



ADVANCING GLOBAL COMMUNICATIONS

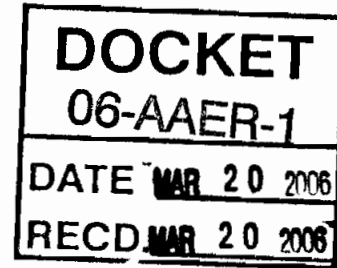
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March 20, 2006

California Energy Commission
Docket No. 06-AAER-1
Docket Unit
1516 Ninth Street, Mail Station 4
Sacramento, CA 95814-5504



Dear Commission:

Attached please find a copy of the March 10, 2006 letter from the Telecommunications Industry Association to the California Energy Commission concerning the effective date of compliance with the new efficiency standards for external power supplies used by wireline telephones. This letter is being submitted for discussion at the March 27, 2006 public hearing of the Energy Commission.

Sincerely,

Bill Belt
Senior Director,
Engineering and Technology Policy
Telecommunications Industry Association



The Telecommunications Industry Association represents the communications sector of





ADVANCING TELECOMMUNICATIONS BUSINESS

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

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March 10, 2006

Ms. Jackalyne Pfannenstiel, Vice Chair
Presiding Member, Efficiency Committee
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Mr. Arthur H. Rosenfeld, Commissioner
Associate Member, Efficiency Committee
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Dear Commissioners Pfannenstiel and Rosenfeld:

This letter is in reference to the California Energy Commission's new efficiency standards for external power supplies. The Telecommunications Industry Association (TIA) has been supporting industry efforts to seek changes in the rules by providing technical information on the negative effect these new rules will have on manufacturers of wireline telephones. Below we provide some additional information on the effective date of compliance for the external power supplies used with wireline telephones.

TIA is the leading trade association for the information and communications technology (ICT) industry. TIA serves ICT suppliers through its leadership in standards development, domestic and international policy advocacy, and facilitating member business opportunities. TIA represents the communications sector of the Electronic Industries Alliance and has over 600 member companies.

Please note the concern we address applies to all ac powered telephones that make a wireline connection to the telephone network. It has frequently been referred to as an issue for cordless telephones, but it also applies to corded telephones where the handset is physically connected to the base and to adjunct answering systems that have no handset. The term wireline telephone is used to indicate any type of telephone that makes a connection to the telephone network by having a wire from the base plugged into a jack on the wall.



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The new efficiency standards specifically applicable to wireline telephone external power supplies, shown in Table U-1 of the standards, were originally scheduled to become effective **July 1, 2006**. On February 15, 2006 the CEC filed a letter with the California Office of Administrative Law requesting a delay in the effective date for external power supplies to **January 1, 2007**. This CEC action is intended to provide industry with enough time to comply with the new standards.

After careful consideration and consultation with leading manufacturers of wireline telephones, TIA strongly encourages CEC to modify its request for an extension on the effective date of power supplies for this class of products to **July 1, 2008**. We believe July 1, 2008 is a more realistic date for compliance.

The technology necessary to make an external power supply compliant with the CEC's new regulations and simultaneously capable of providing wireline telephones acceptable protection from damage caused by lightning induced power line surges is still under development. Safety would be sacrificed if the telephone industry rushes to meet the CEC rules without a reasonable engineering and performance analysis. The wireline telephone manufacturers have only limited experience in a newly developed external power supply that could meet CEC guidelines and withstand lightning induced surges. Finally, the distribution pipeline would take at least an additional year to ensure timely deliveries in adequate quantities of an approved external power supply to the wireline telephone manufacturers. For these reasons, we believe the CEC should modify the effective date for compliance of the power supplies used in these products to **July 1, 2008**.

We look forward to working closely with the CEC on efforts to facilitate compliance with the new regulations. Please contact me or Bill Belt, TIA's Senior Director for Technology and Engineering Policy, if you have any questions or if we can be of assistance.

Sincerely,



Fred A. Lucas
Chairman, User Premises Equipment Division
Telecommunications Industry Association

Cc: Tim Tutt
John A. Wilson
Jim Holland