Toshiba America Information Systems, Inc.
9740 Irvine Blvd, Irvine, CA
Tel: 1-949-587-6473

To: California Energy Commission

RE: Docket No. 09-AAER-2

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Comments on Draft Proposed Amendments for Battery Chargers

Toshiba provides various products that integrate battery charger function such as notebook PCs, tablet terminals, camcorders, portable DVD-players. Toshiba would like to give following comments from the view point of such "non-dedicated battery charger systems", expecting the Amendments will be fully supported by worldwide stakeholders and will contribute to global warming prevention.

(1) Energy consumed by circuits for primary functions in non-dedicated battery charger systems

1) Proposal

Toshiba proposes that additional allowances considering Off/Standby power of "non-dedicated battery charger systems" are adopted. In this case Toshiba recommends 1 W or 0.5 W harmonizing with EU ErP Lot 6 (Off/Standby power).

Example of a solution Toshiba proposes:

Table W-2 Standard for Small Battery Chargers

Performance Parameter	Standard
24 hour charge and maintenance energy (Wh)	For Eb of 100 Wh or less: (12 + 1.6Eb) x N + 24 x off/standby power (1 or 0.5 W)
	For Eb of between 100 and 1000 Wh: (22 + 1.5Eb) x N + 24 x off/standby power(1 or 0.5 W)
	For Eb of 1000 Wh or greater: (122 + 1.4Eb) x N + 24 x off/standby power(1 or 0.5 W)
Average Battery Maintenance Mode power and No-Battery Mode power (W)	The sum of Average Maintenance Mode power and No-battery Mode power must be less than or equal to: (1+0.0021xEb) x N + 2 x off/standby power(1 or 0.5 W)

2) Background of the proposal

According to the Test Procedures, the big portion of maintenance power and no-battery power is the power consumed by the circuits for primary functions, which has no relation to battery charging function, in case of "non-dedicated battery charger systems". Regarding the notebook PC with a 66 mWh battery pack, for example, the allowance standard defined as the sum of Average Maintenance Mode power and No-Battery Mode power becomes 1+0.0021x 66 = 1.14 W.
This means both

- Off/Standby power (for primary functions) + Average Battery Maintenance Mode power (for battery charger) and
- Off/Standby power (for primary functions) + No-Battery Mode power (for battery charger)

are required around 0.5 W.
Referring to EU ErP Lot 6 Off/Standby power criteria, 1 W from January 2010 and 0.5 W from January 2013, we realize that the Standard allows almost zero W power both for Average Maintenance Mode and No-Battery Mode power. We also realize that in case of "non-dedicated battery charger systems" the Regulations are almost not for battery chargers but for Off/Standby power of various products like ErP Lot 6.

For the purpose of the regulation in order to define criteria for battery charging functions, Off/Standby power consumed by circuits for primary functions not relating to battery charger should be excluded from the allowance Standard defined in Table W-2. One simple solution may be additional allowances considering Off/Standby power for "non-dedicated battery charger systems". Toshiba recommends ErP Lot 6 Off/Standby power for this purpose.

(2) BC-inside-a-circle marking for non-dedicated battery charger systems

1) Proposal

Toshiba proposes that BC-inside-a-circle marking be limited to dedicated battery chargers.

2) Background of the proposal

Toshiba has no doubt that regulating efficiency of battery charger circuits integrated in various products is important even if these are only a small function of the products. However, we don't agree that the BC-inside-a-circle marking on these products should be required, nor, will it be useful information for the consumer.
Currently many products' systems are designed for global markets, which is an important environmental consideration because it contributes to a reduction of stock and service/spare parts. Due to the fact that most products are marketed globally, the logo requirement, such as proposed by CEC would constitutes a defacto wordwide marking of products, not recognized by countries overseas and would be vigorously questioned, unless products destined for California are marked with the logo and the models for the rest of the world are marked differently. Toshiba, at least, requests that the CEC consider confining the BC in a circle marking to dedicated battery charger systems, which would be useful to the consumer, helpful to the environment and less burdensome to the manufacturer.

(3) Product registration for non-dedicated battery charger systems

1) Proposal

Toshiba proposes that product registration is limited to dedicated battery chargers.

2) Background of the proposal

Compared with the number of existing dedicated battery chargers, the number of "non-dedicated battery charger systems" is exponentially larger. Battery charger circuits may be common to a wide range of these products, and if registrations by model would continue to be required, this would result in an incredibly large number of submissions. Toshiba also believes that such registration could be redundant due to the similarity in the circuits and would be very burdensome to manufacturers. We request that the CEC consider not requiring the registration of non-dedicated battery charger systems..

Thank you.