

Docket Optical System - Bose Corporation: Additional comments on Draft Appliance Efficiency Standards for Battery Chargers and Lighting Controls (Docket Number 09-AAER-2)

From: Steve Whitaker <steve@whitstrategies.com>
To: <docket@energy.state.ca.us>
Date: 3/31/2011 8:20 AM
Subject: Bose Corporation: Additional comments on Draft Appliance Efficiency Standards for Battery Chargers and Lighting Controls (Docket Number 09-AAER-2)
Attachments: Bose Corporation letter to CEC from GC Mark Sullivan re Battery charger regulations--11Mar11.pdf

I am writing to offer an addendum to the comments submitted on March 11, 2011 by Mark Sullivan, General Counsel of Bose Corporation (Docket Number 09-AAER-2, Draft Appliance Efficiency Standards for Battery Chargers and Lighting Controls). This addendum contains information not available when drafting the original comments.

Bose Corporation objects to the maintenance-mode requirement of 0.5W in the proposed regulations, which specifies that for the charging and maintenance mode one should “ensure that user controllable device functionality not associated with battery charging...are turned off.” The 0.5W proposed limit may appear reasonable to comply with if the only function that the device is performing—or is designed to perform—is to charge a battery.

However, the 0.5W proposed limit becomes significantly more difficult to comply with if one considers a complex product such as a rechargeable, battery-powered, compact audio system. In this case, there would be substantial additional circuitry in the unit that operates continuously—whether or not the battery is charging—that would consume more than 0.5W. This requirement is substantiated by the fact that today the CEC regulations for Compact Audio products permit standby power limits of 2.0W for units without a display and 4.0W for units with a display. Although the CEC proposed battery charger test procedure allows for the turning off of all functions not related to battery charging during the battery charger test procedure, the product in question would likely be designed in such a way that those extra functions could not be turned off. In many cases they may, in fact, be integral to the design. The CEC’s proposed regulations would, therefore, prohibit the future sale of such a class of product in California.

Bose Corporation, is also concerned about how the proposed regulations would apply to a portable device which is powered by a rechargeable battery pack, but which can also dock and charge the battery of a third party external device such as an iPod. Would this portable device be forced to meet the requirements of the proposed CEC regulation in the case where the system charges both the battery in the portable device as well as the battery in the external third party device? In the more comprehensive case, how would the CEC regulations treat devices which have USB ports that could be used for charging external third party devices? Would any device with a USB port essentially be considered a battery charger?

Bose Corporation maintains that it is unreasonable to require the inclusion in the battery charger test procedure of any secondary battery system(s) which might attach to a primary battery system where the secondary battery system includes both charger circuitry and battery.”

Thank you,

Stephen Whitaker
 On behalf of Bose Corporation

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Mobile (805) 709-2207
Fax (805) 980-4840

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