

November 15, 2011

**DOCKET**

**11-AAER-2**

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California Energy Commission  
Docket Number 11-AAER-2  
Docket Unit  
1516 Ninth Street, Mail Station 4  
Sacramento, CA 95814-5504  
[Docket@energy.state.ca.us](mailto:Docket@energy.state.ca.us)

**Re: Panasonic Comments on Proposed Amendments to Appliance Efficiency Regulations (Docket No. 11-AAER-2)**

As a world leader in the manufacture of consumer electronics and the market leader in cordless telephones, Panasonic appreciates the opportunity to comment on the California Energy Commission's proposed new regulation of battery chargers (Docket Number 11-AAER-2) and its potential impact on cordless phone design.

**1. Scope of Cordless Phones in Small Charger Proposed Regulations**

**Cordless Phones Functionality**

Cordless telephones and combination products offer an abundance of functionality that go well beyond the battery charging function. Their primary function in providing vital and portable communications services involves a base station that often links to multiple telephone handsets. The base unit monitors incoming calls, monitors the radio link to the handset or multiple handsets for signs of user input, and remains ready for use in outgoing calls; all on a 24 hours daily basis. Telephony combination units also allow for the playback of recorded messages and for the recording of voice memos, and feature a paging or intercom function.

**Cordless Phones Battery Charging On Base Unit Is An "Accessory function"**

The communications functionality is required on an ongoing, 24 hours daily basis. This contrasts with the battery charging function that takes place only when the handset is in the charging cradle and on a limited basis as the unit is split between an active charge function, and a relatively low energy usage, maintenance charge function. Often, the charge function is shut down when the full charge is completed.

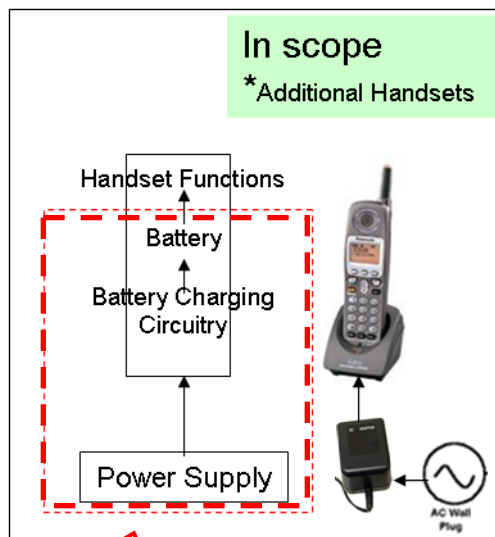
If the CEC intends to regulate power consumption of battery charging systems, Panasonic urges that the Commission consider excluding telephone base units from the Proposed Efficiency Standards for Battery Chargers.

As currently proposed, the test procedure for small BCS's also requires the reporting to include the power consumption of primary functionality (like base units) be added to the consumption of BCS used in cordless phones. However, the primary functionality of a base unit is completely unrelated with the BCS.

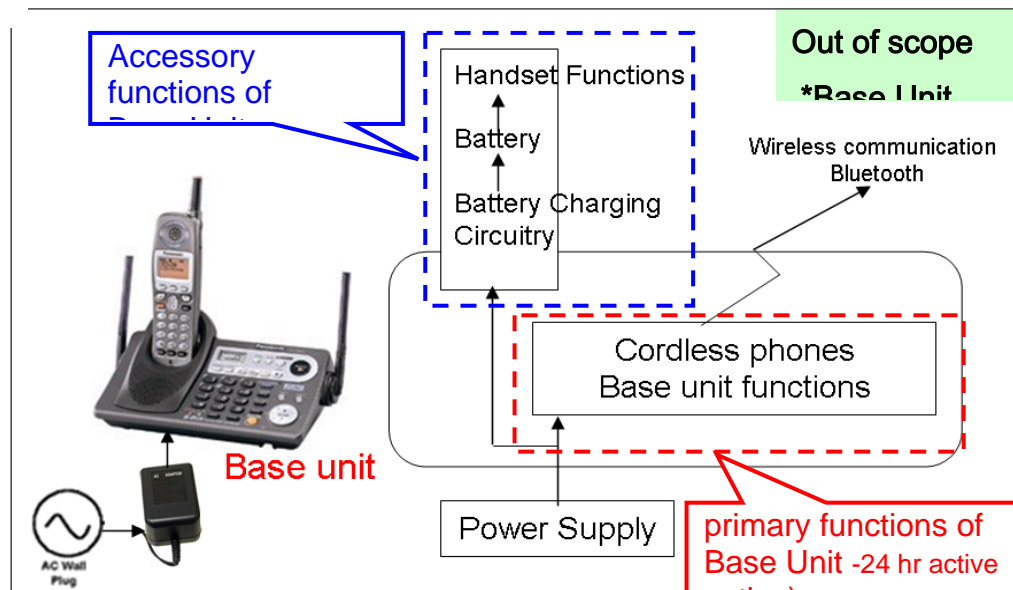
As it is nearly impossible to separate measurement of the primary function from the battery charging function, Panasonic strongly recommends that no restrictions be adopted by the Commission.

