



Mr. Andrew Fanara
EPA Product Manager
ENERGY STAR Product Development
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N. W.
Mail Code: 6202J
Washington, DC 20460

September 11, 2008

Dear Mr. Fanara:

The Telecommunications Industry Association (TIA) hereby submits its comments in response to the U.S. Environmental Protection Agency (EPA) proposal, dated August 29, 2008, amending the Version 2.0 ENERGY STAR telephony specifications to state that an external power supply (EPS), used in conjunction with ENERGY STAR qualified telephony products, would not be required to meet the ENERGY STAR No-Load requirement of 0.3 or 0.5 watts. This amendment would clarify that the EPA's ENERGY STAR No-Load Energy requirements do not apply to telephony products.

Currently in its 84th year, the Telecommunications Industry Association represents the global information and communications technology (ICT) industry through standards development, advocacy, business opportunities, market intelligence and world-wide environmental regulatory compliance. Thousands of companies and individuals work

through TIA to enhance the business environment for telecommunications, broadband, mobile wireless, information technology, networks, cable, satellite, unified communications, emergency communications and the greening of technology. TIA is accredited by the American National Standards Institute (ANSI).

Of particular relevance to this proceeding, many TIA members produce products implicated by the proposed amendment, including cordless phones, answering machines, and combination cordless phones and answering machines. These products do not experience No-Load situations. In fact, they always have active circuitry drawing current from the EPS, monitoring the telephone line for incoming ringing signals and, in the case of cordless telephones and combination cordless phones and answering machines, powering a radio that must maintain frequent communication with a cordless handset in order to detect an off-hook request by a user wishing to place a call. Accordingly, the EPS No-Load criteria are currently imposed upon, yet irrelevant for, cordless phones, answering machines, and combination cordless phones and answering machines.

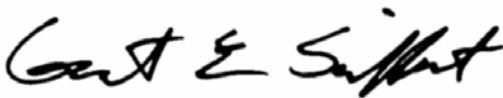
Moreover, the Version 2.0 EPS criteria that become effective for telephony products on November 1, 2008 do not change the No-Load requirement for ac supplies, but require dc supplies not to exceed 0.3 watts. These more stringent requirements virtually eliminate any possibility of using a linear dc EPS for cordless phones, answering machines, and combination cordless phones and answering machines.

Under the August 29, 2008 proposal, the EPA would amend the Version 2.0 ENERGY STAR telephony specifications, stating that “external power supplies used in conjunction

with telephony products do not need to meet the No-Load requirement of 0.3 or 0.5 watts, depending on type of external power supply (ac-ac or ac-dc) and nameplate output power (unless otherwise required by federal standard).” This amendment would, in effect, appropriately eliminate the ENERGY STAR No-Load requirements of 0.3 or 0.5 watts for cordless phones, answering machines, and combination cordless phones and answering machines, although both types of supplies would still be limited to 0.5 watts by Federal regulations. Further, eliminating the need to comply with the 0.3 watts No-Load criteria allows for the possibility of using linear EPS with ENERGY STAR telephony products.

For the reasons detailed above, TIA urges the EPA to adopt its August 29, 2008 proposed amendment to the Version 2.0 ENERGY STAR telephony specifications. TIA appreciates the EPA’s initiative on this important matter, and looks forward to working with the EPA on this and other issues vital to the ICT industry.

Sincerely,

A handwritten signature in black ink, appearing to read "Grant E. Seiffert". The signature is written in a cursive, flowing style.

Grant Seiffert
President