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November 21, 2011

California Energy Commission
1516 Ninth Street
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Re: Notice of Proposed Action: Proposed Amendments to Appliance Efficiency Regulations (Docket No. 11-AAER-2)

The Telecommunications Industry Association (TIA) is pleased to provide comments in response to the Commission's proposed amendments to the appliance efficiency regulations with regard to standards, certification, and labeling requirements for battery charger systems. TIA represents the global information and communications technology industry through standards development, advocacy, tradeshows, business opportunities and market intelligence. For over eighty years, TIA has enhanced the business environments for broadband, mobile wireless, information technology, networks, cable, satellite, and unified communications. TIA's 600 member companies' products and services empower communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military, the environment and entertainment. TIA's members produce the equipment and solutions that make up our Nation's rapidly evolving communications networks and are affected by the proposed requirements for battery charger systems. TIA recommends that the proposed inductive charger systems regulations should be expressly limited to tightly-coupled inductive charger systems. TIA also recommends that the Commission remove the labeling requirement from the regulation for covered products.

The Commission's Proposed Inductive Charger System Regulations Should Be Expressly Limited To Tightly-Coupled Inductive Charger Systems

Mandated energy efficiency standards are most effective with mature technologies where the future of the technology and competing technologies are well understood, the pathway to efficiency gains is clear, and the functionality of the product is not in a state of flux. Applying mandatory efficiency standards to new or immature technologies such as loosely-coupled inductive charger systems hampers innovation and is counterproductive to the goal of increasing efficiency. The Commission should limit any rules for wireless charger systems to tightly-coupled inductive charger systems. In contrast to loosely-coupled inductive charger systems that offer highly desirable freedom of placement during charging, tightly-coupled inductive charger systems require strict alignment between the charger and battery-powered device and often use magnets to align the device during charging. The statement made by Commission consultant Ecova at the October 24, 2011, hearing (*see* hearing transcript at 71-73) that they examined loosely coupled charging systems is not correct – tightly-coupled charger systems were the only type of wireless chargers that were considered. In fact, loosely-coupled wireless charging systems are not yet on the market and are in active development by a number of technology companies.

Unfortunately, the Commission's proposed regulations broadly cover all types of inductive charger systems, including loosely-coupled wireless charger systems that are first expected to be made available for sale in the 2012-13 timeframe. This new class of wireless chargers should be exempted at this time from the proposed regulations to enable continued research and development into this vibrant area and to support the attainment of important public interest benefits.

Loosely-coupled wireless charging technology, which is rapidly developing, will allow the simultaneous and independent charging of multiple battery-powered devices simply by placing the devices in any position on a charging pad or properly equipped surface, such as a table-top or automobile dashboard console. In this way, loosely-coupled wireless charging systems will offer consumers more convenient charging options and eliminate the need for consumers to maintain separate power adapters for multiple devices, thereby limiting waste. For these reasons, TIA requests that the Commission not unduly restrict the development of new technology, namely loosely-coupled wireless charging technology. The Commission should limit its proposed rules for inductive charger systems to tightly-coupled systems – the only wireless charging systems that the Commission considered in developing its proposed rules.

The Commission Should Not Impose a Labeling Requirement for Covered Products

Product labeling requirements should be evaluated by balancing the cost and resources required to add the label in the manufacturing process versus the benefit derived from the content of the label being placed directly on the device. Each label requirement potentially adds an additional step to the product manufacturing process, increases production costs and consumes additional energy and resources. In this case, a label would act as a declaration of compliance with a mandatory standard. This purpose is more efficiently achieved by including statements of compliance in documentation accompanying the product rather than mandating the addition of a new label to the product.

Respectfully signed and submitted on November 21st, 2011.

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

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