HMG
Harman Music Group

DOCKET
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April 21, 2006

Jackalyne Pfannenstiel
Vice Chair
Presiding Member, Efficiency Committee
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Arthur H. Rosenfeld
Commissioner
Associate Member, Efficiency Committee
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: **Rulemaking on Appliance Efficiency Regulations (DOCKET NO. 06-AAER-1); Availability of AC / AC EPS'S**

Dear Commissioners Pfannenstiel and Rosenfeld:

Harman Music Group would like to take this opportunity to provide feedback to our findings referencing market availability of CEC efficient AC / AC type External Power Supplies (EPS's).

During the hearing of March 27, 2006, Harman Music Group maintained that there is not a readily available supply of AC / AC EPS's on the market which meet CEC requirements. It was then mentioned by the Commission that Harman Music Group should be given contact information of those manufacturers who are capable of readily supplying CEC efficient EPS's of the AC / AC type. I was provided with the contact information by Mr. Chris Calwell. Mr. Calwell provided the names and contacts of three manufacturers and that of Black and Decker. The contact of Black and Decker was given to us in hopes that they could point us in a direction of the manufacturer which they use as a source.

Of the three manufacturers, we have yet to get a response from one of them. It appears that the email address was incorrect thus a delay was created. We have since retried with a different address but have yet to hear back from them after a lapse of about a week and two additional follow up requests.

The contact at Black and Decker did respond and said that he would get back to us, but that to has yet to happen, again even after follow-up requests.

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Of the two remaining manufacturers that did give us hope Tenpao responded with the following:

> "Thank you for the enquiry, yes, we have a lot of CEC compliance family products by switching power supply design, but all of it are AC-DC models, so we can't provide the AC-AC CEC compliance products".

For your review, I will provide a complete copy of their email as an attachment.

The second manufacturer, HonKwang, responded as follows:

> "Actually, we are changing and applying part of our linear adaptors to meet California Standard. Attached is our range that we are applying. You will see that they are not match to your range. But if you are patient enough to wait about 8 weeks I think we can design our adaptors to meet your demand of your range.
>
> Our concerns are:
>
> 1.) RE: **PS0913B-120V rated 9Vac, 1.3A (wall wart) and PSS3-120V rated 9Vac, 2.1A (desk top)**
> Lead time for getting UL 1310 or UL1950 is about 4weeks . Charge is about usd 3,500 for each model.
> Lead time for CEC is about 3 weeks.No any charge needed.
> We can send you our specification and samples for your ref. first after got your confimation."

For your review I will provide a complete copy of their email as an attachment.

As you can see from the aforementioned responses we are still not able to find a readily available CEC drop-in replacement for some of the AC / AC type EPS's.

To this point, we have yet to consider that HonKwang is mentioning cost for UL certifications for UL1310, or UL1950 and not for the Audio / Video standard UL60065.

We are also looking at extremely aggressive lead times of 15 weeks from HonKwang in design and approvals. This does not take into consideration all the time for testing of the multitude of products by Harman Music Group to ensure that safety and electromagnetic interference will not be compromised and that the required Standards continue to be met.

We are also gravely concerned with the statement above from HonKwang "I think we can design our adaptors to meet your demand of your range." This indicates to us that HonKwang is not sure that they can in fact design an efficient CEC AC / AC type EPS's to meet our requirements. The current CEC adapters from HonKwang are only in the 5 watt range. EPS's used by Harman Music Group are rated 18 and 35 watts. The higher wattage ratings will prove a greater challenge to design an efficient AC / AC type of EPS's.

Additional unknowns at this time, are the cost of new material, the physical size and weight of the EPS's, production and shipping lead times along with size and shape of packaging.

Given that construction will require heavier gauge wire and the internal core to be of magnetic materials with a higher MU, we are of the opinion that the costing and size of the EPS's will be substantially higher and will not be cost effective nor fit into product packaging.

Harman Music Group will continue to work with our current supplier and HonKwang in searching out a viable solution to a CEC efficient AC / AC EPS's.

We would like to go on record as saying that the needed AC / AC type of EPS's are very likely not attainable in a cost effective manner and in such a way that it would not put an undue strain and burden on our company and to the consumer at retail level.

Having said that, we may need to come back to this Commission at a later time and ask for an exemption for those AC / AC type EPS's for which the safety approval under UL 60065 Audio / Video Safety Standard were obtained prior to the effective dates.

Sincerely,

Ernie Morales
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