Mattel, Inc.

333 Continental Boulevard
El Segundo, California 902445-5012
Phone: 1 (310) 252-2000
Fax: 1 (310) 252-3700

April 12, 2006

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

DOCKET
06-AAER-1
DATE APR 12 2006
RECD. APR 14 2006

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

RE: **Docket No. 06-AAER-1– external power supplies provisions**

Dear Commissioners Pfannenstiel and Rosenfeld:

Mattel, Inc. is the worldwide leader in the design, manufacture and marketing of toys and family products. For more than 50 years, Mattel, Inc.'s premier toy brands have delivered innovative toys that inspire and spark children's imaginations around the world. The company's best-known brands include Barbie®, Hot Wheels®, Fisher-Price®, Tyco® R/C, and American Girl.® With headquarters in El Segundo, Mattel has approximately 5,000 employees in the U.S., including 2,500 employees in California, offices and facilities in 42 countries and sells its product in more than 150 nations throughout the world.

Since its founding in 1945, Mattel's greatest concern has always rested with the safety of the children using our products. As a result, our toys are manufactured to the strictest international standards. Mattel also has a long standing commitment to minimizing our impact on the environment, and protecting the health and safety of our employees and communities in which we operate. We therefore understand the Energy Commission's rulemaking intent and concern over energy efficiency levels.

We are writing, however, to urge you to consider making additional amendments to the proposed Appliance Efficiency Regulations affecting external power supplies. While we welcomed the current proposed amendment extending the effective date in California to January 2007, we urge you to consider extending the effective date to January 2008 to harmonize with Washington, Arizona and Massachusetts and allow our industry to ensure adequate supply availability and safety compliance. We are making a similar request in Rhode Island and Oregon.

Not unlike the fashion industry, the toy industry typically operates with long design, development and manufacture lead times. Several of our products offer a power supply option to battery operation and federal law requires any such power supplies used by children to meet additional

safety standards to prevent electric shock, overheating, and fire hazards. Our preliminary contacts with suppliers confirmed that new energy standards compliant external power supplies, if available, do not currently meet the child safety standards. A delay in implementation is critical to our ability to develop product availability with the suppliers, conduct adequate safety testing and comply with UL certification process requirements.

Additionally, we feel the California specific marking requirement would be an unnecessary burden and adding a marking that has little meaning to the consumer on an already crowded power supply would dilute the value other meaningful safety markings. Since all external power supplies are currently required by federal law to carry a visible date of manufacture stamp, those date markings would already allow to determine whether an external power supply is in compliance or not and adequately support any future state enforcement efforts.

Finally, we believe spare parts must be exempted from the regulation for single-voltage AC-to-DC power supplies. For product servicing, warranty and safety reasons, AC-to-DC power supplies made available by a product manufacturer as accessories, service parts, or spare parts for its products manufactured prior to January 1, 2008 should be exempted.

Thank you for the opportunity to comment and for your consideration.

Sincerely,

Corinne Murat
Senior Manager, Government Affairs
Mattel, Inc.