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Mr. Andrew Fanara
Office of Air and Radiation
United States Environmental Protection Agency
Washington, DC 20460

Dear Mr. Fanara,

The Consumer Electronics Association (CEA) is the preeminent trade association promoting growth in the $161 billion U.S. consumer electronics industry through technology policy, standards, events, research, promotion and the fostering of business and strategic relationships. CEA represents more than 2,200 corporate members. Among their numerous lines of business, CEA members design, develop, manufacture, and distribute consumer electronics that use external power supplies (EPSs). Such product include, but are not limited to, camcorders, computer monitors, cordless phones, digital cameras, laptop and notebook computers, mobile phones, personal digital assistants, printers, scanners, and two-way radios. CEA and its members have been very active in regulatory policy relevant to EPSs at the state, federal and international levels.

On October 11, 2007 the EPA released Draft 1 Version 2.0 of the ENERGY STAR External Power Supply (EPS) specification. This document outlines the proposed new energy efficiency requirements that EPS models would need to meet in order to earn the ENERGY STAR logo. Once final, this document is intended to replace the current Version 1.1 specification. On November 20, 2007 we wrote to express our concerns and general comments with respect to Draft 1. We understand that Draft 2 will be issued shortly and are submitting these comments for further consideration.

Recent Federal Legislation

The "Energy Independence and Security Act of 2007," was passed by the Congress and then signed into law by President Bush on December 19, 2007. The Act contains energy saving measures important to consumers and the consumer electronics industry including provisions for energy use disclosure, standby power consumption, and external power supplies. Specifically, among other matters, the law establishes new energy efficiency standards for EPSs, and manufacturers are currently producing and procuring devices that meet these new federal standards. Given that a new and mandatory federal energy efficiency standard is in place, which preempts earlier mandates in California and other states (that made the ENERGY STAR program specifications for EPSs mandatory), we strongly urge the EPA to

reconsider the value and costs related to further revisions of the ENERGY STAR specification for EPSs.

Effective Date

While we strongly urge the EPA to consider the utility of a revision to the EPS specification in light of recent Federal action, if a revision is indeed pursued, the effective date of any revised specification must be carefully weighed. Currently, the EPA is proposing that the ENERGY STAR EPS Version 2.0 specification take effect on July 1, 2008.

Considering ongoing efforts to meet new Federal and state energy efficiency mandates for this product category, CEA believes that if the EPA continues to pursue an update to this specification then the ENERGY STAR EPS Version 2.0 requirements should be made effective thirty months after final publication of the specification. Moreover, as highlighted in our November 20, 2007 letter, CEA seeks assurances from the EPA that any ENERGY STAR-compliant external power supplies manufactured prior to the effective date of the revised specification can continue to be marketed as ENERGY STAR.

Low Wattage Supplies

Many consumer electronic product categories rely on low wattage power supplies. The proposed requirements are significantly more stringent than existing regulations and products relying on low wattage supplies will find compliance with the proposed criteria extremely difficult to meet. The EPA has developed proposed new Active Mode levels for the ENERGY STAR EPS Version 2.0 specification from a dataset of 1,834 units measured in 2006 and 2007. According to the EPA, the dataset shows a compliance rate of 26% for units meeting the Active Mode and No-Load requirements. Because they are in the minority, compliant supplies carry a cost penalty that is not negligible compared to the savings that can be attributed to the proposed increase in efficiency for low wattage supplies. For example, a 5 W supply in active use 10% of the time and under no-load 90% of the time would only save about 1.9 kwh per year by complying with the proposed new specification limits instead of the Federal requirements. At average residential electrical rates of 10 cents/kwh[*], the 19 cents per year savings does not justify the premium cost of such supplies. An even more extreme example is a 6 W supply used to charge a camcorder once per month for an hour and a half, even if left plugged in overnight for an additional 12 hours of effectively no-load use, would save only 36 wh (0.036 kwh), or less than 1 cent worth of electricity per year.

[*] Average residential electrical rates were 8.4 cents/kwh in 2005 according to Department of Energy figures found at http://www.eia.doe.gov/bookshelf/brochures/rep/.

We appreciate the opportunity to comment again on the Draft 1 ENERGY STAR EPS Version 2.0 specification. We look forward to continued close cooperation. Please do not hesitate to contact us if you have any questions.

Sincerely,

_/s/_____

Brian Markwalter
Vice President, Technology & Standards

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Senior Director, Technology Policy & International Affairs

Bill Belt
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cc: Kathleen Hogan
Director, Climate Protection Partnership Division
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