 Additionally, EPA proposes including this information on the Version 2.0 Qualified Product List (QPL).
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438 3.4 Requirements for Operational Mode (OM) Products

439 3.4.1 Multiple Sleep Modes: If a product is capable of automatically entering multiple successive Sleep
440 Modes, the same Sleep Mode shall be used to determine qualification under the default delay time
441 to sleep requirements specified in Section 3.4.3 and the Sleep Mode power consumption
442 requirements specified in Section 3.4.4.

443 3.4.2 DFE Requirements: For imaging products with a functionally-integrated DFE that relies on the
444 imaging product for its power, and that meets the appropriate maximum TEC_{DFE} requirement
445 found in Table 2, the ready mode power of the DFE, measured in the test method, should be
446 excluded when comparing the product's measured Sleep Mode power to the combined marking-
447 engine and functional-adder criteria limits below and when comparing the measured Standby
448 Mode power to the Standby criteria limits below.

- 449 i. The DFE must not interfere with the ability of the imaging product to enter or exit its lower-
450 power modes.
- 451 ii. In order to take advantage of this exclusion, the DFE must meet the definition in Section 1 and
452 be a separate processing unit that is capable of initiating activity over the network.

453 3.4.3 Default Delay Time: Measured Default Delay Time to Sleep (t_{SLEEP}) shall be less than or equal to
454 the Maximum Default Delay Time to Sleep (t_{SLEEP_MAX}) requirement specified in Table 5, subject to
455 the following conditions:

- 456 i. The maximum machine delay time shall be less than or equal to 4 hours, which is set by the
457 manufacturer. This maximum machine delay time can be adjusted by the user to a value less
458 than or equal to 4 hours.
- 459 ii. When reporting data and qualifying products that can enter Sleep Mode in multiple ways,
460 partners should reference a Sleep level that can be reached automatically. If the product is
461 capable of automatically entering multiple, successive Sleep levels, it is at the manufacturer's
462 discretion which of these levels is used for qualification purposes; however, the default-delay
463 time provided must correspond with whichever level is used.
- 464 iii. Default Delay Time does not apply to OM products that can meet sleep mode requirements in
465 ready mode.

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Table 5: Maximum Default Delay Time to Sleep for OM Products

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Product Type	Media Format	Monochrome Product Speed, <i>s</i> , as Calculated in the Test Method (ipm or mppm)	Default Delay Time to Sleep (minutes)
Copier	Large	$s \leq 30$	30
		$s > 30$	60
Fax Machine	Small or Standard	All	5
MFD	Small or Standard	$s \leq 10$	15
		$10 < s \leq 20$	30
		$s > 20$	60
	Large	$s \leq 30$	30
$s > 30$		60	
Printer	Small or Standard	$s \leq 10$	5
		$10 < s \leq 20$	15
		$20 < s \leq 30$	30
		$s > 30$	60
	Large	$s \leq 30$	30
$s > 30$		60	
Scanner	All	All	15
Mailing Machine	All	$s \leq 50$	20
		$50 < s \leq 100$	30
		$100 < s \leq 150$	40
		$s > 150$	60

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3.4.4 Sleep Mode Power Consumption: Measured Sleep Mode power consumption (P_{SLEEP}) shall be less than or equal to the maximum Sleep Mode power consumption requirement (P_{SLEEP_MAX}) determined per Equation 6, subject to the following conditions:

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- i. Only those interfaces that are present and used during the test, including any fax interface, may be considered functional adders.
- ii. Product functionality offered through a DFE shall not be considered a functional adder.
- iii. A single interface that performs multiple functions may be counted only once.
- iv. Any interface that meets more than one interface type definition shall be classified according to the functionality used during the test.
- v. For products that meet the Sleep Mode power requirement in Ready State, no further automatic power reductions are required to meet Sleep Mode requirements.

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Note: EPA received stakeholder feedback that OM products that have no distinct Sleep Mode but meet the maximum Standby requirements should not be allowed to qualify. EPA wishes to clarify its proposal: All OM products shall meet the Sleep and Standby power requirements; however, they do not necessarily need to meet them in Sleep Mode. EPA has seen numerous products that do not have a distinct Sleep Mode, but can nonetheless meet the Sleep Mode requirement (and sometimes even the Standby Requirement) in Ready Mode.

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More generally, an Imaging Equipment product can meet a power requirement pertaining to one mode while operating in another mode, as long as the other mode has more functions available and it can still meet the power limit of the original requirement.

