



**QUALCOMM Incorporated**

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November 21, 2011

**Via Overnight Mail and E-Mail**

California Energy Commission  
Docket No. 11-AAER-2  
Docket Unit  
1516 Ninth Street, Mail Station 4  
Sacramento, CA 95814-5504

Email: [Docket@energy.state.ca.us](mailto:Docket@energy.state.ca.us)

**DOCKET**

**11-AAER-2**

DATE Nov. 21 2011

RECD. Nov. 22 2011

**Re: Notice of Proposed Action – Proposed Amendments To Appliance Efficiency Regulations (e.g., Battery Charger Systems) – CEC Docket No. 11-AAER-2**

Dear Madam/Sir:

QUALCOMM Incorporated (“Qualcomm”) respectfully submits this letter to: (1) reiterate points made in its October 19<sup>th</sup> Comments in this proceeding relating to loosely-coupled inductive charging technology,<sup>1</sup> and (2) to correct statements that Ecova made at the October 24, 2011, hearing held by the California Energy Commission (“CEC”) on the Notice of Proposed Action in Docket No. 11-AAER-2, Proposed Amendments To Appliance Efficiency Regulations.<sup>2</sup>

**1) The Proposed Regulation Of Inductive Charger System Needs To Be Limited To Tightly-Coupled Systems**

In its October 19<sup>th</sup> Comments, Qualcomm detailed why the CEC must exempt from regulation loosely-coupled wireless charging systems that a number of technology companies (including Qualcomm) are actively developing. The proposed CEC regulations for inductive charging systems would apply equally to tightly-coupled and loosely-coupled inductive charging systems – even though the CEC has not examined any loosely-coupled systems in this proceeding (nor could it for these systems are not yet on the market). As Qualcomm explained, premature regulation of loosely-coupled inductive charging technology would affect the timely introduction of this novel technology in California and could prevent the technology from ever being made available for sale in the state.

Loosely-coupled wireless charging systems will provide a number of important public interest benefits. For example, these systems will allow consumers to simultaneously and independently charge multiple battery-powered devices, such as smartphones, hearing aids, handheld gaming devices, and tablet computers, simply by placing them anywhere on a charging pad or properly-

<sup>1</sup> See Qualcomm Comments in CEC Docket No. 11-AAER-2 (Oct. 19, 2011) attached hereto ( hereinafter, the “October 19<sup>th</sup> Comments”).

<sup>2</sup> See CEC Appliances and Process Energy Office Public Hearing Battery Chargers and Self-Contained Lighting Controls (Oct. 24, 2011), Transcript at 71-73 *available at* [http://www.energy.ca.gov/appliances/battery\\_chargers/documents/2011-10-24\\_hearing/2011-10-24\\_transcript.pdf](http://www.energy.ca.gov/appliances/battery_chargers/documents/2011-10-24_hearing/2011-10-24_transcript.pdf).

equipped table, desktop, or vehicle dashboard console. Consumers will no longer need to physically connect (and disconnect) each of their portable electronic devices to a separate power adapter that plugs into the local ac outlet. Loosely-coupled wireless charging technology eliminates the need for individual power adapters for each device and the environmental concerns associated with their disposal. Even more importantly, given the increased opportunities for charging, there will be a much greater likelihood that the wireless phone will be charged when an emergency call needs to be placed.

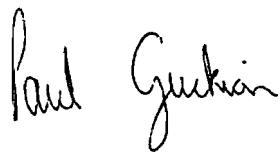
Accordingly, Qualcomm respectfully requests that the CEC exempt from the proposed regulations a brand new class of battery chargers based upon loosely-coupled inductive charging technology. Mandated efficiency standards are most effective where the state of the technology is well understood, mature, and stable, and the pathway to efficiency gains is clear. In contrast, prematurely mandating efficiency requirements on developing technologies like loosely-coupled inductive charging hampers innovation and is counterproductive.

## **2) Contrary To Statements Made At The October 24<sup>th</sup> Hearing, Loosely-Coupled Inductive Charger Systems Have Not Been Examined During This Rulemaking**

The statement made by CEC consultant Ecova at the October 24, 2011, hearing that loosely-coupled inductive charging systems were analyzed<sup>3</sup> is not correct. Tightly-coupled systems were the only type of wireless chargers that were examined. As Qualcomm made clear in its October 19<sup>th</sup> Comments, loosely-coupled wireless charging systems are still under active development by a number of technology companies and are not yet available for sale.

In order to allow Qualcomm and other technology developers that are actively working on loosely-coupled wireless charging systems to bring the useful technology to market in California in a timely manner, Qualcomm respectfully requests that the CEC exempt from the proposed battery charger regulations loosely-coupled wireless charging systems. The CEC should limit its proposed regulation of inductive charger systems to tightly-coupled systems, which were the only type of wireless charging systems that the CEC and its consultants examined.

Respectfully submitted,



Paul Guckian  
Vice President – Engineering Regulatory  
QUALCOMM Incorporated

Att. – Qualcomm October 19, 2011 Comments

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Kenneth Rider via e-mail [krider@energy.state.ca.us](mailto:krider@energy.state.ca.us)

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<sup>3</sup> See *id.*