



TELECOMMUNICATIONS
INDUSTRY ASSOCIATION

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October 21, 2013

Ms. Verena Radulovic
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 2 Version 3.0 Specification

Dear Ms. Radulovic:

The Telecommunications Industry Association (TIA) hereby submits its comments on the ENERGY STAR Telephony Draft 2 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 2 Version 3.0 (Aug. 14, 2013), available at www.energystar.gov/products/specs/sites/products/files/ES_Telephony_Draft2_V3_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 leading innovation in energy efficiency technologies.

II. DISCUSSION

1. TIA recommends that phones with combination corded/cordless base units should be treated as cordless phones, not corded phones.

In the Draft 2 specification, the proposed base power allowance for analog corded phones is 1.1 W, and the proposed base power allowance for cordless phones is 1.3 W. There are currently multiple phones qualifying for ENERGY STAR that have combination corded/cordless base units.² Although these phones have a corded handset, they are essentially cordless base units without charging cradles. Since there is no criteria related to the handset charging mode, phones with combination corded/cordless base units should be allowed the same power usage as other cordless base units at 1.3 W. The 1.1 W allowance should apply to corded telephones that

² Examples of combination corded/cordless phones include phone models: AT&T CL84100, AT&T CL84200, AT&T TL86109, Panasonic KX-TG9291, Uniden D1788, Uniden D3288, Uniden 3588.

do not include a cordless radio in the base.

2. TIA recommends that the base power allowances for telephony not be changed beyond what is currently proposed in the Draft 2 Specification.

The base power allowances proposed for the Version 3 specification represent a significant increase from the efficiency required in the ENERGY STAR Version 2.2. ICT vendors continue to prioritize energy efficiency in the engineering, manufacture and life cycle of new products and solutions. As proposed, the base power allowances in the Draft 2 Specification will recognize and reward energy efficiency technology leadership and innovation. Moving beyond the proposed base power allowances in Draft 2 would be unrealistic and negatively impact the specification.

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

/s/ DANIELLE COFFEY

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