In contrast, additional handset units have battery charging as a primary function, unlike the base unit. Thus, it is appropriate to exclude the base units from the BCS requirements.

a. Additional Handset



primary functions of  
Additional Handsets



b. Base Unit

## 2. Recommendation to Separate the Power Consumption of BCS from Primary Function of Base Units

In 10 CFR Section 430.23(aa) (Appendix Y to Subpart B of Part 430)(20011) .

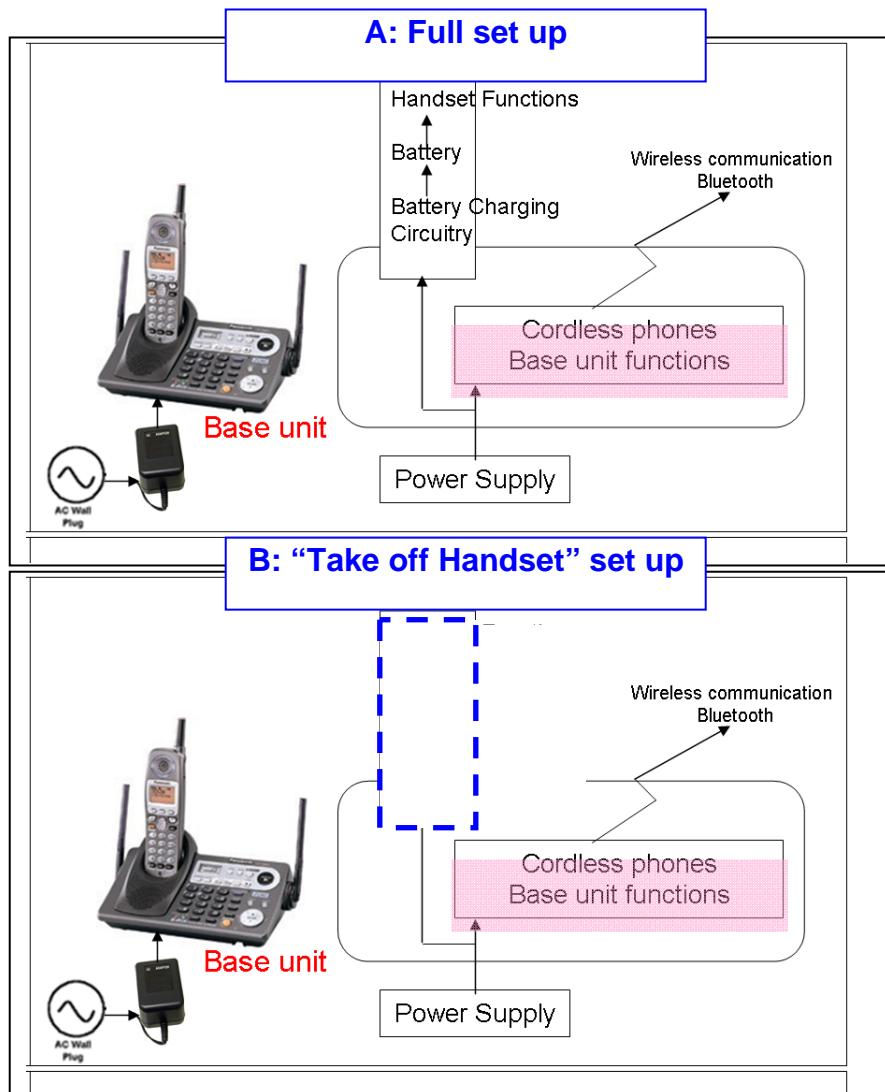
“4.4. Limiting Other Non-Battery-Charger Functions” mentions as follows

b. Any optional functions controlled by the user and not associated with the battery charging process ( *e.g.*, the answering machine in a cordless telephone charging base) shall be switched off. If it is not possible to switch such functions off, they shall be set to their lowest power-consuming mode during the test.

It is very difficult to separate the power consumption dedicated for charging from the power usage needed for other functionality at the same time. There exists no way to disable the circuitry that provides telephone functionality when the battery charger function is active while disconnected from the phone line.

But the only way to know that for the power consumption of "BCS" as described below.

Our understanding is that Cordless Phones Functionality is able to separate from BCS like following test procedure.



Thus, Panasonic's recommends the Commission determine the power consumption of BCS of Cordless Phones base units by :

- 1) Measure power consumption for each set up of A and B , and then
- 2) Calculate power consumption of BCS by formula " $P_a - P_b$ ".  
where  $P_a$ : power consumption at A(Full setup)  
 $P_b$ : power consumption at B("Take off Handset" set up)

Panasonic appreciates the opportunity to comment on the Commission's Docket Number 11-AAER-2. We would welcome the opportunity to further discuss our proposal.

Respectfully,

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cc: Ken Rider, CEC Staff  
Hrinder Singh, CEC Staff