

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



OFFICE OF
AIR AND RADIATION

July 23, 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 2, Version 3.0 ENERGY STAR Imaging Equipment specification](#), the [Draft 3 ENERGY STAR Imaging Equipment Test Method](#), and the [Draft 1 ENERGY STAR Professional Imaging Equipment Test Method](#). EPA thanks stakeholders for the feedback that they have provided and has taken that feedback into consideration in developing this draft specification.

The Draft 2, Version 3.0 specification incorporates the following key modifications:

Imaging Equipment Energy Efficiency Criteria:

EPA has adjusted the requirements for TEC products to incorporate additional data that was provided by stakeholders. This [new dataset](#) includes all ENERGY STAR products currently in the market as well as additional non-ENERGY STAR certified products. The amended ENERGY STAR requirements differentiate the top quartile of the market overall and for each individual product segment, including for those speeds where most product is sold. In addition, after assessing the new dataset, EPA has reintroduced the A3 adder and added a Wi-Fi adder. No new criteria have been developed for OM products, but two adders have been removed due to lack of use by stakeholders.

Duplexing:

EPA received comment from stakeholders that the duplexing requirements proposed in Draft 1 were too stringent and unnecessary for the lower speed bins. After further discussion and consideration of an alternative proposal, EPA has adjusted the requirements, harmonizing with the Blue Angel criteria and making duplexing a default requirement for a smaller set of speeds. In addition, EPA has removed the optional duplexing option for products as very few products were using that option.

Recovery Time:

Stakeholders provided multiple comments regarding the proposed recovery time requirements, including that harmonization with Blue Angel would increase test burden, the Blue Angel recovery time requirements are inappropriate for ENERGY STAR due to the different paper used during testing, and the requirement is not needed due to market forces. EPA investigated these comments and found that stakeholders are already conducting a recovery time test as part of ENERGY STAR and therefore there is no additional testing burden. In addition, EPA investigated the differences between the tests with different paper and found that the median difference in recovery time was 1 second, which EPA believes makes the Blue Angel requirements appropriate for the US market as well. Finally, EPA reviewed the ENERGY STAR certified product list and found that over 70% of products meet the Recovery Time Requirements indicating that the requirements represent a fair backstop to ensure a good consumer experience.

Comment Submittal

EPA welcomes stakeholder input on the attached Draft 2, Version 3.0 specification. Stakeholders are encouraged to submit any comments to imagingequipment@energystar.gov by August 23, 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 Draft 2 on July 30, 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 [Imaging Equipment product development website](#) or go to www.energystar.gov/revisedspecs and navigate to "Imaging."

Please contact me at Fogle.Ryan@epa.gov or 202-343-9153 or Matt Malinowski, ICF, at Matt.Malinowski@icf.com or (202) 862-2693 with questions or concerns. For any other imaging equipment related questions, please contact 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

Enclosures:

[Draft 2, Version 3.0 Specification](#)

[Draft 3 Imaging Equipment Test Method](#)

[Draft 1 Professional Imaging Equipment Test Method](#)

[Data and Analysis Package](#)