



A member of CCT TELECOM GROUP



January 14, 2011

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

RE: Comments on ENERGY STAR BCS Draft 1, version 2.0

Dear Ms. Kaplan:

CCT TECH USA INC. (CCT) 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. CCT is an Energy Star partner and a stakeholder in this matter.

CCT together with its worldwide affiliated companies designs, manufactures and sells cordless and corded telephone products. We share the concerns expressed in the comments submitted January 14, 2011 by Stephen Whitesell on behalf of VTech Communications and believe that a studied approach that takes into consideration the multiple functionalities of telephone products is necessary. CCT is not in agreement with the proposed reclassification of telephone products at this time and urges the EPA to work with manufacturers and other stakeholders to enhance ENERGY STAR certification standards while maintaining the existing telephony program format.

Respectfully submitted,

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