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Technology Policy & Regulatory Affairs

DOCKET	
11-AAER-2	
DATE	Dec. 29 2011
RECD.	Dec. 29 2011

December 29, 2011

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Docket@energy.state.ca.us

Re: Notice of Proposed Action: Proposed Amendments to Appliance Efficiency Regulations (Docket No. 11-AAER-2)

Panasonic's Home and Health Company (PHHC) appreciates the opportunity to further comment on the California Energy Commission's proposed new regulation of battery chargers (Docket Number 11-AAER-2). As a manufacturer and marketer of home and hospice care health diagnostic equipment, Panasonic urges the Commission to modify its battery charging systems proposal to also exclude FDA-designated Class I products from the scope of the regulation.

The current proposal (Page 1 Scope) reads as follows:

On Page 1, Section 1601. Scope.
(w) Battery charger systems, except those: …

(2) that are classified as Class II or Class III devices for human use under the Federal Food, Drug, and Cosmetic Act and require U.S. Food and Drug Administration listing and approval as a medical device; …

Our current product line includes home use advanced blood pressure monitors and digital hearing instruments that include power adaptors. Unlike some of the products covered under the scope of the BCS proposal, these medical devices cannot be readily redesigned to accommodate use of new types of battery chargers within the extremely tight CEC implementation schedule of the beginning of 2013.

Thus, Panasonic requests the Commission exclude FDA-designated Class I products from the regulation's scope. Your consideration of our comments is appreciated and we would be happy to further discuss with you.

Sincerely,

Mark J. Sharp
Group Manager
Corporate Environmental Department