



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

January 14, 2011

Dear Ms. Kaplan:

The Telecommunications Industry Association (TIA) hereby submits its comments on the Environmental Protection Agency's (EPA) Updated Draft 1 Version 2.0 ENERGY STAR Program Requirements for Battery Charging Systems – Eligibility Criteria.¹ TIA represents the global information and communications technology (ICT) industry through standards development, advocacy, business opportunities, market intelligence and world-wide environmental regulatory compliance. Thousands of companies and individuals, with combined annual revenues of over \$1 billion, work through TIA to enhance the business environment for telecommunications, broadband, mobile wireless, information technology, networks, cable, satellite, unified communications, emergency communications and the greening of technology. TIA is accredited by the American National Standards Institute (ANSI).

Of particular relevance to this proceeding, many TIA members produce products implicated by the proposed changes to the ENERGY STAR Version 1.0 Battery Charging Systems (BCS) specifications. These products include cordless phones, answering machines,

¹ EPA, Updated Draft 1 Version 2.0 ENERGY STAR Program Requirements for Battery Charging Systems – Eligibility Criteria (December 16, 2010).



and combination cordless phones and answering machines. TIA's member companies have in the past and continue to fully support the EPA's ENERGY STAR program and its efforts.² TIA commends the EPA's decision to reserve action in areas that will be affected by the ongoing Department of Energy (DOE) rulemaking for its consumer BCS category, and looks forward to providing comment on the portions of this proposal once finalized by DOE.³

I. The EPA's Current Energy Star Specification for Battery Chargers has Fostered Increased Efficiency

TIA's members greatly value the ENERGY STAR certification, and rely on this certification to market their products to retailers and consumers. Currently, cordless phones, answering machines, and combination cordless phones and answering machines fall under the ENERGY STAR Program Requirements for Telephony Eligibility Criteria (Version 2.1).² Under the ENERGY STAR Program Requirements for Telephony Eligibility Criteria (Version 2.1) specifications, manufacturers of cordless telephones, answering machines, and combination cordless phones and answering machines have worked diligently to make their products eligible for ENERGY STAR certification.

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 minimum requirements. When,

² EPA, Version 2.1 Energy Star Program Requirements for Telephony (October 2, 2008).



for instance, stricter Telephony Program certification criteria became effective in 2006, the external power supply (EPS) Average Efficiency and No-Load requirements were difficult to meet for many manufacturers. Since that time, manufacturers have continued to significantly increase the energy efficiency of their products. For example, many of TIA's members have introduced charging algorithms that cease BCS energy flow once the battery is fully-charged. In addition, the introduction of switched mode power supplies has proven a successful means to save energy consumption in devices. Efforts such as these have allowed telephone manufacturers to meet the even more stringent Version 2.0 EPS criteria that went into effect in November 2008 and have resulted in significant energy savings and an increased proportion of devices that are eligible for ENERGY STAR certification.

The fact that many more manufacturers' products meet the ENERGY STAR certification today should not suggest that thresholds are outdated or ineffective. TIA believes that this is instead an indication of a successful and dynamic partnership between the EPA and the manufacturers to increase energy consumption efficiency in products, and should be embraced. Maximum consumer benefit will occur if the EPA continues to implement realistic and achievable standards that enable recognition of and the associated awards for innovation through ENERGY STAR certification.

For these reasons, affected TIA members were required to recommit to the ENERGY STAR program in November of 2010 in order to keep their products certified.³ However, shortly

³ EPA Stakeholder Letter, Draft 1 Version 2.0 specification for Battery Charging Systems (October 26, 2010).



after this, the EPA curiously released the draft BCS specification at issue on December 7 in which it proposed to eliminate the Telephony Program and consider cordless phones and combination cordless phone and answering machine units as “battery chargers” in spite of the commitments that telephone manufacturers had made. This proposal, which has severe consequences for telephony manufacturers that value energy efficiency certifications, has not been communicated to EPA Telephony Partners to date. Accordingly, TIA requests that the EPA communicate any future proposed changes that affect telephony equipment to all relevant stakeholders.

II. Altering the BCS Sub-Categories does not Reflect the Diverse Functionality of Affected Products

TIA urges the EPA to carefully consider the consequences of lumping cordless phones and combination cordless phone and answering machines under a BCS category. Such a classification fails to recognize the full amount of functions that TIA’s manufacturers’ products perform. Instead, TIA urges the EPA to allow for these products to remain in separate categories under the current certification standards.

Continuing to differentiate cordless phones and combination cordless phones and answering machines from true BCSs will accurately reflect the fact that the battery charging is only one of many functions that these products perform. For example, cordless phones, aside from the BCS component, include systems that monitor the phone line for incoming calls and



monitor the radio link with the cordless handset for outgoing calls, among others. For combination cordless phones and answering machines, the base unit must be able to address tasks like playback of voice messages upon user demand. Many also have the ability to locally record memos to other family members. The combination of these functions illustrate that the BCS is only one of many components in the product. Furthermore, while not mentioned in the proposed BCS criteria, it is unclear to TIA what the role of the stand alone “answering machine” and “additional handsets” sub-categories would be.

Instead of grossly generalizing the functionalities of these affected products by the new rules, TIA urges the EPA to refrain from the proposed recategorization at this time. TIA encourages the EPA to work with manufacturers and other stakeholders to redefine ENERGY STAR certification standards as necessary, specific to the existing classifications, and is fully committed to engaging the EPA in this discussion. Despite a suggestion to the contrary in the DoE’s proposal for battery charger testing procedures,⁴ there is no easy way to simply “disconnect all auxiliary connections to the BC” when testing a cordless phone or combination cordless phone and answering system base unit. Even if a manufacturer could do so by opening the product and knowing how to disable all circuitry except that required for the battery charger function, such a process is totally incompatible with the third-party testing that will be required for ongoing product verification and in most cases for the initial product qualification under the ENERGY STAR Program. Instead, separate allowances need to be made for the battery

⁴ Energy Conservation Program: Test Procedures for Battery Chargers and External Power Supplies, 75 Fed. Reg. 16969-16970 (Apr. 2, 2010).



www.tiaonline.org

10 G Street, NE, Suite 550
Washington, DC 20002

Tel: +1.202.346.3240
Fax: +1.202.346.3241

charging function and for the more fundamental telephony functions of cordless phones and combination cordless phone and answering system units. Including both types of functions, with appropriate allowances for each, should appeal to the EPA as a much better measure of the total Unit Energy Consumption (UEC) from an ENERGY STAR perspective. TIA believes that by examining the current subcategories individually for the most effective changes in ENERGY STAR certification standards, the incentives that have resulted in a vibrant and evolving system can continue.



III. Conclusion

TIA appreciates the EPA's initiative on this important matter, and looks forward to working with the EPA on this and other issues vital to the ICT industry.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

By: _____ /s/ _____

Danielle Coffey
Vice President, Government Affairs

Rebecca Schwartz
Director, Regulatory and Government Affairs

Brian Scarpelli
Manager, Government Affairs

Its Attorneys

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