

Ferhut, Faridoon

From: Lestercorn@aol.com
Sent: Tuesday, February 07, 2006 8:44 AM
To: Ferhut, Faridoon
Cc: exec@i-itc.org
Subject: (no subject)
Attachments: Cornelius-Burn11-05v1.pdf; STMC.pdf; InsideInt'lITC11-04.pdf

Dear Mr. Ferhut:

My name is Lester Cornelius. I was sent copies of the information regarding your efforts to establish an EPP, which I think is admirable and difficult to do. I am the Chairman of the International Imaging Technology Council which represents office supply dealers and the printer cartridge remanufacturing industry. I am also the Chairman of the Standardized Test Method Committee. My company is Optical Technologies Corp., which is a supplier to the remanufacturing industry. We remanufacture printer cartridge components.

I noticed in the notes several references to "drill and fill." I am unaware of a single company that would use that technique. There have been no drill and fill companies for many years. There are some do it yourself "burn and fill" kits sold mostly over the Internet. I am attaching an article I wrote about this. The drill and fill reference is a slur used by companies that want to sell new cartridges. It is a way to imply that remanufactured cartridges are of inferior quality.

Most of the remanufacturing industry is not ISO 9000 certified, however, many companies are STMC certified. This is of greater importance because it addresses cartridge performance.

I don't have any idea of what a restored toner cartridge is. I don't think you could find anyone in the remanufacturing industry that could define a restored cartridge.

I don't understand why reusing certain components would not have a higher point value than replacing components, provided cartridge performance is not adversely affected. There are some components which can be reused many times with no problems. There is very specific technology which exists to inspect components. It makes sense to me to include component reuse as a positive aspect. There are strong arguments that remanufactured product is preferable to recycled product.

I don't believe that there should be any restriction on innovation for improving cartridge performance. It is quite common practice to install enlarged toner hopppers to increase yield and decrease cost. There are improvements made over the OEM designs and they can affect both cost and reliability. Some OEM cartridges are designed so that the only way to open them up destroys part of the cartridge and it then needs a replacement part. HP's new 2600 toner cartridge has the drum welded in place. The only way to remove it is to cut the drum.

These are just a few points. The I-ITC will send you its comments for distribution as you see fit. We look forward to participating in this process.

Sincerely,

Lester Cornelius

3/28/2006