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Via e-mail:

November 3, 2010

California Energy Commission  
Building and Appliances Office, M25  
1516 Ninth Street  
Sacramento, CA 95814-5512

Subject: Appliance Efficiency Standards for Battery Chargers Docket # 09-AAER-2  
Cobra Electronics Corporation Comments

Cobra Electronics Corp. ("Cobra") respectfully submits the following comments in response to the Appliance Efficiency Standards for Battery Chargers issued by the California Energy Commission Docket# 09-AAER-2.

**Background:**

Cobra Electronics is a marketing and sales company of consumer electronics products. Cobra is a market leader in many of the product categories in which we participate including Radar Detectors, Mobile Navigation devices for Truckers, Citizen Band Radios, GMRS Radios, and VHF Marine Radios. Many of Cobra's products, such as 2 way Radios and Mobile Navigation devices use External Power Supplies to charge their internal battery systems and would be subject to regulation being discussed.

Although Cobra imports all of the products we sell, the majority of the people who work for Cobra are US citizens and work at our corporate offices located in Chicago. Since we are a small company of only 150 people it is very difficult for us to participate in a meaningful way in these proceedings and welcome the opportunity to comment.

**Comments:**

Cobra is very disappointed that the California Energy Commission (CEC) has decided once again to regulate products which are infrequently used and, consequently, will produce very little energy savings for the people of California. Our products 2 way radios and mobile navigation devices use External Power Supplies (EPS's) to charge

batteries internal to these products. These products are charged mainly for vacation and weekend activities, not for everyday use. Although some customers may use their mobile navigation device on a daily basis, it is normally attached to the 12 Volt port in the truck or automobile, not to the EPS connected to the mains. In those infrequent circumstances when the Mobile Navigation devices is charged using the EPS, it is usually when the customer is programming the device for a complicated trip or vacation, not every day use.

The proposed regulations are further complicated by the overlap with regulations for External Power Supplies enacted by the Federal Government under EISA 2007 for energy efficiency. In fact, the Department of Energy (DOE) is now considering new regulations and has issued a technical support document which contains substantial data that is being studied by industry and other interested parties for future regulations. Cobra requests that the CEC consider participating in these proceedings rather than trying to implement an interim standard that may only be in effect for possibly only a little over a year. Alternatively if CEC is concerned about commercial products which may not be part of the DOE standard, perhaps CEC should limit their discussion to these types of products.

Cobra would also like to comment on the setting of the efficiency and no battery power limits that CEC is suggesting. Looking at the energy efficiency data on today's products it seems that only LiOn and Lead Acid Battery chargers meet the standard. This is very concerning for lower cost products which choose to use NiMh battery technology. Can NiMh chargers be made to meet this standard? I would assume the answer is yes, but it will cause most manufacturers to go back to the lab to design new charger circuitry which meets this standard and, in our case the federal EPS standard also. The confusion and potential cost is amplified by the possibility that the federal government is studying a different standard with different limits on both the EPS and Battery Charger system. It is very difficult for small companies to support all these multi developments, while at the same time work with government agencies like the CEC and DOE to develop new standards.

Cobra would also like to comment on the no load specification of 300mw for No Battery Power for Small Battery Chargers. For those companies which use EPS's as the source of DC current from the mains this could be a difficult standard to ensure 100% of the time because it is the same specification as a standard energy level V EPS. This leaves no power available for use in battery charge control when using a standard energy level 5 EPS. Consequently companies will have to request EPS's from their suppliers that are a little better than an energy level V EPS (in order to accommodate any charge control circuitry that they may have in the system). It would make much more sense for the CEC to consider a specification slightly above the 300mw level to accommodate this charge control circuitry while allowing suppliers to use standard energy level V EPS's. Although Cobra has not had the time to study this, it seems that 75 mw would allow 5 ma to be taken from a 12V EPS reliably while not really significantly effecting the energy consumption. This would change the No Battery limit from 300 mw to 375 mw.

**Conclusion:**

Cobra Electronics would like to ask the CEC to consider dropping this rulemaking for products covered under the present DOE rules for EPS's and Battery Chargers. The time and effort required by both the State of California and Industry do not justify the small amount of energy savings that will be achieved in this short period of a little more than a year. Also the CEC should consider that DOE will be issuing rules by the middle of next year which companies will begin work on immediately. The products sold in the interim will contain technologies needed to meet these standards as the industry phases over to these new standards. CEC should consider that some of the energy savings caused by DOE's new standards will be realized before the standard is in force. The same cannot be said about the present schedule the CEC has in place because it only allows one year for companies to redesign and put into production products which meet this new standard.

Respectfully Submitted,  
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By:



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