



TELECOMMUNICATIONS
INDUSTRY ASSOCIATION

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Mr. Paul Karaffa
ENERGY STAR Product Development
U.S. Environmental Protection Agency
Energy Star for Office Equipment
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: ENERGY STAR Telephony Draft 1 Version 3.0 Specification

Dear Mr. Karaffa:

The Telecommunications Industry Association (TIA) hereby submits its comments on the ENERGY STAR Telephony Draft 1 Version 3.0 Specification.¹

I. INTRODUCTION

TIA represents the global information and communications technology industry through standards development, advocacy, tradeshow, business opportunities and market intelligence. TIA's hundreds of member companies' products and services empower communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military and entertainment. Our members work through TIA's voluntary, consensus-based process to enhance the business environment for telecommunications, broadband, mobile wireless, information technology, networks, cable, satellite, unified communications, emergency communications and the sustainability of technology.

¹ See ENERGY STAR Product Specification for Telephony Draft 1 Version 3.0 (Jun. 19, 2013), available at www.energystar.gov/products/specs/sites/products/files/Draft1_Version3_Telephony_Specification.pdf.

TIA members have long been supporters of the ENERGY STAR program and commend the program's outreach to industry to ensure that the requirements of the ENERGY STAR program evolve to reflect developments in technologies while enabling our companies to innovate best-in-class technologies. TIA believes that the current certification criteria for telephony products has cultivated a competitive environment for manufacturers as well as furthered the EPA's ENERGY STAR program's efforts through the implementation of practicable and reasonable qualification efficiency requirements. TIA believes that the continued trend of industry rising to meet the ENERGY STAR qualification levels is an indication of a successful and dynamic partnership between the EPA, DOE, and the manufacturers to increase the energy efficiency of products. Maximum consumer benefit will occur if the ENERGY STAR program continues to implement realistic and achievable standards that enable recognition of and the associated awards for innovation through certification.

II. DISCUSSION

1. TIA recommends that the ENERGY STAR base power allowance for cordless phones be recalculated.

The proposed base power allowance for analog cordless, corded, and conference telephones in the specification document is 0.9 Watts.² Specific to cordless phones, TIA is concerned that the proposed base power allowance will result in significantly less than 25% of cordless phones qualifying for the ENERGY STAR label. The proposed base power allowance was calculated using data from two separate data sets: 1) New data shared by manufacturers during the ENERGY STAR Version 3.0 Data Assembly period and 2) Data from the Version 2.2 ENERGY STAR Qualified Products List. TIA is concerned that the new manufacturer data set relevant to cordless phones is not sufficiently robust to be representative of cordless phones

² See ENERGY STAR Product Specification for Telephony Draft 1 Version 3.0, at 7.

currently on the market. The new data for cordless phones comes from a single manufacturer using the most recent test procedure. Use of the data from the Qualified Products List to set ENERGY STAR levels for cordless phones is problematic as it will not reflect comparable numbers using the most recent test method. Use of the data from the Qualified Products list will require allowances to account for differences in data between the Version 2.2 and Version 3.0 test procedures. Specifically, the data reported from the Qualified Products List using the Version 2.2 Test Procedure is for Standby (Partial On) mode without additional handsets and accessories active in the system. Based on the new manufacturer data using the updated test method, DOE has determined a difference exists in power consumption between when additional handsets are or are not active.

The Draft 3 Test Method states the following:

Note: In the Draft 2 Test Method used for the stakeholder data call, DOE required that all UUTs sold with Additional Handsets and accessories be tested both with and without Additional Handsets and accessories set up in their default configurations. Based on stakeholder data, DOE has determined that Additional Handsets and accessories impact the power consumption of the UUT and has updated the Draft 3 Test Method to require that UUTs be tested with all Additional Handsets and accessories set up.³

Based on the limited sample provided in the new data, there is an average increase of approximately 0.44 W when units are tested with additional handsets active in the system. This difference will need to be taken into account when calculating the Version 3.0 base power allowance. TIA believes EPA will require a more robust data set of new manufacturer data using the new test method to set an accurate Version 3.0 ENERGY STAR level.

2. TIA recommends that the definition of Off Mode take into account the various Off Mode options offered by different manufacturers.

The draft specification currently defines Off Mode as follows:

³ See ENERGY STAR Telephony Draft 3 Test Method Rev. May-2013, at 3, available at www.energystar.gov/products/specs/sites/products/files/Draft%203_Verison3_Telephony_TestMethod.pdf.

Off Mode: A mode that may persist for an indefinite time when a Telephone is connected to a power source and a telephone line or other physical or wireless network connection and is NOT capable of receiving a call absent external stimulus such as network initiation, physical interaction with the receiver or other part of the Telephone.

Manufacturers are able to and achieve Off Mode in multiple ways. TIA emphasizes that EPA read the definition of Off Mode as inclusive of the variety of techniques offered by manufacturers to ensure none of these techniques are excluded. This is critical given the Off Mode Incentive offered as part of the Version 3.0 specification.

3. TIA recommends that EPA consider additional categories for additional functional adders.

The specification document currently proposes a very limited number of adders. TIA recommends that EPA continue to explore and remain open to the inclusion of additional functional adders. Manufacturers continue to add features and functionalities to telephones that add value and improve the experience for the consumer. These additional features and functionalities could potentially impact power consumption of the device in Partial On Mode. Color LCD screens (possibly based on screen size), Media Encryption capability, and speakerphone capabilities are examples of features that could have some impact on power consumption of the device. TIA recommends that EPA remain open to providing additional functional adders.

III. CONCLUSION

TIA appreciates the opportunity to provide additional comments and looks forward to continuing to work with EPA and DOE on the ENERGY STAR program in product categories in the ICT industry.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

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