

First let me compliment you on this effort. I think the intent is well outlined and easily understood.

I would like to urge more clarification on the type of external power supplies which would be required to meet the specification. In particular could wording be added to state "External power supplies which are connected to AC mains using a wall plug". I'm sure there is a better way of stating that, but the intent is to clearly define which units should be covered.

For example, there are industrial supplies that are mounted to the exterior of large industrial equipment. These power supplies are connected via specialized connectors, are installed in low volume (compared to power supplies for laptops, cell phones and such consumer electronics). Furthermore turning the machines off typically involve disconnecting the input mains from the machine, so these power supplies would never operate in an 'idle - no load' condition. Adding this feature would add unnecessary cost to this type of power supply.

It is clear the intent of the requirement is for consumer electronics, but the current phrasing would not preclude someone classifying external power supplies for industrial use under the same category. Listing particular equipment could never be inclusive enough, so I suggest phrasing the standard based on how the primary of the power supply connects to the AC mains. This would clearly include any and all external power supplies which could be used in a manner intended to comply with the Energy Star rating, and would not include specialized devices for industrial use.

Thank you for your consideration in this matter.

Regards,

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