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Equation 6: Calculation of Maximum Sleep Mode Power Consumption Requirement for OM products

$$P_{SLEEP_MAX} = P_{MAX_BASE} + \sum_1^n Adder_{INTERFACE} + \sum_1^m Adder_{OTHER}$$

Where:

- P_{SLEEP_MAX} is the maximum Sleep Mode power consumption requirement, expressed in watts (W), and rounded to the nearest 0.1 watt;
- P_{MAX_BASE} is the maximum Sleep Mode power allowance for the base marking engine, as determined per Table 6, in watts;
- $Adder_{INTERFACE}$ is the power allowance for the interface functional adders used during the test, including any fax capability and as selected by the manufacturer from Table 7, in watts;
- n is the number of allowances claimed for interface functional adders used during the test, including any fax capability and is less than or equal to 2
- $Adder_{OTHER}$ is the power allowance for any non-interface functional adders in use during the test, as selected by the manufacturer from Table 7, in watts; and
- m is the number of allowances claimed for any non-interface functional adders in use during the test.

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Table 6: Sleep Mode Power Allowance for Base Marking Engine

Product Type	Media Format	Marking Technology				P_{MAX_BASE} (watts)
		Impact	Ink Jet	All Other	Not Applicable	
Copier	Large			x		8.2
Fax Machine	Standard		x			0.6
Mailing Machine	N/A		x	x		5.0
MFD	Standard	x	x			0.6
	Large		x			4.9
Printer	Small	x	x	x		8.2
	Standard	x	x			4.0
	Large	x		x		0.6
Scanner	Any		x			2.5
					x	4.9
					x	2.5

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Note: Following the publication of the Draft 1 Specification in February 2012 and the stakeholder face-to-face meeting in March, stakeholders raised the following concerns with the data analyzed in developing the Draft 1 Operational Mode (OM) sleep mode requirements. Concerns, responded to in full in the Draft 1 comment response document, included such topics as the age of products within the dataset, viability of some data points (e.g., Sleep Mode exceeded Ready Mode), and the unequal reductions in base allowances for various product types.

To address these concerns, EPA reviewed and revised the data set by adding in some recently qualified products (as of April 12, 2012), removing models older than 2010, and removing models with uncertain data (i.e., qualified models whose Sleep Mode power was greater than Ready Mode power, and models with no Sleep Mode value at 115 V).

527 Analysis of this revised dataset supported EPA's Draft 2 proposal to revert back to current practice of
 528 allowing a functional adder for larger power supplies, which serve as a proxy for additional functionality
 529 beyond what is captured by the adders. EPA considered functional adders, including the adder for power
 530 supplies, when analyzing the revised data set and developing the Draft 2 proposed base allowances. EPA
 531 also evaluated the impacts of DFEs on Imaging Equipment product qualification rates. The analysis did
 532 not find that the levels proposed in Draft 1 discriminated against products with DFEs. Thus, EPA did not
 533 adjust levels based on presence of a DFE. Lastly, EPA considered adjustments to many base allowances
 534 using the revised dataset. The resulting levels are summarized below:

OM Category	Version 1.2 Base	Draft 1	Draft 2	Rationale for change in Draft 2
Large Non Ink Jet MFD	30 W	7.4	8.2	Increase. Draft 2 analysis resulted in a higher base allowance once new data were factored in.
Standard Format IJ	1.4 W	0.60	0.60	No change. The new data and power supply adder did not call for a change to the base allowance.
Large Ink Jet Printer and MFD	15 W	4.9	4.9	No change. The new data and power supply adder did not call for a change to the base allowance.
Mailing Machines	7 W	5.6	5.0	Decrease. Draft 2 analysis resulted in lower energy base allowance once new data were factored in.
Small Format Printer	9 W	9.0	4.0	Decrease. Our qualified data represents a small part of the market, the qualified product models are able to meet this revised base allowance, so not a significant change.
Standard Format Impact Printers	4.6 W	2.3	0.60	Decrease. Draft 2 analysis resulted in lower energy base allowance once new data and power supply adder were factored in.
Scanners	4.3 W	2.7	2.5	Decrease. Draft 2 analysis excluded models with power supplies ≤ 10 W (potential USB) and using only qual models (limited market share) resulted in slight decrease .
Large Non-Ink Jet Printer	14 W	2.5	2.5	No change. The new data and power supply adder did not call for a change to the base allowance.

