



Consumer Electronics Association

1919 South Eads Street
Arlington, VA
22202 USA
(866) 858-1555 toll free
(703) 907-7600 main
(703) 907-7601 fax
www.CE.org

MEMORANDUM

To: expartecommunications@hq.doe.gov
From: Douglas Johnson
Date: February 21, 2013
Re: Docket No. EERE- 2008-BT-STD-0005, RIN 1904-AB57
Ex parte communication
Department of Energy
Meeting of February 13, 2013

This memorandum for the record provides a summary of a February 13, 2013, meeting with U.S. Department of Energy staff concerning DOE's proposed rulemaking regarding amended energy conservation standards for Class A external power supplies (EPSs) and new energy conservation standards for non-Class A EPSs and battery chargers.

Meeting attendees:

John Cymbalsky (DOE Office of Energy Efficiency and Renewable Energy)
Jeremy Dommu (DOE Office of Energy Efficiency and Renewable Energy)
Daniel Cohen (DOE Office of General Counsel)
Michael Kito (DOE Office of General Counsel)
Douglas Johnson (Consumer Electronics Association)
Caroline Curtin (Microsoft)
Ric Erdheim (Philips Electronics)
Holly Evans (Dell)
Jim Morgan (Sony)
Mark Sharp (Panasonic)
Steve Whitaker (Bose)

The parties discussed issues raised in a letter submitted by the Consumer Electronics Association (CEA) to the DOE on February 7, 2013, a copy of which is attached. Additionally, CEA attendees presented a letter to DOE dated February 13, 2013, regarding the importance of a spare parts exemption in regulations for EPSs and battery chargers, a copy of which is attached.



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Via e-mail

February 7, 2013

Mr. John Cymbalsky
Supervisor, Appliance Standards Analysis
Office of Energy Efficiency and Renewable Energy
U.S. Department of Energy
EE-2J, Room 6172
1000 Independence Ave., S.W.
Washington, DC 20585

Subject: Current consumer electronics industry recommendation on implementation timeline for DOE regulations for battery charger systems and external power supplies

Dear Mr. Cymbalsky:

On behalf of the Consumer Electronics Association (CEA), I would like to request a Department-industry dialogue regarding the implementation timeline for the DOE's forthcoming regulations for battery charger systems and external power supplies, at least as they relate to consumer electronics.

Until recently, CEA had urged the Department to act quickly specifically on battery chargers in order to minimize the time lag between California's implementation of its regulation for battery chargers and DOE's implementation of a federal regulation, which ultimately would preempt state requirements for battery chargers. CEA urged fast implementation of the DOE rule because its limits were more suitably tailored to diverse battery charger classes, particularly for consumer electronics.

The current scenario is that California's regulation has entered into force as of February 1, 2013, and manufacturers have had to invest resources and take steps in light of this California regulatory deadline. CEA recommends that DOE consult carefully with affected parties on what, at this point, would be a reasonable lead-in or transition period prior to the effective date of a DOE energy efficiency regulation for battery chargers, given the investments in design as well as product marking that have occurred.

CEA understands that the Department's current rulemaking for battery chargers also includes proposed requirements for external power supplies. Following last year's public meeting and comment period, there are many unanswered questions and issues awaiting the Department's response and clarification for both battery chargers and external power supplies. With this

Mr. John Cymbalsky
February 7, 2013
Page 2

uncertainty, manufacturers are concerned about DOE's issuing a final rule with a yet-to-be determined effective date. There is an added level of concern if DOE were to depart from the international "Level V" standard for Class A external power supplies, which would require a more extensive transition period.

The uncertainty over the rules' effective dates precludes manufacturers from making design decisions. Once deadlines are known, companies can begin to plan for compliance. Companies must assess the scope of products impacted by the proposed requirements and how they relate to product development timelines. Companies must also communicate to stakeholders and suppliers; manage a compliance strategy or strategies; conduct testing and address any failures; and manage compliance paperwork and reporting, among other actions.

