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**TELECOMMUNICATIONS
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Mr. Paul Karaffa
ENERGY STAR Product Development
U.S. Environmental Protection Agency
Energy Star for Office Equipment
1200 Pennsylvania Avenue, N.W.
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Re: ENERGY STAR Telephony Draft 2 Version 3.0 Telephony Test Method
and Data Call

Dear Mr. Karaffa:

The Telecommunications Industry Association (TIA) hereby submits its comments on
ENERGY STAR Telephony Draft 2 Version 3.0 Telephony Test Method and Data Call.¹

I. INTRODUCTION

TIA represents the global information and communications technology industry through standards development, advocacy, tradeshow, business opportunities and market intelligence. TIA's hundreds of member companies' products and services empower communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military and entertainment. Our members work through TIA's voluntary, consensus-based process to enhance the business environment for telecommunications, broadband, mobile wireless, information technology, networks, cable, satellite, unified communications, emergency communications and the sustainability of technology.

TIA's TR-41 Engineering Committee (User Premises Telecommunications Requirements) develops voluntary standards for telecommunications terminal equipment and systems, specifically those used for voice services, integrated voice and data services, and

¹ Draft 2 V3.0 Energy Star Telephony Test Method available at <http://energystar.gov/products/specs/node/154>.

Internet protocol (IP) applications. Together with its three subcommittees and their working groups, the committee develops performance and interface criteria for equipment, systems and private networks, as well as the information necessary to ensure their proper interworking with each other, with public networks, with IP telephony infrastructures and with carrier-provided private-line services. In addition, TR-41 develops criteria for preventing harm to the telephone network, which become mandatory when adopted by the Administrative Council for Terminal Attachments (ACTA). The committee is also engaged in providing input on product safety issues, identifying environmental considerations for user premises equipment and addressing the administrative aspects of product approval processes. TIA is accredited by the American National Standards Institute (ANSI). Of particular relevance to this proceeding, many TIA members, including those who participate in TR-41 standards activities, produce telephony products implicated by the revised draft ENERGY STAR telephony test method.

TIA members have long been supporters of the ENERGY STAR program and commend the program's outreach to industry to ensure that the requirements of the ENERGY STAR program evolve to reflect developments in technologies while enabling our companies to innovate best-in-class technologies. TIA's members greatly value the ENERGY STAR certification, and rely on this certification to market their products to retailers and consumers. ENERGY STAR has played a critical role in providing incentives and rewarding the production of energy efficient technologies. TIA believes that the current certification criteria for telephony products has cultivated a competitive environment for manufacturers as well as furthered the EPA's ENERGY STAR program's efforts through the implementation of practicable and reasonable qualification efficiency requirements. Generally, the fact that many manufacturers' products meet the ENERGY STAR certification today should not necessarily suggest that

thresholds are outdated or ineffective. TIA believes that this is instead an indication of a successful and dynamic partnership between the EPA, DOE, and the manufacturers to increase the energy efficiency of products. Maximum consumer benefit will occur if the ENERGY STAR program continues to implement realistic and achievable standards that enable recognition of and the associated awards for innovation through certification.

TIA appreciates the consideration and inclusion of TIA's input from our two previous comments into the most recent Draft 2 Version 3.0 for telephony.² We believe the most recent draft is significantly improved and look forward to TIA's continued work with the ENERGY STAR program in providing consensus industry views on how the program can best meet the needs of industry in recognizing energy efficiency. TIA makes the following additional recommendations regarding the testing of additional handsets of multi-handset cordless telephones as well as miscellaneous recommendations to further clarify the document.

II. DISCUSSION

1. TIA recommends inclusion of additional handsets of multi-handset cordless telephones as a continuing category in the ENERGY STAR program, testing additional handsets in Partial On (Sleep Mode).

As currently written, Draft 2 Version 3.0 does not provide for the testing of additional handsets of multi-handset cordless telephones. Multi-handset cordless telephones would be tested twice, once without any additional handsets and once with all additional handsets that are shipped together with the unit linked to the system but on-hook. In both cases, only the energy usage of the base unit is to be measured and reported, leaving a gap in the test procedure

² Comments of the Telecommunications Industry Association (TIA) Regarding ENERGY STAR Telephony Specification available at:
http://energystar.gov/products/specs/sites/products/files/TIA_ES_Draft%201_Telephony_Test%20Method_Comments_1.pdf
http://energystar.gov/products/specs/sites/products/files/TIA_ES_Draft%201_Telephony_Test%20Method_Comments_2.pdf

addressing the power usage by an additional handset and its charger unit. Cordless telephones are often sold with additional handsets, and consumers are also able to buy additional handsets to expand a previously purchased system. To maintain coverage of additional handsets in the Energy Star Telephony program, TIA recommends that additional handsets be tested in Partial On (Sleep) Mode.

It would be relatively simple to add an additional test of the energy used by a handset and its charger during the Partial On (Sleep) Mode measurements when the base unit is being tested with all associated handsets linked to it. Assuming all of the additional handsets are of the same model (which is the most likely scenario), only one of them would have to be tested. If more than one model of additional handset is to be included in the package, then one handset of each type would need to be tested. The qualification procedure for being able to put the Energy Star mark on the product packaging would then be that the base unit meet its requirement and that each additional handset included in the package also meet its requirement. The additional handset would be tested in the Partial On (Sleep) Mode when configured as part of a system as described above. The additional handset could also be sold separately for system expansion purposes with the Energy Star mark on its packaging.

2. TIA also recommends the following minor edits and clarifications.

Line 40--The definition for Cellular Telephone in line 40 currently reads: “A Telephone that converts sound into multiple-access (e.g., Code-Division Multiple Access (CDMA)) packets for transmission to a cellular.” The term “network” should be added to the end of the sentence so that it reads “...transmission to a cellular network.” We also suggest that the parenthetical reference in lines 40 & 41 to CDMA be dropped or that GSM and possibly LTE be added inside the parentheses in addition to CDMA.

Line 54-- “Wireless Telephone” has been defined in line 54 as using a WiFi connection to a network. We suggest the term be changed to “Wireless (WiFi) Telephone”.

III. CONCLUSION

TIA appreciates the opportunity to provide additional comments and looks forward to continuing to work with EPA and DOE on the ENERGY STAR program in product categories in the ICT industry.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

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