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Table 7: Sleep Mode Power Allowances for Functional Adders

Adder Type	Connection Type	Max. Data Rate, r (Mbit/second)	Details	Functional Adder Allowance (watts)
Interface	Wired	$r < 20$	Includes: USB 1.x, IEEE 488, IEEE 1284/Parallel/ Centronics, RS232	0.2
		$20 \leq r < 500$	Includes: USB 2.x, IEEE 1394/ FireWire/i.LINK, 100Mb Ethernet	0.4
		$r \geq 500$	Includes: USB 3.x,1G Ethernet	0.5

Adder Type	Connection Type	Max. Data Rate, <i>r</i> (Mbit/second)	Details	Functional Adder Allowance (watts)
		Any	Includes: Flash memory-card/smart-card readers, camera interfaces, PictBridge	0.2
	Fax Modem	Any	<u>Applies to MFDs only.</u>	0.2
	Wireless, Radio-frequency (RF)	Any	Includes: Bluetooth, 802.11	2.0
	Wireless, Infrared (IR)	Any	Includes: IrDA.	0.1
Cordless Handset	N/A	N/A	Capability of the imaging product to communicate with a cordless handset. Applied only once, regardless of the number of cordless handsets the product is designed to handle. Does not address the power requirements of the cordless handset itself.	0.8
Memory	N/A	N/A	Applies to the internal capacity available in the imaging product for storing data. Applies to all volumes of internal memory and should be scaled accordingly for RAM. This adder does not apply to hard disk or flash memory.	0.5/GB
Scanner	N/A	N/A	<u>Applies to MFDs and Copiers only.</u> Includes: Cold Cathode Fluorescent Lamp (CCFL) or a technology other than CCFL, such as Light-Emitting Diode (LED), Halogen, Hot-Cathode Fluorescent Tube (HCFT), Xenon, or Tubular Fluorescent (TL) technologies. (Applied only once, regardless of the lamp size or the number of lamps/bulbs employed.)	0.5
Power Supply	N/A	N/A	Applies to both internal and external power supplies for standard-format, non-mailing machine products using Inkjet and Impact marking technologies with nameplate output power (P_{OUT}) greater than 10 watts.	$0.02 \times (P_{OUT} - 10.0)$
Touch Panel Display	N/A	N/A	Applies to both monochrome and color touch panel displays.	0.2
Internal Disk Drives	N/A	N/A	Includes any high-capacity storage product, including hard-disk and solid-state drives. Does not cover interfaces to external drives.	0.15

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Note: EPA has made a number of changes to Table 7, including:

- Renamed the “Data and Network Adders” “Interface Adders” for consistency with Equation 6

- 574 • Added a row specifically for fax capability, which was previously grouped with the low-data-rate
575 network adders
- 576 • Added back the Power Supply Adder and Internal Disk Drive Adder, which had been removed in
577 Draft 1.
- 578 • Added a touch panel adder. This is only intended to the capacitive touch functionality of small displays
579 included with imaging equipment and does not apply to other displays covered by the ENERGY STAR
580 Displays program.
- 581 • Clarified that the Memory Adder does not apply to hard disks or flash and that the Disk Drive Adder
582 does not apply to external drives.
- 583 • Increased the Cordless Handset allowance to 0.8 W in Draft 2, which was the requirement under
584 Version 1.2. A review of ENERGY STAR qualified Cordless Telephones indicates that the 0.5 W
585 power consumption proposed in Draft 1 is only achievable for the Additional Handset of a Cordless
586 Telephone system, not the Base Stations typically integrated into Imaging Equipment.

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588 3.4.5 Standby Power Consumption: Standby Mode power, which is the lesser of the Ready Mode
589 Power, Sleep Mode Power, and Off Mode Power, as measured in the test procedure, shall be less
590 than or equal to the Maximum Standby Power specified in Table 8..

- 591 i. The Imaging Equipment shall meet the Standby Power requirement independent of the state
592 of any other devices (e.g., a host PC) connected to it.

593 **Table 8: Maximum Standby Power Requirement**

Product Type	Maximum Standby Power (watts)
All OM Products	0.5

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595 **Note:** EPA would like to clarify that there is no Default Delay Time to Standby for Imaging Equipment
596 products proposed at this time.

597 Note: Products intended for sale in the US market are subject to minimum toxicity and recyclability
598 requirements. Please see ENERGY STAR Program Requirements for Imaging Equipment: Partner
599 Commitments for details.
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602 **Note:** To ensure that product designers are aware of Partner Commitments specific to toxicity and
603 recyclability, EPA has inserted the above note.

604 4 TESTING

605 4.1 Test Methods

- 606 4.1.1 When testing Imaging Equipment products, the test methods identified in Table 9 shall be used to
607 determine qualification for ENERGY STAR.

