www.tiaonline.org | 10 G Street, NE, Suite 550 Washington, DC 20002 | Tel: +1.202.346.3240 Fax: +1.202.346.3241

Ms. Brenda Edwards
U.S. Department of Energy
Building Technologies Program
6th Floor, 950 L'Enfant Plaza, SW.
Washington, DC, 20024

January 28, 2011

Re: Energy Conservation Program: Test Procedures for Battery Chargers and External Power Supplies, Docket No. EERE-2009-BT-TP-0019

Dear Ms. Edwards:

The Telecommunications Industry Association (TIA) hereby submits input on the Department of Energy's (DOE) Test Procedures for Battery Chargers and External Power Supplies.[1] Specifically, TIA's comments are limited to the DOE proposal to require a physical disconnection to disable additional device functions in order to reduce power consumption to the level of a battery charger that is not equipped with those additional functions, allowing measurement of active energy usage.[2]

TIA represents the global information and communications technology (ICT) industry through standards development, advocacy, business opportunities, market intelligence and world-wide environmental regulatory compliance. Thousands of companies and individuals, with combined annual revenues of over $1 billion, work through TIA to enhance the business environment for telecommunications, broadband, mobile wireless, information technology,

[1] Department of Energy, Energy Conservation Program: Test Procedures for Battery Chargers and External Power Supplies, (Docket No. EERE–2009–BT–TP–0019) 75 Fed. Reg. 16958-16986 (April 2, 2010) (Proposed BCS Rules).

[2] Proposed BCS Rules *at* 16969.

networks, cable, satellite, unified communications, emergency communications and the greening of technology. TIA is accredited by the American National Standards Institute (ANSI).

Many TIA members produce products directly affected by the proposed testing procedures. These products include, among many others, cordless phones, answering machines, and combination cordless phones and answering machines. Furthermore, TIA notes that the Environmental Protection Agency's ENERGY STAR certification program – of which compliance is of the utmost importance for many TIA members – has announced plans to align relevant BCS testing procedures with that of DOE shortly after DOE's rulemaking concludes.[3] For these reasons, TIA values the opportunity to provide input at this time, and looks forward to providing more detailed comment in the forthcoming Notice of Proposed Rules from DOE.

While TIA shares the DOE's goals to improve energy efficiency, DOE must assess the technical implications of proscribing during testing a detachment of non-battery charging device functions in order to facilitate a power reduction to that of a battery charger that is not equipped with those additional functions, which would have the unintended consequence of hindering the deployment of energy efficient products. TIA wishes to emphasize that continuous telephony and answering device functionalities are not easily disconnected in order to allow separate measurement of the battery charger function. DOE seems to presume that telephony energy

[3] Environmental Protection Agency, ENERGY STAR® Program Requirements Product Specification for Battery Charging Systems, Eligibility Criteria, Draft 1 Version 2.0 (December 16, 2010) *available at* http://www.energystar.gov/ia/partners/prod_development/revisions/downloads/battery_charging_sys/BCS_Draft_1v2_Spec_Greyed_Out.pdf.

expenditures between a cordless phone or combination unit and the active battery charging functions are easily disengaged.[4]

In practice, cordless telephones and combination units lack the ability to render dormant the telephone functional circuitry while at the same time maintaining active battery charger operations, and to hold such an expectation is not realistic. Further, while evidence of compliance with DOE rules could be proven by the manufacturer possessing detailed knowledge of the product in question, labs do not typically engage in such a practice when certifying a product, further making compliance with DOE BCS testing certification uncertain despite the manufacturer producing a product that does indeed meet the testing requirements.

In order to obtain the BCS energy usage, TIA notes that DOE could instead require a two step process. First, BCS energy usage testing as proposed in the NOPR could be conducted while the telephone functions are active. Second, the telephone function energy usage, with the handset out of the cradle, would then be measured. By deducting the latter from the overall measurement obtained in the first step described above, the active BCS energy usage can then be attained without necessitating an intemperate process.

While providing comment on this fundamental issue to DOE at this time, as noted above, TIA plans to provide further depth and detail from the manufacturer perspective once DOE

[4] Proposed BCS Rules *at* 16969 (proposing that the tester merely "disconnect all auxiliary electrical connections to the BC" during the active mode BC test procedure).

releases its forthcoming proposed rules in this matter. TIA appreciates the DOE's efforts to increase energy efficiency on this important matter, and looks forward to working with the DOE on this and other issues vital to the ICT industry.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

By: _____

Danielle Coffey
Vice President, Government Affairs

Rebecca Schwartz
Director, Regulatory and Government Affairs

Brian Scarpelli
Manager, Government Affairs

Its Attorneys

January 28, 2011