



TELECOMMUNICATIONS
INDUSTRY ASSOCIATION

1320 N. Courthouse Rd., Suite 200
Arlington, VA 22201 USA
www.tiaonline.org

Tel: +1.703.907.7700
Fax: +1.703.907.7727

**BEFORE THE UNITED STATES
DEPARTMENT OF ENERGY**

IN THE MATTER OF ENERGY
CONSERVATION PROGRAM: TEST
PROCEDURES FOR EXTERNAL POWER
SUPPLIES

Docket No. EERE-2014-BT-TP-0043-0001
RIN No. 1904-AD36

**COMMENTS OF THE TELECOMMUNICATIONS INDUSTRY ASSOCIATION
REGARDING ENERGY CONSERVATION PROGRAM: TEST PROCEEDURES FOR
EXTERNAL POWER SUPPLIES**

I. INTRODUCTION

The Telecommunications Industry Association (TIA) appreciates the opportunity to provide comments in response to the Notice of Proposed Rulemaking (NOPR) regarding proposed revisions to the test procedure for external power supplies.¹ TIA represents hundreds of information and communications technology (ICT) manufacturer, vendor, and supplier companies in standards, government affairs and market intelligence. TIA's member companies' products and services empower communications in every industry and market, including healthcare, education, security, public safety, transportation, energy, government, the military, and entertainment.

¹ See U.S. Department of Energy, Energy Conservation Program: Test Procedures for External Power Supplies: Notice of Proposed Rulemaking, Fed. Reg. 2014-24180 (Oct. 9, 2014), available at: www.regulations.gov/#!documentDetail;D=EERE-2014-BT-TP-0043-0001.

A major function of TIA is the writing and maintenance of voluntary industry standards and specifications, as well as the formulation of technical positions for presentation on behalf of the United States in certain international standards fora. TIA is accredited by the American National Standards Institute (ANSI) to develop voluntary industry standards for a wide variety of telecommunications products and sponsors more than 70 standards formulating committees. These committees are made up of over 1,000 volunteer participants, including representatives from manufacturers of telecommunications equipment, service providers and end-users, including the government. The member companies and other stakeholders participating in the efforts of these committees and sub-groups have produced more than 3,000 standards and technical papers that are used by companies and governments to produce interoperable products around the world. TIA's members produce the equipment and solutions that make up our Nation's rapidly evolving communications networks and are directly impacted by revisions proposed to the test procedure for external power supplies. TIA offers the following input regarding questions raised in the NOPR.

In previous comments to the DOE, TIA has emphasized the need to align DOE standards with existing industry standards, and we agree with proposed changes to the test procedure that harmonize the DOE test procedure for external power supplies with industry standards, specifically IEC 62301. TIA also believes that additions should not be made to the test procedure unless the benefits of the changes are clearly supported. In terms of additional revisions, TIA does not see adequate support at this time to include an optional test to measure the active-mode efficiency at a 10% loading condition and an optional recording of power factor measurements.

II. DISCUSSION

1. TIA RECOMMENDS THAT THE TEST PROCEDURE SHOULD NOT INCLUDE AN OPTIONAL PROCEDURE FOR MEASURING ACTIVE-MODE EFFICIENCY OF A UNIT UNDER TEST AT 10 PERCENT LOADING.

The NOPR proposes to add an optional procedure for measuring the active-mode efficiency of a unit under test that would occur at the 10 percent loading condition. The stated objective of this revision is to gain a broader understanding of EPS efficiency at low load levels. TIA does not believe that the benefits of this additional test are supported by data. While reporting of test results of this loading condition would not be required as part of the compliance certification, TIA does not believe the optional test should be added to the test procedure unless there is data to support its inclusion.

2. TIA RECOMMENDS THAT THE TEST PROCEDURE EXCLUDE OPTIONAL POWER FACTOR TESTING AT EACH LOAD CONDITION AT THIS TIME.

The NOPR also proposes to add a provision for the optional reporting of power factor measurements. Similarly to 10% load testing, the stated objective of the optional test is to gather additional data to gain a broader understanding of EPS efficiency. TIA does not believe the inclusion of power factor testing in the test procedure is adequately supported. Expanding the scope of the external power supply rulemaking to power distribution as opposed to product efficiencies introduces a level of confusion into a rulemaking that should be focused on product efficiencies. Varying length of transmission wires, conditions surrounding transmission lines, input impedance and other factors create a large degree of variability in measuring and repeating power factor measurements. Any benefit of measurements of power factor below 100 watts is

also not supported. TIA recommends that power factor measurements, even on an optional basis, be excluded from the test procedure at this time.

III. CONCLUSION

TIA appreciates the opportunity to provide input and looks forward to working with the Department of Energy and other stakeholders on these issues in the future.

Respectfully signed and submitted on December 23, 2014.

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

/s/ DANIELLE COFFEY

Danielle Coffey
Vice President
Government Affairs

Joseph Andersen
Director, Technology & Innovation Policy
Telecommunications Industry Association
1320 N. Courthouse Rd., Suite 200
Arlington, VA 22201
jandersen@tiaonline.org