Due to these business requirements and the need for a sufficient implementation period, and in light of the investments that companies have made to meet California's requirements for battery chargers, CEA respectfully requests a Department-industry dialogue regarding a reasonable implementation timeline and appropriate deadline for the DOE's forthcoming battery charger system and external power supply regulations as they impact consumer electronics. Please let us know how best we can inform and work with the Department in this manner.

Sincerely,

A handwritten signature in black ink, appearing to read "Douglas Johnson", with a long horizontal flourish extending to the right.

Douglas Johnson
Vice President, Technology Policy

cc: Mr. Jeremy Domm, U.S. Department of Energy



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Via hand-delivery

February 13, 2013

Mr. John Cymbalsky
Supervisor, Appliance Standards Analysis
Office of Energy Efficiency and Renewable Energy
U.S. Department of Energy
Washington, DC 20585

Subject: **Importance of a spare parts exemption in regulations for external power supplies and battery chargers**

Dear Mr. Cymbalsky:

On behalf of the Consumer Electronics Association (CEA), I am submitting additional information pursuant to CEA's comments to the Department in May 2012 urging DOE to include an exemption for spare and service parts in its forthcoming regulations for battery charger systems and external power supplies, at least as they relate to consumer electronics.

In its earlier comments, CEA argued that an exemption for service parts and spare parts would be consistent with the Energy Independence and Security Act of 2007 (Public Law 110-140), which included a seven-year exemption for spare and service parts as part of the Class A EPS requirements promulgated at that time. CEA noted that seven years is still an appropriate period of time for such an exemption, given manufacturers' legal and customer service obligations to stock and supply spare parts for sale, product servicing and warranty claims for existing products using external power supplies.

With this letter, CEA provides some examples of external power supplies available for sale to consumers as spare or replacement parts. The examples include product listings from two manufacturers as well as one online retailer. We hope these examples help to illustrate the importance of DOE's including a spare parts exemption in its forthcoming regulations.

Sincerely,

Douglas Johnson
Vice President, Technology Policy

cc: Mr. Jeremy Dommu, U.S. Department of Energy

Attachments



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How to Buy HP Products

Product model number search results

Select a model number.

HP 150W External Power Supply	LK299AV, AX707AV
HP 180W External Power Supply	LK300AV
HP 230W External Power Supply	LK301AV
HP 65 Watt External Power Supply	AZ552AA, AZ552AAR
HP E630 Red and/or External Power Supply	J9443AX
HP ProCurve 610 External Power Supply	J8169AX
HP ProCurve 630 Redundant External Power Supply	J9443AZ, J9443AR, J9443A
ProCurve 600 Redundant / External Power Supply	J8168A, J8168AR

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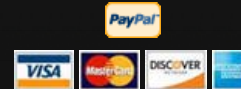
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Dell recommends Windows.

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Search Results for "AC Adapter"

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Watts

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- 101 - 200 Watts (5)
- 201 - 300 Watts (3)
- 301 - 400 Watts (1)

Shop By Price

- Less than \$15 (1)
- \$31 - \$50 (4)
- \$51 - \$80 (11)
- \$81 - \$120 (13)

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- Dell (28)
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See Results from:

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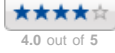



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- General Topics (2)

