

April 19, 2012

To: Docket Number EERE-2008-BT-STD-005

From: Ric Erdheim, Senior Counsel, Philips Electronics

Re: Ex Parte Communication

Participants: Peter Shreve and Ric Erdheim, Philips Electronics
Vic Petrolatti, DOE
Michael Kido, DOE General Counsel Office
Matt Nardotti, Navigant Consulting

Discussion: Philips staff asked a series of questions regarding the application of the test procedure and the proposed standard for class I inductive charge battery chargers.

- 1) Philips asked whether based on statements in the TSD it would be technically feasible for appliances with Ni based batteries to meet the proposed Class 1 (inductive connection) standard. DOE staff said the proposed standard is not a technology based standard so that any technology that met the standard was permissible but DOE staff was unaware of any technologies that would allow the use of nickel based batteries in compliance with the proposed standard. DOE staff said the Philips could comment on the cost of shifting to lithium ion batteries or any loss of utility from such a shift.
- 2) Philips asked whether the energy used to power LEDs that show battery charge level must be included in the energy consumption measurement. DOE staff said that under the proposal LED energy use must be included, but that Philips could provide comments that LEDs provide a 'utility' for the user and therefore the energy used for this purpose should not be considered as part of the energy use calculation.
- 3) Philips asked for clarification of the term "tcd." The NOPR defined it as 'charge test duration' when it is more precisely 'charge and maintenance test duration' as defined in the test procedure and TSD. The term could be interpreted as just the 'charge' portion of the 'charge and maintenance' test duration. DOE staff confirmed that this term includes both the 'charge and maintenance' test duration. E.g. if a handle was fully charged in 19 hours or less, Tcd = 24 hours.
- 4) Philips asked for clarification of the definition of "Ebatt." The NOPR references section 5.6 of the test procedure, but section 5.6 (Testing Charge Mode and Battery Maintenance Mode) does not address Ebatt. DOE staff suggested that we provide a comment to request a clarification in the rule on this issue.
- 5) Philips asked for a clarification of the equation shown in section 2.2 of test procedure. The equation is used to define 'real' power in Watts, but the equation shows VA. The equation is missing the power factor term.
- 6) Philips asked for a clarification of the duration of the charge and maintenance mode test for a battery charging system that uses trickle charging exclusively without any 'full charge' indication. DOE staff said that 24 hours should be used, regardless of the actual charge time.