KYUSHU MITSUMI CO. LTD.

1049, Tateiwa, Iizuka-Shi, Fukuoka, Japan
TEL:81-948-22-9333/FAX:81-948-21-5066

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Docket No. 06-AAER-1

Opinion document

1) About the postponement of the effective date:

We would like you to postpone the effective date until the half year for each class. Because we can not catch up with preparation for the requirement of the effective about all our products.

- Table U-1 : July 1st in 2006 → January 1st in 2007
- Table U-2 : January 1st in 2008 → July 1st in 2008 ·

2) About the exclude of the adapter for the medical equipment:

We think that it should not exclude an adapter for the medical equipment from the object. Thinking the meaning of this efficiency regulation, it doesn't accomplish a meaning , if the adapter for the medical equipment becomes an exclude. When comparing the adapter of the transformer type and the switched type :

a) Energy efficiency about the adapter of the switched type is more higher (about 20%-25%) than the transformer type.
- The transformer type adapter : About 55%
- The switched type adapter : About 75-80%

b) The no-load power consumption about the adapter of the switched type is lower than the transformer type.
- The transformer type adapter : About 7W
- The switched type adapter : About 0.7-0.1W

c) The capacity and the volume about the main unit of adapter for the switched type is 1/3 or 1/2 of the transformer type.
This means the reduction of the material (resources) for our environment.

We propose to you that it should apply this rule to "the equal to or less than 10W adapter" for global environment.

(Signature) K. Iwakuma.

Katsuyuki Iwakuma
MANAGER
SPS Department

36718