Community Discussions

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- Forums (11039)
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 Customer Rating  3.7 out of 5	<p>DELL</p> <p>Dell 65-Watt 3 Prong AC Adapter with 6.56 ft Power Cord for Select Dell Systems</p> <p>Usually Ships Within 24 Hours Manufacturer Part# TR82J Dell Part# 331-0536</p> <ul style="list-style-type: none"> Cables Included: Power cable - 6 ft <p style="text-align: right;">Dell Price.....\$56.00</p> <p style="text-align: right;">As low as \$20.00/month*¹</p> <p style="text-align: right;"> Apply Learn More</p> <p style="text-align: right;">More Details <input type="button" value="Add to Cart"/></p>			
 Customer Rating  4.3 out of 5	<p>DELL</p> <p>Dell 90-Watt 3 Prong Slim AC Adapter with 6.56 ft Power Cord for Select Dell Systems</p> <p>Usually Ships Within 24 Hours Manufacturer Part# C120H Dell Part# 330-4113</p> <ul style="list-style-type: none"> Cables Included: 1 x power cable - 6 ft <p style="text-align: right;">Dell Price.....\$69.99</p> <p style="text-align: right;">As low as \$20.00/month*¹</p> <p style="text-align: right;"> Apply Learn More</p> <p style="text-align: right;">More Details <input type="button" value="Add to Cart"/></p>			
 Customer Rating  4.0 out of 5	<p>DELL</p> <p>Dell 65-Watt Auto / Air AC Adapter with Power Cord for Select Dell Inspiron / Latitude / Studio / Vostro / XPS Laptops / Precision Mobile WorkStations</p> <p>Usually Ships Within 24 Hours Manufacturer Part# MK911 Dell Part# 310-8814</p> <ul style="list-style-type: none"> Cables Included: Power cable <p style="text-align: right;">Dell Price.....\$98.00</p> <p style="text-align: right;">As low as \$20.00/month*¹</p> <p style="text-align: right;"> Apply Learn More</p> <p style="text-align: right;">More Details <input type="button" value="Add to Cart"/></p>			
 Customer Rating  4.0 out of 5	<p>DELL</p> <p>Dell 130-Watt 3-Prong AC Adapter with 6.56 ft Power Cord for Select Dell Inspiron / Latitude / Studio / Vostro / XPS Laptops / Precision Mobile WorkStations</p> <p>Usually Ships Within 24 Hours Manufacturer Part# D232H Dell Part# 330-1830</p> <ul style="list-style-type: none"> Cables Included: 1 x power cable - external - 6 ft <p style="text-align: right;">Dell Price.....\$89.99</p> <p style="text-align: right;">As low as \$20.00/month*¹</p>			

	<p style="text-align: right;">Apply Learn More</p> <p style="text-align: right;">More Details Add to Cart</p>
 <p>Customer Rating ★★★★☆ 3.7 out of 5</p>	<p>DELL Dell 90-Watt AC Adapter with 6.56 ft Power Cord for Select Dell Inspiron / Latitude / Vostro / XPS Laptops</p> <p>Usually Ships Within 24 Hours Manufacturer Part# R8D4D Dell Part# 331-6301</p> <ul style="list-style-type: none"> • Cables Included: 1 x power cable - 6 ft <p style="text-align: right;">Dell Price.....\$66.00</p> <p style="text-align: right;">As low as \$20.00/month¹</p> <p style="text-align: right;">Apply Learn More</p> <p style="text-align: right;">More Details Add to Cart</p>
 <p>Customer Rating ★★★★★ 5.0 out of 5</p>	<p>DELL Dell 65 Watt 3 Prong AC Adapter with 6 ft Power Cord for Select Dell Inspiron / Latitude / Vostro / XPS Laptops</p> <p>Usually Ships Within 24 Hours Manufacturer Part# 0V0KR Dell Part# 331-5968</p> <ul style="list-style-type: none"> • Cables Included: 1 x power cable - 6 ft <p style="text-align: right;">Dell Price.....\$56.00</p> <p style="text-align: right;">As low as \$20.00/month¹</p> <p style="text-align: right;">Apply Learn More</p> <p style="text-align: right;">More Details Add to Cart</p>
 <p>Customer Rating ★★★★☆ 3.0 out of 5</p>	<p>DELL Dell 30-Watt 3-Prong AC Adapter for Select Dell Inspiron / Vostro Laptops</p> <p>Usually Ships Within 24 Hours Manufacturer Part# 313JX Dell Part# 330-9808</p> <p style="text-align: right;">Dell Price.....\$42.99</p> <p style="text-align: right;">As low as \$20.00/month¹</p> <p style="text-align: right;">Apply Learn More</p> <p style="text-align: right;">More Details Add to Cart</p>
 <p>Customer Rating ★★★★★ 5.0 out of 5</p>	<p>DELL Dell 45 Watt 3-Prong AC Adapter for Dell XPS 12/ 13/ 13 MLK Laptops</p> <p>Usually Ships Within 24 Hours Manufacturer Part# JHJX0 Dell Part# 312-1307</p> <ul style="list-style-type: none"> • Cables Included: 1 x power cable - external <p style="text-align: right;">Dell Price.....\$49.99</p> <p style="text-align: right;">As low as \$20.00/month¹</p> <p style="text-align: right;">Apply Learn More</p> <p style="text-align: right;">More Details Add to Cart</p>
 <p>Customer Rating ★★★★★ 5.0 out of 5</p>	<p>DELL Dell 65 Watt 2 Prong AC Adapter with 6.56 ft Power Cord for Dell Vostro A840 Laptop</p> <p>Usually Ships Within 24 Hours Manufacturer Part# UM660 Dell Part# 330-5711</p> <ul style="list-style-type: none"> • Cables Included: 1 x power cable - 7 ft <p style="text-align: right;">Dell Price.....\$56.00</p> <p style="text-align: right;">As low as \$20.00/month¹</p> <p style="text-align: right;">Apply Learn More</p> <p style="text-align: right;">More Details Add to Cart</p>
 <p>Customer Rating ★★★★☆</p>	<p>DELL Dell 60-Watt 3-Prong AC Adapter with 3.28 ft Power Cord for Select Dell Inspiron / Latitude Laptops</p> <p>Usually Ships Within 24 Hours Manufacturer Part# CF719 Dell Part# 312-0367</p> <ul style="list-style-type: none"> • Cables Included: 1 x power cable - integrated <p style="text-align: right;">Dell Price.....\$56.00</p> <p style="text-align: right;">As low as \$20.00/month¹</p> <p style="text-align: right;">Apply Learn More</p>