608 **Table 9: Test Methods for ENERGY STAR Qualification**

Product Type	Test Method
All Products	ENERGY STAR Imaging Equipment Test Method, Rev. May-2012

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610 4.2 Number of Units Required for Testing

611 4.2.1 Representative Models shall be selected for testing per the following requirements:

- 612 i. For qualification of an individual product model, a product configuration equivalent to that
613 which is intended to be marketed and labeled as ENERGY STAR is considered the
614 Representative Model;
- 615 ii. For qualification of a product family, the highest energy using configuration within the family
616 shall be considered the Representative Model. When submitting product families,
617 manufacturers continue to be held accountable for any efficiency claims made about their
618 imaging products, including those not tested or for which data was not reported.

619 4.2.2 A single unit of each Representative Model shall be selected for testing.

620 4.3 International Market Qualification

621 4.3.1 Products shall be tested for qualification at the relevant input voltage/frequency combination for
622 each market in which they will be sold and promoted as ENERGY STAR.

623 5 USER INTERFACE

624 5.1.1 Manufacturers are encouraged to design products in accordance with the user interface standard
625 IEEE 1621: Standard for User Interface Elements in Power Control of Electronic Devices
626 Employed in Office/Consumer Environments. For details, see <http://eetd.LBL.gov/Controls>.

627 6 EFFECTIVE DATE

628 6.1.1 Effective Date: The Version 2.0 ENERGY STAR Imaging Equipment specification shall take effect
629 on July 1, 2013. To qualify for ENERGY STAR, a product model shall meet the ENERGY STAR
630 specification in effect on its date of manufacture. The date of manufacture is specific to each unit
631 and is the date (e.g., month and year) on which a unit is considered to be completely assembled.

632 **Note:** EPA anticipates releasing a Final Version 2.0 specification by October 2012. As such, the effective
633 date provided above allows manufacturers time to work with certification bodies and update product
634 literature as needed to comply with the new requirements. As of July 1, 2013, only those models that have
635 been third-party certified by an EPA recognized Certification Body will remain on the ENERGY STAR
636 Qualified Product List. For information on third-party certification visit: www.energystar.gov/3rdpartycert.

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638 6.1.2 Future Specification Revisions: EPA reserves the right to change this specification should
639 technological and/or market changes affect its usefulness to consumers, industry, or the
640 environment. In keeping with current policy, revisions to the specification are arrived at through
641 stakeholder discussions. In the event of a specification revision, please note that the ENERGY
642 STAR qualification is not automatically granted for the life of a product model.

643 6.1.3 Items for Consideration in Future Revision:

- 644 i. **Network Proxy**: EPA will continue to monitor the implementation of proxying capability in
645 imaging equipment hardware and consider the development of a test method to determine the
646 presence of a network proxy (e.g. one compliant with ECMA-393 ProxZzzy for Sleeping
647 Hosts).

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- ii. **Draft Mode:** Stakeholders raised concerns with the current method of qualifying TEC products. Specifically, assigning TEC limits based on the maximum claimed speed while testing using the default speed. EPA and DOE have clarified the test method to avoid the confusion between the two potentially different speeds and will continue to monitor qualifying products to assess the impacts of these differences and potential test method changes in future revisions.
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- iii. **Recovery Time for OM Products:** EPA is interested in a recovery time requirement for OM devices and welcomes stakeholder input on the benefits of providing this data to consumers on the qualified product list. If substantial benefits exist, EPA and DOE may include a recovery time measurement for OM products in the next version of the test method.
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- iv. **TEC Requirements in Kilowatt-hours per Year:** EPA has added columns to the TEC Tables expressing the requirements in kilowatt-hours per year in addition to the currently-used kilowatt-hours per week. Although this is purely informative, EPA will consider making this unit the only way to express TEC in a future specification revision as a way to address issues with reporting accuracy and comparisons between other ENERGY STAR products (which typically report in kilowatt-hours/year).
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- v. **Consistency of speed values:** While the maximum claimed print speed is used for purposes of calculation and qualification, the as-shipped speed is used within testing to emulate the end user's expected performance. EPA is interested in measuring as-shipped speed within the test method, and using this value for qualification purposes. Possible test methods for consideration include ISO/IEC 24734:2009 Method for measuring digital printing productivity and ISO/IEC 24735:2012 Method for measuring digital copying productivity.
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- vi. **Wake Up Test Method:** EPA's intent is that ENERGY STAR qualified products use power management features, in the as-shipped condition, without requiring special configurations for use on the local network. If a fully networked machine is awoken by common network events, the energy associated with these events should be captured while testing for ENERGY STAR qualification. EPA and DOE are interested in working with stakeholders to develop a test method to standardize the wake up testing of units to capture this real world condition.