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September 15, 2008

Mr. Andrew Fanara  
ENERGY STAR Product Development  
U.S. Environmental Protection Agency  
Office of Air and Radiation  
Washington, DC 20460

Dear Mr. Fanara,

This letter is in reference to your August 29, 2008 letter seeking comments on proposed amendments to the Version 2.0 ENERGY STAR Telephony specification. The Consumer Electronics Association (CEA) is the preeminent trade association promoting growth in the \$173 billion U.S. consumer electronics industry through technology policy, standards, events, research, promotion and the fostering of business and strategic relationships. CEA represents more than 2,200 corporate members. Among their numerous lines of business, CEA members design, develop, manufacture, and distribute consumer electronics that use external power supplies (EPSs). Such products include, but are not limited to, telephony products.

Cordless telephones, answering machines, and combination units (cordless telephones with integrated answering machines) are currently covered by the ENERGY STAR Program Requirements for Telephony (Version 2.0). In addition, Telephony Program products that utilize EPSs must also ensure that the EPS unit meets the Version 2.0 ENERGY STAR External Power Supply specification, released April 23, 2008. The EPS specification becomes effective on November 1, 2008.

As discussed in CEA's letter to the EPA dated July 9, 2008 and during a subsequent conference call with EPA staff on July 23, 2008, most Telephony Program products utilize an EPS that converts AC to DC electrical voltage with a nameplate power that is typically rated between 4 to 7 watts. One of the requirements in the new ENERGY STAR EPS specification is a No-Load Energy Consumption maximum limit of 0.3 watts. The EPSs used with many Telephony Program products will not meet this specification. This is due to the fact that cordless telephones, answering systems, and combination units will never be in a no-load situation. Such products are continually monitoring the telephone network for incoming telephone calls. In addition, cordless telephones and combination units are periodically (several times each second) also monitoring the radio link to the cordless handset, whether in or out of the charge cradle, to determine if the user desires to place an outgoing call.

Based upon these facts, the requirement that EPSs for Telephony Program products be tested to a No-Load Energy Consumption Criteria is unreasonable and unnecessary for the cases of cordless telephones, answering machines, and combination units.

Your August 29 letter proposed to remedy this situation by modifying the Version 2.0 ENERGY STAR Telephony specification to require that any external power supply used in conjunction with an ENERGY STAR qualified telephony product meet only the Active efficiency and power factor requirements of the Version 2.0 ENERGY STAR EPS specification. Thus, EPSs used in conjunction with ENERGY STAR qualified telephony products would not be required to meet the ENERGY STAR No-load requirement of 0.3 or 0.5 watts.

**CEA fully supports the proposed modification to the Version 2.0 ENERGY STAR Telephony specification as detailed in your August 29 letter.**

We appreciate the opportunity to comment on the proposed amendment to the Version 2.0 ENERGY STAR Telephony specification and we look forward to continued close cooperation with the ENERGY STAR program. Please do not hesitate to contact us if you have any questions.

Sincerely,

/s/  
\_\_\_\_\_  
Bill Belt  
Senior Director, Technology & Standards

cc: Mehernaz Polad  
ICF International

Ms. Robin Clark  
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