CONAIR

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March 20, 2006

VIA EMAIL AND REGULAR MAIL

California Energy Commission (and Efficiency Committee)
Docket No. 06-AAER-1
1516 Ninth Street, Mail Station 4
Sacramento, California 95814-5504

Re: California Energy Commission
Notice of Proposed Action – Conair Corporation Hearing Statement
California Code of Regulations, Title 20, Sections 1601-1608
Docket No. 06-AAER-1

To Whom It May Concern:

Please accept these comments with regard to the proposed amendments to the subject appliance efficiency regulations on behalf of Conair Corporation.

With respect to the proposed delay of the effective dates of the minimum efficiency requirements for single voltage external power supplies, Conair is in favor of a delay of at least six months, or even longer, of such effective dates. Timing required for transformer redesign to meet the new efficiency requirements and subsequent production is very difficult where, as here, it is being done in conjunction with a continuing obligation to meet customer needs on current product lines. Moreover, there is a long lead-time in obtaining the necessary agency approval for the redesign (with Underwriters Laboratories and other such agencies). In addition, the average cost increase associated with making changes to our standard transformers to meet new requirements is 70-100%, or more in some instances.

Conair would also request that the Commission consider excluding certain other kinds of products from the minimum efficiency requirements, including the following types of products: small, motor-operated heated massaging appliances and therapeutic pad-type products, i.e. massagers, heating pads and non-rechargeable grooming products. These products, which are sold by Conair, are typically user-attended and short-use products that are not plugged into an outlet drawing power on an hour-to-hour, day-to-day basis.

These products are used occasionally and are often limited by the instruction booklet to 15-20 minutes of operation at one time. In fact, the regulation of these products will likely not benefit California consumers and will likely not contribute to energy savings for the state because, due to their inherently limited usage characteristics, these products are not drawing power over extended time periods.

Please advise at your earliest convenience whether the Commission will want a representative of Conair Corporation to present these comments in person at either of the upcoming hearings.

Thank you for your attention to this correspondence. Should you have any questions or comments, please feel free to contact the undersigned.

Sincerely,

CONAIR CORPORATION

Jeffrey C. Brohel
Associate Counsel

cc: Vito Carlucci
Duane Hein