

January 14, 2011

Ms. Katharine Kaplan  
ENERGY STAR Product Development  
U.S. Environmental Protection Agency  
ENERGY STAR for Battery Charging Systems  
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Washington, DC 20450  
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Re: Comments on ENERGY STAR BCS Draft 1, Version 2.0

Dear Ms. Kaplan:

Panasonic Corporation of North America (“Panasonic”), a market leader in the manufacture and sale of cordless telephones and other telephony devices, appreciates the opportunity to comment on EPA’s proposal to significantly alter the ENERGY STAR program’s application to telephone products. By proposing to eliminate the ENERGY STAR Telephony Products program and fold cordless phones into the Battery Chargers specification, EPA, unfortunately, ignores the basic communications functionality provided by telephony products.

### **Cordless Phones Functionality**

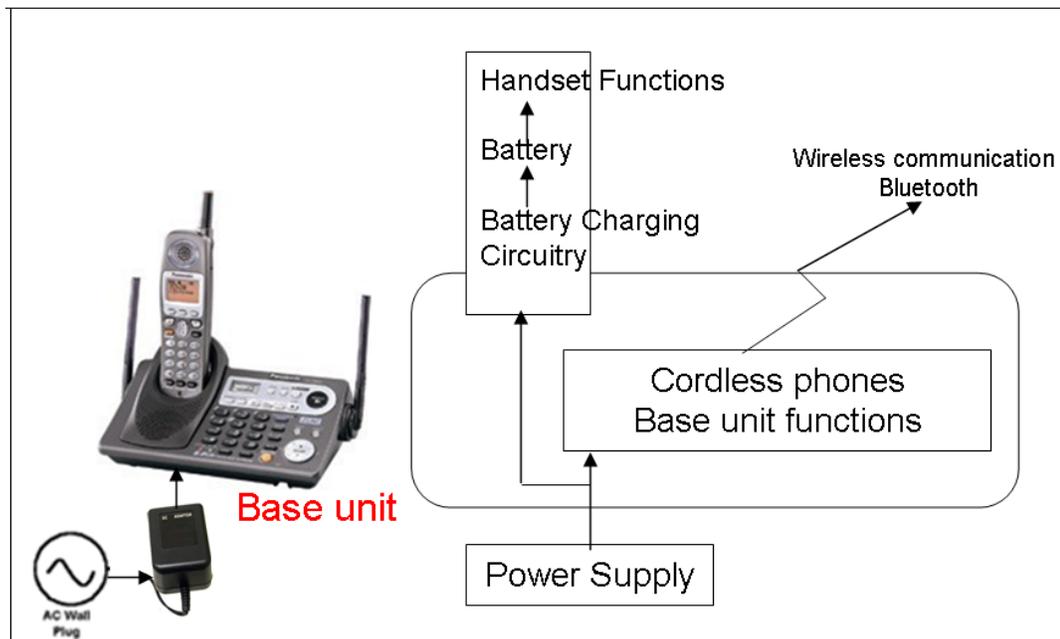
Cordless telephones and combination products offer an abundance of functionality that goes well beyond battery charging. Their primary function in providing vital and portable communications services involves a base station and often links to multiple telephone handsets. Indeed, the base unit monitors 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 allow for the recording of voice memos, and a paging or intercom 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.

### **Recommendation to Separate Base Units from BCS Specification**

Despite suggestions to the contrary, it is very difficult to separate the power consumption dedicated for changing from the power usage needed for other functionality. 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.

Rather than require telephone manufacturers to develop a new and complex procedure to remove telephone circuitry for external testing purposes, Panasonic recommends the EPA consider excluding telephone base units from the new ENERGY STAR Draft 1 Version 2.0 Battery Chargers specification.



The BCS draft 1 version 2.0 specification, in setting UEC requirements to be applied to telephony products, seems to ignore the existence of additional handsets and their widespread usage by consumers. Additional handset units, in fact, have battery charging as a primary function, unlike the base unit. Thus, it is appropriate to exclude the base units from the BCS requirements.

