

## Comments on Draft 1 Version 2.0 ENERGY STAR External Power Supplies Specification

### Submitted by:

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### Comments:



1) July 1, 2008 implementation date should be pushed out to Jan 1, 2010 to allow additional development time.

2) AC-AC requirements should only be applied up to 40VA output. The 0.5W limit can be met at 40VA output, however there is a significant size and cost penalty. I would recommend allowance of 0.5W to 25VA output, 0.75W to 40VA output.

3) Thoughtful consideration should be given to adding an efficiency relaxation factor for DC power supplies with output voltages less than 15Vdc. Please bear in mind that one of the following 2 events will eventually occur:

a) CEC makes the 2.0 specification mandatory, or

b) the federal government may make compliance to the 2.0 spec mandatory,

Many types of equipment will operate better on low DC output voltage, unfortunately, there is an efficiency penalty in the EPS (and EPS output cord) to produce the lower DC output voltage. In order not to eventually eliminate the benefits of using a low voltage DC power source, the efficiency relaxation factor should be granted. Recommended efficiency relaxation levels:

$(15 - V_{out}) \times 0.4\%$

This would yield a 4% efficiency relaxation factor for a 5V power supply, and a 1.2% efficiency relaxation factor for a 12V supply.

4) Power factor correction should only be mandatory for high volume products as indicated in EN61000-3-2. The specific requirement is for televisions and computer equipment. Other low volume types of equipment which do not put such a heavy drain on the power grid are not required to have power factor correction. It may be beneficial to have to separate marking protocols for V2.0 EPS with and without power factor correction, such as "efficiency level 5" and "efficiency level 6".

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Please see our energy star web page:

<http://www.jeromeindustries.com/ApNotes/EnergyStar.htm>

and our home page: <http://www.jeromeindustries.com/>

David Love

A handwritten signature in black ink that reads "David Love". The signature is written in a cursive, flowing style.

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