3.0 out of 5

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DELL

Dell 90 Watt 3-Prong AC Adapter with 6-ft Power Cord for Dell Precision M50 Mobile WorkStation

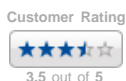
Usually Ships Within 24 Hours
Manufacturer Part# 3K360
Dell Part# 310-1093

Dell Price.....**\$66.00**

As low as **\$20.00/month***¹
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• Cables Included:

- 1 x power cable - external
- 1 x power cable - integrated



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DELL

Dell 30-Watt 3 Prong AC Adapter with 3.28 ft Power Cord for Dell Latitude 10 ST2 / ST2e / XPS 10 Tablet

Usually Ships Within 24 Hours
Quantity: 1
Manufacturer Part# 8PRY3
Dell Part# 332-0245

Dell Price.....**\$49.99**

As low as **\$20.00/month***¹
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• Cables Included: 1 x power cable - 3.3 ft

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- Camera & Photo (1)

International Shipping

What's this?

AmazonGlobal Eligible

Shipping Option

Free Super Saver Shipping

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- Cubeternet.com (1)
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- OKGEAR (2)
- Western Digital (10)
- Seagate (8)
- Sunvalleytek (1)
- Hosa (1)
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Avg. Customer Review

- ★★★★★ & Up (71)
- ★★★★☆ & Up (97)
- ★★★☆☆ & Up (103)
- ★★☆☆☆ & Up (109)

Condition

- New (166)
- Used (37)
- Refurbished (9)

Price

- Under \$25 (163)
 - \$25 to \$50 (8)
 - \$50 to \$100 (1)
- \$ to \$



Seller

- BetterStuff LowerPrice (21)
- Best Price Power Adapter (17)
- GPK Systems (13)
- Osprey-Talon (13)
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Premium External Power Supply 5.0v 2.0A (2000mA) AC/DC Adapter for USB HUB and 2.5-inch HDD Enclosure

\$3.99

In Stock

More Buying Choices \$3.99 new (4 offers)

★★★★☆ (90)

Product Description

... IEEE 1394 external enclosure ... required 5V DC power and physically ...



Hosa Cable ACD477 Universal AC Power Supply

~~\$25.35~~ \$14.21

Order in the next 9 hours and get it by Thursday, Feb 14. Eligible for FREE Super Saver Shipping.

