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Ms. Katharine Kaplan
U.S. Environmental Protection Agency
Office of Air and Radiation
1310 L Street, NW
Washington, DC 20005

Subject: ENERGY STAR Program Requirements Product Specification for Battery Charging Systems, Draft 1 Version 2.0

Dear Ms. Kaplan:

On behalf of the Consumer Electronics Association (CEA), thank you for the opportunity to comment on the latest proposed changes to the ENERGY STAR Battery Charging Systems (BCS) Specification, Version 2.

On December 14, 2010 the EPA hosted a webinar on the Draft 1 Version 2.0 of the ENERGY STAR specification for BCS. During the webinar, several stakeholders expressed concern regarding the proposed timeline for development of the ENERGY STAR BCS specification and requested that the EPA delay its process until the Department of Energy (DoE) completed portions of its related standard development work. As a result of these concerns the EPA adjusted its proposed timeline for the development of a specification for BCS with the intention of aligning more closely with DoE's standard development work for the consumer BCS product category. In particular, EPA proposes to delay development of portions of the specification that would be impacted by the DoE test procedure and standard. CEA commends the EPA for efforts to coordinate the ENERGY STAR BCS specification revision with the ongoing DoE activities.

As a long-time partner in energy efficiency, the consumer electronics industry is committed to the further success of the ENERGY STAR program. In particular, CEA members design, develop and sell cordless telephones, answering machines, and combination cordless telephones/answering machines (combination units). The comments in this letter are specific to telephony products.

Currently, cordless phones, answering machines, and combination units are covered by the ENERGY STAR Program Requirements for Telephony, Version 2, released October 2008. However, Draft 1 of the ENERGY STAR specification for BCS seeks to cover cordless phones, answering machines, and combination units and eliminates the ENERGY STAR specification for telephony products. As an initial matter, we note that telephone manufacturers have not been consulted about this proposed change. Telephone manufacturers became aware of the proposal to eliminate the telephony specification and cover these products under the BCS specification only after discovering it in the Draft 1 BCS specification. This is especially surprising given that telephone manufacturers had to recommit to the telephony program only days before release of the Draft 1 BCS specification.