### Specific Comments on Qualification Criteria

Panasonic is concerned over a number of profile parameters used to calculate the Unit Energy Consumption (UEC) during testing. Among our specific concerns:

#### 1) Active and Maintenance Time

$t_{AM}$  (hr/day)                      9.7    -->                      23.5

Active and Maintenance time  $t_{AM}$  is listed as 9.7 hours on Draft.

In case of wireless handset for the cordless telephone, "talking time" is assumed 0.5 hour. Therefore, Active and maintenance time is assumed 23.5H.

#### 2) No-Battery Time

$t_{NB}$  (hr/day)                      5        -->                      0.5

In case of wireless handset for the cordless telephone, "talking time" is assumed 0.5 hour.

Therefore, No-Battery time will is assumed 0.5H. (No-Battery time is same as talking time.)

### 3) Unplugged Time

$t_U$  (hr/day)                      9.4              -->              0

Base unit of Cordless Telephone connected to a fixed telephone line is plugged into an AC power outlet for 24 hours a day.

Therefore, unplugged-time should be zero.

### 4) Profile Parameters times

The total time of Profile Parameters times is not 24 hours.

Total time of DOE Product Class 2 in Table 1 is 24.1H.

Total time of DOE Product Class 4 in Table 1 is 27.1H.

These time must be corrected.

**Table 1**

DOE Product Class	Battery Energy, $E_B$ , as Measured in the Test Method (watt-hours)	Rated Battery Voltage, $V_B$ , (volts)	Active and Maintenance Time, $t_{AM}$ (hr/day)	No-Battery Time, $t_{NB}$ (hr/day)	Unplugged Time, $t_U$ (hr/day)	Off Time, $t_O$ (hr/day)	Number of Charges Per Day, $N_C$
2	$E_B \leq 100$	$V_B \leq 4$	9.7	5	9.4	0	0.56
3	$E_B \leq 100$	$4 < V_B \leq 10$	5.6	0.2	18.1	0.1	0.22
4	$E_B \leq 100$	$V_B > 10$	19.8	0.3	6.9	0.1	0.88
5	$100 < E_B \leq 3000$	$V_B \leq 20$	7.7	0.5	15.8	0	0.55
6	$100 < E_B \leq 3000$	$V_B > 20$	15.4	8.6	0	0	0.46

### Number of Units Required for Testing

In Section 4.2.2, three randomly chosen units are required for testing. This requirement seems excessive as safety testing of telephony products only requires a single unit. Panasonic recommends this requirement be modified to require only one unit be tested.

### Recommitment Requirement Included ENERGY STAR Telephony Program

Panasonic was surprised and dismayed that EPA did not consult with its leading telephony products ENERGY STAR manufacturer partner prior to announcing the proposal to eliminate the telephone category. In fact, Panasonic and other telephony products manufacturers were required to formally “recommit” in writing their intention to abide by the new program qualification requirements beginning in January 2011 several weeks prior to release of the BCS draft 1 version 2.0 specification.

Thus, EPA signaled its intention to continue the ENERGY STAR Telephony Products program only to reverse course a short time later, announcing its plan to terminate the stand-alone telephony products program. This lack of communication with key manufacturer partners is cause for concern at Panasonic.

In summary, Panasonic continues to be a strong proponent of the ENERGY STAR program across our diverse portfolio of qualifying products including televisions, displays, home audio and video products, set top boxes, cordless phones, notebook computers, imaging products, and ventilation fans. We believe strongly that the ENERGY STAR program, in conjunction with its manufacturing partners like Panasonic, has been tremendously successful in bringing ever more efficient products to consumers. The qualifying criteria for telephony products and their accompanying external power supplies, in particular, has led to the introduction of highly efficient products.

With the ongoing success of the telephony products specification, Panasonic recommends the products not be folded into a larger BCS specification, or at minimum, that telephony base unit products be excluded.

We welcome the opportunity to further discuss our views on the BCS draft 1 version 2.0 specification.

Sincerely,

Mark Sharp  
Group Manager  
Corporate Environmental Department

Cc: Matt Malinowski (mmalinowski@icfi.com)