

**DOCKETED**

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*Comment Received From: Japan 4EE industrial associations (CIAJ, JBMIA, JEITA and JEMA)*  
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*Docket Number: 17-AAER-12*

**JP4EE comments on 17-AAER-12 and "Phase 2 Pre-Rulemaking Low Power Mode & Power Factor"**

Japanese 4EE industrial associations™ will submit our comments on Docket Number 17-AAER-12, Request for Additional Public Comments on Low Power Mode Data Collection Procedure to CEC. Please find attached file.

*Additional submitted attachment is included below.*

Dr. Soheila Pasha  
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California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512

Japanese 4EE industrial associations' comments on Docket Number  
17-AAER-12, Request for Additional Public Comments on Low Power Mode  
Data Collection Procedure

Japan 4EE industrial associations;  
CIAJ (Communications and Information Network Association of Japan)  
JBMA (Japan Business Machine and Information System Industries  
Association)  
JEITA (Japan Electronics & Information Technology Industries Association)  
JEMA (The Japan Electrical Manufacturers' Association)

1<sup>st</sup> April, 2019

Dear Dr. Pasha,

We, Japanese electric and electronic industrial associations (CIAJ, JBMA, JEITA and CIAJ) have been vigorously committed to complying with environmental regulations set by several countries and regions, including the U.S., EU, China, etc. Therefore, we appreciate the opportunity to provide further comments in response to the CEC's request for additional public comment for a low power mode data collection procedure.

**General comments :**

**I. Concerns with CEC to introduce its own test procedures  
(measurement methods)**

As described at greater length in JP4EE comments submitted September 13, 2018 in response to CEC Docket No. 17-AAER-12, we are recognizing the standard for test procedures (measurement methods) developed in Europe. Furthermore, in our understand, there are plans to create an IEC international standard regarding test procedures (test methods) of Networked standby

(Standby active, low) based on EN 50643. Therefore, you should wait for the development of an IEC international standard rather than create your own measurement method at CEC.

Almost manufacturers need to deal with regulations of different ways of thinking in EC, US and other countries / regions, and we strongly request to any countries regulatory authority to adopt international standard that it avoid to hinder the sound development of the industry.

## **II. Comments on future discussion on possible energy Efficiency regulations on low power modes**

As already mentioned in our past comments (submitted September 13, 2018 in response to CEC Docket No. 17-AAER-12), If CEC consider the energy efficiency regulation of LPM using this test procedures (measurement method) in future, we would like to ask the products subject to the possible regulation to be decided separately from those covered by the measurement method. In future discussion on this issue, market trends and energy saving effects should be taken into consideration carefully.

In particularly, regarding the low power mode related to the network functions, implementing the network functions are also various types according to the product categories. Even in the same product category, the power consumption is significantly different between products which use functions such as routers and access points and other products. Therefore, if CEC consider the regulations to this matter in future, we strongly recommend that it appropriate to adopt a vertical approach rather than a horizontal approach.

In fact, a vertical approach to regulating the power consumption of products where appropriate is preferred, and should identify product scope ensuring comprehensive studies (incl. effect on network):

- Identify product category specific requirements that may include separate limits, performance / capability adjustments (allowances) etc.
- Minimizes need for exemptions and avoids limits that are set too high, and maximizes efficiency savings.
- Vertical product standards approach when appropriate is more effective and can lead to greater energy savings potential.

**Comments on some questions for TN 226376 Low Power Mode Roadmap Overview and Comments Review:**

*We would like to comment for some questions only as follows,*

**1. Existing Test Procedures**

**Request: Commission staff appreciates updates from stakeholders on progress and release of IEC 63103 and any other relevant test procedures.**

JP4EE Comments/proposals:

There are plans to create an IEC standard for Networked standby (Standby active, low) based on EN 50643. Therefore, you should wait for the development of an IEC standard rather than create your own measurement method at CA.

**2. Testing State**

**Request: Commission staff requests feedback on the definition of terms associated with 2.1 Defining the testing state.**

JP4EE Comments/proposals:

The definitions of IEC 62087-1 Table 1 (Disconnected, Off, Standby-passive, Standby-active low, Standby-active high and Operation) should be used for LPM.

