

Comments on Revised Final Draft Version 2.0 ENERGY STAR External Power Supplies Specification

Submitted by:

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Comments:

Robin,

Is there anyway we could get a modification to the spec to allow units with AC ON-OFF switches in order to reduce the NO LOAD power consumption issue with AC-AC units and AC-DC unregulated (non-switchmode) power units.

As I have stated in numerous emails on the subject of the fundamental physics limiting the no-load power consumption on large transformers from 30VA to 250VA, it is virtually impossible to maintain the 0.5W limit, above 50VA we see no possible method. Between 30VA and 50VA, the techniques cause a high initial unit price penalty.

Yet customers of ultra-sensitive electronic apparatus want the low noise aspects of a non-switchmode AC power adapter.

Please note the informative notes in the 2.0 draft recently released shows an error in the implementation date and efficiency level required for Australia/New Zealand, as the actual requirements are much more relaxed than those stated in the erroneous note. Additionally, Australia/New Zealand has eliminated any no-load watts requirement for AC-AC external power supplies. Please see the following Jan 2008 web-link:

<http://www.energyrating.gov.au/library/pubs/2008-factsheet-eps.pdf>

If modification of the V2.0 spec to allow inclusion of an option to use an ON-OFF switch in order to reduce NO-LOAD watts consumption is not feasible at this time. Is it possible that you could respond on this issue regarding the EPA's position on the acceptability of this compliance approach for AC-AC and AC-DC unregulated (non-switchmode) external power supplies?

Note, we intend to require that a user manual alert the end-user to the following:

"The ON-OFF power switch should be used to prevent AC power loss when the system is not in use. Doing so will save electricity cost, and will also benefit the environment."

Best Regards,
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