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January 3, 2012

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814  
[Docket@energy.state.ca.us](mailto:Docket@energy.state.ca.us)

## DOCKET

11-AAER-2

DATE JAN 03 2012

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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 additional 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, tradeshow, 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 remains concerned about the proposed regulations applying to new technologies, specifically loosely-coupled inductive charger systems. TIA recommends that at this time the proposed inductive charger systems regulations should be expressly limited to tightly-coupled inductive charger systems. TIA also believes that the improved language for the labeling requirement still imposes unnecessary cost as a statement of compliance that can be achieved without expense through the certification process or in documentation accompanying the product.

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

Mandating standards on new, immature technologies restricts innovation, limiting the functionality that the technology can achieve. TIA recommends that the Commission exempt loosely-coupled battery charger systems from the proposed regulations. Loosely-coupled wireless charging systems are not yet on the market and are in active development by a number of technology companies.

Loosely-coupled wireless charging systems are expected to transform how consumers charge their various electronics devices by providing the convenience of charging multiple devices from a single station. Rather than plugging multiple chargers or power adapters into multiple outlets, loosely coupled wireless charging systems will allow consumers to wirelessly charge a cell phone, a camera, a pair of hearing aids, a music player, a tablet, and other battery-powered devices at the same time at a single

station. In this way, loosely coupled systems can alleviate consumers' need to maintain separate chargers for every battery-powered device they own. By providing consumers with more convenient charging options, it will help to ensure that devices are charged when they are needed most.

**The Commission Should Not Impose a Labeling Requirement for Covered Products**

The cost and resources required to add a label to the product or packaging outweighs the benefits. 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. Given the additional reporting requirements to verify compliance, this purpose is more efficiently and appropriately achieved by including statements of compliance in documentation accompanying the product rather than mandating the addition of a new label to the product or packaging.

Respectfully signed and submitted on January 3<sup>rd</sup>, 2012.

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

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