

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



OFFICE OF  
AIR AND RADIATION

August 29, 2008

Dear ENERGY STAR® Telephony Stakeholder:

The purpose of this letter is to propose amending the Version 2.0 ENERGY STAR Telephony specification. The modification would require that any external power supply (EPS) 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. The proposed amendment would take effect on November 1, 2008. Please note, however, that all Class A EPSs manufactured on or after July 1, 2008 are required to meet the 0.5 watt No-load requirement of the federal minimum energy efficiency standard for EPSs that took effect on July 1, 2008. Please refer to the following US Department of Energy Web site for additional information:  
[http://www1.eere.energy.gov/buildings/appliance\\_standards/residential/battery\\_external.html#regulations](http://www1.eere.energy.gov/buildings/appliance_standards/residential/battery_external.html#regulations).

Since its introduction in 2005, the EPS specification has been designed as a horizontal ENERGY STAR specification, applicable across a wide variety of end-use products. In the interest of cost effectively achieving efficiency gains, while avoiding having to address each end-use separately, the ENERGY STAR Test Method for EPSs does not attempt to replicate actual usage patterns for any one product category. Generally speaking, the methodology provides an overall assessment of energy efficiency; allows for product comparisons; and ensures reproducible results by testing in accordance with the industry accepted test method, which requires testing to determine the average Active efficiency at 100%, 75%, 50%, and 25% of rated current, as well as measuring the EPS in the No-load condition. This approach allows EPA and others to know with reasonable certainty that an EPS is efficient regardless of the product type it is paired with and the end-use product usage patterns. Tailoring the EPS requirements on a product specific basis is not generally practical, would not be consistent with the principles of this approach, and would only be considered in rare instances. However, telephony is an end-use product for which: 1) a separate ENERGY STAR standby mode specification of 1 - 2.5 watts (depending on product-type) has been in effect since November 1, 2006 and 2) it is unlikely that users would leave the EPS plugged in with the base and handset disconnected (i.e., with EPS in No-load). For these reasons, EPA is proposing to allow telephony products with EPSs to qualify for ENERGY STAR by meeting the Version 2.0 Active efficiency and power factor requirements (where applicable) and not the No-load requirement for EPSs.

The primary portion of the Version 2.0 ENERGY STAR Telephony specification that would be modified as a result of this proposed amendment is Section 3) B. External Power Supply Efficiency Requirements. This section of the specification is provided below, with changes tracked to reflect the proposed amendment:

- B. External Power Supply Efficiency Requirements: All telephony products designed for use with external power supplies must use external power supplies that meet or exceed the Active efficiency and power factor requirements (where applicable) of the Version 2.0 ENERGY STAR requirements for single voltage external ac-dc and ac-ac power supplies. External power supplies used in conjunction with telephony products do not need to meet the No-load requirement of 0.3 or 0.5 watts, depending on type of external power supply (ac-ac or ac-dc) and nameplate output power (unless otherwise required by federal standard). Please note: EPA is not requesting that telephony manufacturers test and submit data on external power supplies.

A list of ENERGY STAR qualified power supplies is featured on the ENERGY STAR Web site, for your reference. If the external power supply specification is revised over time (e.g., a **Version 3.0 specification is developed**), then similar modifications will be made to this Version 2.1 telephony specification within a reasonable time period. For more information on the external power supply program, visit the ENERGY STAR Web site at [www.energystar.gov/powersupplies](http://www.energystar.gov/powersupplies).

Stakeholders are requested to **provide comments on the above proposal no later than September 15, 2008**. Please send comments via e-mail to Mehernaz Polad, ICF International, at [mpolad@icfi.com](mailto:mpolad@icfi.com). All comments received will be posted to the ENERGY STAR Product Development Web site, unless the submitter specifically requests that their comments remain confidential.

Thank you in advance for your input. Please feel free to contact me at (206) 553-6377 or [Fanara.Andrew@epa.gov](mailto:Fanara.Andrew@epa.gov).

Best Regards,



Andrew Fanara, EPA Product Manager  
ENERGY STAR Product Development  
U.S. Environmental Protection Agency

**Deleted:** Once this Version 2.0 specification takes effect, telephony manufacturers who incorporate external power supplies in their product design must use products that meet or exceed Tier 1 of the ENERGY STAR specification for single voltage external ac-dc and ac-ac power supplies. (

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