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Subject: Comment on proposed regulations (exemption recommendation)

- We agree that the Commission exempts external power supplies for medical devices from the scope of the appliance efficiency regulations.

<Reason>
- For medical devices, treatment effect and safety for patients come first. For that reasons, transformer methods are usually used for power supply of medical devices because they are excellent in long life, low electromagnetic noise, and low leakage current. Those methods, however, have difficulty to meet the regulations due to their low energy efficiency while standby.

- On the contrary, switching regulator methods usually used to reduce consumption energy are poorer in duration of life, electromagnetic noise, leakage current than the transformer methods. Switching regulators for medical devices, consequently, need more components to solve various technological issues than those of switching regulators for house appliances.

- Medical devices, specially home use medical devices are not used for long time because their users live daily life. For example, blood pressure monitors are usually used three measurements a day, 1-2 minutes per measurement. Thus, used time for external power supply for medical devices are extremely short and have very small impact to reduction of energy.

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