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January 14, 2011

Ms. Katharine Kaplan
ENERGY STAR Product Development
U.S. Environmental Protection Agency
ENERGY STAR for Battery Charging Systems
1200 Pennsylvania Ave., NW (6202J)
Washington, DC 20450
[Sent via e-mail to: Kaplan.Katharine@epamail.epa.gov]

Re: Comments on ENERGY STAR BCS Draft 1, Version 2.0

Dear Ms. Kaplan:

VTech Communications, Inc. appreciates the opportunity to comment on the Environmental Protection Agency's (EPA's) Updated Draft 1 Version 2.0 ENERGY STAR Program Requirements for Battery Charging Systems – Eligibility Criteria. VTech is an ENERGY STAR Telephony Partner and a leading manufacturer of wireline telephony products under both the VTech and AT&T brand names

ENERGY STAR Telephony Program Partners Have Not Been Notified

We would first like to take note that the proposal to include cordless phones and combination cordless phones and answering machines (combination units) under the Battery Charging Systems (BCS) specification and apparently do away with the Telephony Program has not been directly communicated to the ENERGY STAR Telephony Program Partners. We only learned about it through reading the details of the draft V2.0 BCS specification. We also note that the draft BCS specification was released on December 7, 2010; whereas telephone manufacturers had to recommit to the Telephony Program prior to November 30, 2010 in order to avoid having their products removed from the Qualified list on January 1, 2011. This failure to communicate with Telephony Partners and seek their stakeholder inputs is a matter of grave concern.

Basic Telephony Functions Should Not Be Ignored

To classify cordless phones and combination units as “battery chargers” is to ignore their primary function of providing communications services. This primary function involves the base station monitoring the telephone line for incoming calls and monitoring the radio link to the cordless handset, or in many cases multiple cordless handsets, to determine when the user may wish to place an outgoing call. In addition, combination units must be able to respond to user requests to play back recorded messages either directly at the base unit or sometimes through the cordless handset. These combination units often provide additional functions such as leaving a voice memo for another family member. Multiple handset cordless phones and combination units also frequently provide a paging and intercom function.

The primary telephony functions of monitoring the telephone line for incoming calls, monitoring the radio link to the handset for indication of user input, and being ready to respond to direct user input to the base station go on continuously 24/7, 365. The additional battery charger function is something that only occurs if the handset is in the charge cradle and even then is split between an active charge



function and a relatively low energy usage charge maintenance function. In some cases, the charge function may be completely turned off once full charge has been achieved.

Basic Telephony Functions Cannot Be Easily Disabled for Battery Charger Testing

While the EPA has listened to BCS stakeholders and wisely decided to delay implementation of any active charge and maintenance function criteria until the Department of Energy (DoE) completes its Rulemaking process on battery charger test procedures, there appears to be a presumption by both the EPA and DoE that energy usage for the telephony functions of a cordless phone or combination unit is readily separable from the energy usage for active battery charging and maintenance functions. Perhaps EPA is relying on a statement in the DoE NOPR for changes to the battery charger test procedure in 10 CFR 430, Subpart B, Appendix Y (75 FR 16,958) suggesting the tester simply “disconnect all auxiliary electrical connections to the BC.” The draft text in Section III.B.4(f), Non-Battery Charging Functions (p 16,969) of the NOPR reads, in part, as follows:

“The first type of additional functionality is exemplified by cordless telephone bases that monitor the state of the telephone line and/or store voicemail messages. These types of devices provide an added utility through connection with other systems, e.g., the telephone line. Because the additional functionality relies on the connection to other parts of the system, manufacturers can use a physical disconnection (required by the proposed BC active mode test procedure) as a signal to the device to disable the additional functionality and reduce power consumption to the level of a BC that is not equipped with that additional functionality.”

Cordless telephones and combination units have no means to disable the circuitry that provides the telephony functionality while leaving the battery charger functionality active when disconnected from the telephone line, nor is it reasonable or perhaps even possible, to do so. Even if a manufacturer could use its design knowledge to remove power from the telephony circuitry in a product sample for testing purposes, this is not an acceptable solution for use by third-party test houses as required under the ENERGY STAR program for ongoing verification testing and, in many cases, for initial product qualification.

Telephony Program Should Be Continued and Perhaps Modified to Account for Unit Energy Consumption of both Battery Charging and Telephony Functions

In fact, qualifying cordless phones and combination units based on their energy usage for the part time battery charging and maintenance functions while ignoring the 24/7, 365 energy usage for performing their primary telephony functions seems completely counter the concept of Unit Energy Consumption (UEC) and the overall goals of the ENERGY STAR program. Instead, what is needed is a well thought out procedure that takes both the energy usage by the telephony functions and by the battery charging and maintenance functions into account with appropriate criteria for each, or perhaps one overall UEC allowance that includes both. This can best be achieved by continuing to have a separate Telephony program where the details can be worked out with the appropriate stakeholders.

Another concern raised by the BCS proposal is that stand alone answering machines and additional cordless handsets seem to be completely ignored. They are not mentioned as being part of the BCS program, nor does it seem the Telephony program would continue with just those product types in it. While there seems to be few, if any, standalone answering machines qualified under the ENERGY STAR program, there certainly are a number of additional cordless handsets. In fact, the widely used DECT cordless phones and combination units allow the creation of complete product families that consist of one base station with its corresponding cordless handset, and varying numbers of additional cordless handsets that can be paired with it. For example, VTech offers product families ranging from just the base unit with its single handset to a base unit and four or five additional handsets sold together in a package. In many cases, the number of additional handsets that can be supported by the base unit can be expanded even further (12 cordless handsets is not an uncommon capability).

Thus, the base units and the additional handsets must be part of the same ENERGY STAR program to facilitate the qualification of product families as described above.

An additional category of product that should be added to a revised Telephony program is the corded telephone that uses an external power supply. Such corded phones generally are feature rich, often support multiple telephone lines, and are frequently used in small business applications. They could easily be included in a revised Telephony program that accounts for energy consumption of the telephony features in addition to the energy consumption of the battery charging features associated with cordless handsets. VTech is one Telephony Program stakeholder that would be interested in participating in the development of such revised eligibility criteria.

Sincerely,

A handwritten signature in black ink that reads "Stephen R Whitesell". The signature is written in a cursive style with a large, prominent 'S'.

Stephen R Whitesell
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