



February 29, 2012

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**Re: TIA Comments on Developing FAQs for Implementing Battery Chargers Regulations**

The Telecommunications Industry Association (TIA) is pleased to provide the following recommendations for consideration by the Commission for inclusion in the FAQ document for the newly adopted regulations regarding battery charger systems. TIA believes the following proposed FAQs will assist with implementation of the regulations.

**FAQ:** What are the equations to be used when calculating watt-hours for 24 hour charge and maintenance mode, and watts for maintenance and no battery mode?

**Response:** The full equations with units looks like this:

Maintenance Mode Power [watts] + No Battery Mode Power [watts] must be  $\leq 1$  [Watt/port] x N [ports] + 0.0021 [Watt/watt-hour] x Eb [watt- hours]

24 hour charge and maintenance energy [Watt-hours] must be  $\leq 12$  [Watt-hours/port] x N [ports] + 1.6 [Watt-hours/Watt-hour] x Eb [watt- hours]

The unit Watt/watt-hour represents a scaling factor for power needed based on the capacity of a battery. The unit watt-hour/watt-hour is really an efficiency ratio and perhaps could be re-written as watt-hours used/watt-hours stored.

Please follow the methodology in the procedure, it is available here:

[http://www.energy.ca.gov/appliances/battery\\_chargers/documents/reference/10CFR430\\_Sub\\_B\\_Apnd\\_Y.pdf](http://www.energy.ca.gov/appliances/battery_chargers/documents/reference/10CFR430_Sub_B_Apnd_Y.pdf) (See Sections 5.9 and 5.11.) The maintenance power is typically measured by taking the energy consumed over the last four hours of the test and dividing it by 4.

**FAQ:** Do loosely-coupled inductive chargers fall under the scope of the regulation?

**Response:** No, these devices do not meet the definition of battery charger systems and fall outside the scope of the regulation.

See CEC, January 21, 2012 Business Meeting Transcript at Page 121, *available at* [http://www.energy.ca.gov/business\\_meetings/2012\\_transcripts/2012-01-12\\_transcript.pdf](http://www.energy.ca.gov/business_meetings/2012_transcripts/2012-01-12_transcript.pdf).

Thank you for your consideration.

Respectfully signed and submitted on February 29, 2012.

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

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