MOTOROLA

DOCKET
05-AAER-1
DATE JUL 15 2005
RECD. JUL 15 2005

Wayne Anderson, Jr.
Motorola Mobile Devices
1700 Belle Meade Court
Lawrenceville, GA 30043

July 15, 2005

California Energy Commission
Docket No. 05-AAER-1
Docket Unit
1516 Ninth Street, Mail Station 4
Sacremento, CA 95814-5504

Dear Sirs;

I am the authorized representative for Motorola, Inc. in the matter of proposed amendments to the appliance efficiency regulations. This proposed action is known to the commission as docket 05-AAER-1.

In this proposal, Motorola is interested in the sections pertaining to energy efficiency for external power supplies; more specifically in section 1605.3. In subsection 1 of section 1605.3 titled "Power Supplies", it is stated that the efficiency in the active mode and in the no load mode shall be measured at both 115 volts, 60 Hz input and at 230 volts, 50Hz input. Motorola feels that this requirement places an unnecessary restriction on power supplies. With this proposed wording all new power supplies would have to be designed to meet both 115 volt and 230 volt because testing a 115 volt input power supply at 230 volts is unsafe. Further, the proposed wording would force redesign of existing 115 volt input power supplies to include both 115 volt input and 230 volt input at some amount of expense and effort. Lastly, the proposed wording does not acknowledge that California's wall outlet voltage where these products are commonly used is 115 volts, not 230 volts and therefore the inclusion of a 230 volt requirement is not applicable.

For all the reasons stated above, our comment is that section 1605.3 subsection (1) "Power Supplies" should read:

"The efficiency in the active mode measured at 115 volts at 60Hz of power supplies manufactured on or after the effective dates shall not be less than the applicable values shown (expressed as the decimal equivalent of a percentage); and the energy consumption in the no load mode measured at 115 volts at 60 Hz of power supplies manufactured on or after the effective dates shown shall be greater than the applicable values shown in table U-1 or U-2."

Your kind consideration in this regard is greatly appreciated.

Sincerely

Wayne Anderson, Jr.