**3. Network Connections**

Request: Commission staff seeks data on the LPM power sensitivity to cable lengths of 10 m, 2 m, and <2m.

JP4EE Comments/proposals:

The test conditions of \*EN 50643 Table A.1 should be used for cable length.

\* See Request 1, Existing Test Procedures.

**4. Network Connections**

Request: Commission staff seeks data on the impact of the distance between product and wireless router on LPM power.

JP4EE Comments/proposals:

The test conditions of \*EN 50643 Table A.1 should be used for distance from wireless reactivation signal source.

\* See Request 1, Existing Test Procedures.

**5. Network Connections**

Request: Commission staff seeks information on what provisions are needed for products with functionality similar to SNE that are not SNE.

JP4EE Comments/proposals:

The equipment classification and examples of \*EN 50643 Annex B should be used for provisions for products with functionality similar to SNE.

\* See Request 1, Existing Test Procedures.

**6. Sensors**

Request: Commission staff also seeks information on the impact of different ambient sound conditions on LPM power.

JP4EE Comments/proposals:

Ambient sound condition should be based on the instruction provided by manufacturer, should not be defined in the standard.

**7. Charging**

Request: Commission staff seeks information on the impact of attaching a fully charged product on the power draw.

JP4EE Comments/proposals:

If a product having a charging function is connected even though the battery is fully charged, it will consume extra power for monitoring charge amount as a maintenance mode. LPM should be measured without a charged product attached.

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**Japanese electric and electronic industrial associations (JP4EE) are:**

CIAJ (Communications and Information Network Association of Japan)  
JBMIA (Japan Business Machine and Information System Industries Association)  
JEITA (Japan Electronics & Information Technology Industries Association)  
JEMA (The Japan Electrical Manufacturers' Association)

**About CIAJ (Communications and Information Network Association of Japan)**

The Communications and Information Network Association of Japan was established in 1948 as a voluntary industry association composed mainly of telecom terminal manufacturers and network infrastructure vendors. In October 2009, CIAJ embarked on a new page in its history by becoming a general incorporated association.

The core Regular Members are manufacturers of telecom equipment, including network devices and mobile handsets, while other industry players, such as telecom operators and solution vendors participate as Forum Members. As part of upholding CIAJ's basic principle of creating new business opportunities and contributing to the robust growth of the industry, we will strengthen our efforts to promote policies and raising awareness of industry positions, attain tangible achievements from committee activities, and enhance our efforts to disseminate information to a wide audience.

<https://www.ciaj.or.jp/>  
<http://www.ciaj.or.jp/en/>

**About JBMIA (Japan Business Machine and Information System Industries Association)**

Japan Business Machine and Information System Industries Association (JBMIA) is the industry organization which aims to contribute the development of the Japanese economy and the improvement of the office environment through the comprehensive development of the Japanese business machine and information system industries and rationalization thereof.

<https://www.jbmia.or.jp/index.php>  
<http://www.jbmia.or.jp/english/index.php>

**About JEITA (Japan Electronics & Information Technology Industries Association)**

The objective of the Japan Electronics and Information Technology Industries Association (JEITA) is to promote the healthy manufacturing, international trade and consumption of electronics products and components in order to contribute to the overall development of the electronics and information technology (IT) industries, and thereby further Japan's economic development and cultural prosperity.

<https://www.jeita.or.jp/japanese/>  
<http://www.jeita.or.jp/english/>

**About JEMA (The Japan Electrical Manufacturers' Association)**

The Japan Electrical Manufacturers' Association (JEMA) consists of major Japanese companies in the electrical industry including: power & industrial systems, home appliances and related industries. JEMA will contribute to sustainable global development through improvement and enhancement of social and living infrastructures by strengthening international competitiveness of Japanese electrical machinery equipment industry.

<http://www.jema-net.or.jp/>  
<http://www.jema-net.or.jp/English/>

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The Japan Electrical Manufacturers' Association (JEMA)