

**From:** Wayne Dieterle <Wayne\_Dieterle@conair.com>  
**To:** "'docket@energy.state.ca.us'" <docket@energy.state.ca.us>  
**Date:** 7/28/2005 7:32:19 AM  
**Subject:** FW: CEC Efficiency Requirements for EPS's - CEC- 400-2005-012, April 2005

> To Whom It May Concern,

>  
> In light of the upcoming requirements for new efficiency requirements for  
> external power supplies (EPS) as set forth by the CEC, Conair, as an end  
> user of many EPS's for a variety of products sold in California and  
> nationally, would like to express our concerns for EPS's that are used  
> solely for purposes of charging batteries. When the original regulation  
> was written, it attempted to exclude EPS's used for battery chargers. Many  
> manufacturers, the EPA and manufacturers groups such as AHAM have been  
> working on a separate regulation(s) to cover battery chargers but there  
> is currently no provision to exclude battery charging EPS's from the  
> existing CEC document reference above. Conair is certainly interested in  
> complying with the CEC's requirements but we feel that it is unfair to  
> include battery charging EPS's into the current requirements as, it seems  
> that the industry and other groups agree that a separate standard for  
> battery chargers is in order. While the existing regulations were proposed  
> a few years ago, Conair was not aware of this until just earlier this year  
> and we would have difficulty to have all our EPS's converted within the  
> prescribed date of 7/1/06.

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> The regulation is designed so that EPS manufacturers would comply and it  
> would be almost transparent to the end user, such as Conair, who buys the  
> EPS to pack with the end product. Attempts were made by the CEC to notify  
> all manufacturers of EPS's so they would comply with the new requirements  
> but there are apparently many smaller suppliers that are still not aware  
> of these requirements. Most all of Conair's suppliers were not aware of  
> these requirements until just a couple months ago and now will be under  
> the gun to redesign their products to comply. It would be most helpful to  
> have the battery charger EPS's excluded so the suppliers could  
> concentrate on the EPS's that are not used as battery chargers. Therefore,  
> we respectfully request that changes be made to the requirements to  
> exclude battery charger EPS's until an appropriate standard can be  
> generated.

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> Please do not hesitate to contact me if there are any questions or  
> concerns regarding the above.

>  
> Sincerely,

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