

DOCKETED	
Docket Number:	17-AAER-12
Project Title:	Low-Power Mode
TN #:	271338
Document Title:	JBmia Comments - JBMIA Comments on Voluntary Performance Framework for Low-Power Modes Version One point Zero
Description:	N/A
Filer:	System
Organization:	JBmia
Submitter Role:	Public
Submission Date:	7/8/2026 4:22:33 PM
Docketed Date:	7/8/2026

*Comment Received From: JBMIA
Submitted On: 7/8/2026
Docket Number: 17-AAER-12*

JBMIA Comments on Voluntary Performance Framework for Low-Power Modes Version One point Zero

Additional submitted attachment is included below.

JBMIA Comments on Voluntary Performance Framework for Low-Power Modes Version One point Zero

July 3, 2026

JBMIA has participated, as an industry association, in discussions on the revision of energy efficiency standards such as ENERGY STAR and the Blue Angel. We recognize the importance of energy efficiency and are committed to promoting energy efficiency for printers and multifunction devices.

We submit the following comments.

Comment 1

Referenced Section

P11

CHAPTER 2: VPF-LPM Scope

Caveat: ENERGY STAR Imaging Equipment

Imaging equipment, including printers and multi-function devices as described in Table A-1, is an established ENERGY STAR product category with an established test method and with significant performance data already available. To avoid redundant testing and take advantage of the well-recognized data within the ENERGY STAR Program, the CEC requests that stakeholders submit data to the CEC for imaging equipment in accordance with the test method established by ENERGY STAR.11 The CEC requests all applicable ENERGY STAR data for imaging equipment, including energy consumption data for on mode, and request technical product information in alignment with data collected for the DCP-LPM. The CEC expects manufacturers to also upload data for models that do not meet the ENERGY STAR requirements to ensure a better overview of the marketplace.

Comment

We welcome the decision to allow, on an exceptional basis, the submission of data for imaging equipment based on the ENERGY STAR test method.

However, we provide the following comment regarding the CEC's request:

We propose that the imaging equipment covered by this framework be limited to products intended for individual household

users.

Rationale

Many of the products listed as in-scope are household products. In addition, Chapter 1 states that, “The inactive power consumption of devices in standby or sleep modes are estimated to cost about \$165 per U.S. household on average each year.” Based on this statement, we understand that the CEC's primary objective is to reduce energy consumption in standby and sleep modes for household products in order to lower energy-related expenditures for California households. We support this approach.

We believe that focusing initially on household products will enable more efficient and effective achievement of the framework's objectives. Furthermore, even if the scope is limited to products intended for individual household users, advances in relevant technologies and product designs are likely to have broader market impacts, thereby contributing indirectly to improved energy efficiency in office products as well.

With regard to products intended for commercial applications, their usage patterns and operating conditions differ significantly from those of household and office products. Therefore, we do not believe that such products should be included within the scope of this framework, either now or in the future.

Comment 2

Referenced Sections

P20-25

CHAPTER 4: Data Collection Procedure for Low-Power Modes (DCP-LPM)

A1-39

APPENDIX A: DCP-LPM V1.0

Comment

If additional data collection is conducted in the future, or if sufficient data are obtained in the current phase and the process advances to the criteria development stage, we strongly request that printers and multifunction devices continue to follow the ENERGY STAR test method rather than CHAPTER 4 or APPENDIX A: DCP-LPM.

Rationale

Imaging equipment, including printers and multifunction devices, already has established test methods and a substantial body of performance data.

Therefore, it is appropriate to continue utilizing the ENERGY STAR test method, rather than applying the DCP-LPM methodology.

Comment 3

Referenced Sections

A1-39

APPENDIX A: DCP-LPM V1.0

Table A-3: Data Documentation for DCP Inactive Condition Measurements

Table A-3: Data Documentation for DCP Inactive Condition Measurements*

<i>Data field type</i>	<i>Required Information</i>	<i>Possible Answers</i>
Energy Star Test Data for Imaging Equipment - Printers	Energy Star Certified	Yes No
	Page Format Size	Small Standard Large
	Marking Technology	Direct Thermal (DT) Electro-photographic (EP) High Performance IJ Impact Ink Jet (IJ) Thermal Transfer (TT)
	Color Capability	Monochrome Color
	Print Speed (ipm or mppm)	
	Automatic Duplex Output Capable	Yes No
	Typical Electricity Consumption (TEC) (kWh/wk)	
	Power in Sleep (Watts)	
	Power in Off (Watts)	
	Default Delay Time to Sleep (minutes)	

<i>Data field type</i>	<i>Required Information</i>	<i>Possible Answers</i>
Energy Star Test Data for Imaging Equipment - Multi-function Devices	Marking Technology	Direct Thermal (DT) Electro-photographic (EP) High Performance IJ Impact Ink Jet (IJ) Thermal Transfer (TT)
	Color Capability	Monochrome Color
	Print Speed (ipm or mppm)	
	Automatic Duplex Output Capable	Yes No
	Typical Electricity Consumption (TEC) (kWh/wk)	
	Power in Sleep (Watts)	
	Power in Off (Watts)	
	Default Delay Time to Sleep (minutes)	

Comment

For printers and multifunction devices in Table A-3, Typical Electricity Consumption (TEC) (kWh/week) should be removed.

Rationale

VPF-LPM focuses on low-power modes, and TEC is not within its scope. Therefore, TEC should not be included in the submitted data.

The ENERGY STAR test method consists of three different approaches, depending on product type and supported media size.

TEC values are only measured for products evaluated under the TEC method.

As a result, including TEC data—despite it falling outside the scope of VPF-LPM—would make it more difficult to achieve the minimum participation targets for the number of models specified in Table 3.



About JBMIA

The Japan Business Machinery and Information System Industries Association (JBMIA) is an industry group that aims to develop the Japanese economy and improve the office environment. Founded in 1960, it represents manufacturers and related companies in the business machinery and information systems industry. Our association's mission is to promote the inclusive development and rationalization of these industries and to keep up with advances in digitalization and networking. The Printer & MFD (multifunction Devices) Group promotes energy efficiency and the 3Rs (Recycle, reuse and reduce), standardizes terminology and specification formats, examines easy-to-understand displays for users, and identifies, reviews, and appropriately processes problems related to distribution.

For more information on JBMIA and our association's activities, please visit our association website or contact us directly.