More Buying Choices \$9.47 new (33 offers) \$9.95 used (4 offers)

★★★★☆ (99)

Product Description

... Hosa ACD477 is a universal power supply for all your pedals, effects ...



Coolerguys 100-240v AC to 12 & 5v DC 4pin Molex 2A Power Adapter

~~\$20.00~~ \$14.95

Order in the next 9 hours and get it by Thursday, Feb 14. Eligible for FREE Super Saver Shipping.

★★★★★ (39)

Product Description

... you buy direct Great Adapter to Power your Entertainment Center ...



Yamaha PA150MM Keyboard AC Power Adapter

~~\$39.95~~ \$18.33

Order in the next 9 hours and get it by Thursday, Feb 14. Eligible for FREE Super Saver Shipping.

More Buying Choices \$17.99 new (17 offers) \$18.15 used (2 offers)

★★★★★ (23)

Product Description

... replaces the PA5D and reduces the power when the musical instrument is ...



Playstation 2 PS2 Slim Ac Power Adapter 7000 9000 Series

\$8.28

Order in the next 9 hours and get it by Thursday, Feb 14. Eligible for FREE Super Saver Shipping.

More Buying Choices \$0.77 new (9 offers) \$6.00 used (11 offers)

★★★★☆ (30)

ESRB Rating: Rating Pending

Product Description

AC power Adapter for the slim Playstation 2 series made by Classic Game Source



12V DC Power Adapter Supply 2.1mm 1A, CCTV

\$5.56

In Stock

More Buying Choices \$0.97 new (13 offers) \$0.20 used (3 offers)

★★★★☆ (32)

Product Description

... 12VDC 1000mA (1A) Regulated Power Supply for CCTV Cameras SPECIFICATION ...



[Power Supply \(for All Magnus, 100-200V\) for Units with External Power Supply](#)

\$92.51
+ \$10.95 Est. Shipping
[TotalBarcode](#)



[Digium Analog FXS Module Power Supply \(PWR2402B\)](#)

\$100.00
+ No Shipping Info
[Telephonyware](#)



[Serial ATA to USB 2.0 Cable Converter](#)

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[VideoSecu 12V DC 500mA Regulated CCTV Camera Power Supply UL Listed Switching 100V-240V AC to DC 2.1mm x 5.5mm...](#)

\$9.99
Order in the next **9 hours** and get it by Thursday, Feb 14.
Eligible for FREE Super Saver Shipping.

More Buying Choices
\$0.01 new (11 offers)
★★★★★ (34)

Product Description
... switch mode regulated *power supply*. It is center positive and ...



[9V DC Power Adapter Supply 1A](#)

\$5.79
Order in the next **5 hours** and get it by Thursday, Feb 14.
Eligible for FREE Super Saver Shipping.

More Buying Choices
\$0.19 new (6 offers)
\$2.00 used (1 offer)

★★★★☆ (30)
Product Features
9VDC 1000mA (1A) Regulated *Power Supply*



[Logisys PSAD24 24-Watt 12V 2A AC Power Adapter](#)

\$7.65
Order in the next **8 hours** and get it by Thursday, Feb 14.
Eligible for FREE Super Saver Shipping.

More Buying Choices
\$2.18 new (6 offers)
★★★★☆ (29)

Product Description
... *Power it up!* Convert that AC current to DC for your electronics with ...



[Replacement LCD Monitor Ac Adapter 12v 5a Power Supply with Cord](#)

\$12.95
Order in the next **9 hours** and get it by Thursday, Feb 14.
Eligible for FREE Super Saver Shipping.

More Buying Choices
\$4.15 new (9 offers)
★★★★★ (41)

Product Features
LCD Monitor Ac Adapter 12v 5a *Power Supply* with Power Cord



[Seagate WA-18G12U AC power adapter -12V 1.5A ~120-240v US](#)

~~\$29.99~~ **\$9.99**
Only 10 left in stock - order soon.

More Buying Choices
\$4.50 new (11 offers)
★★★★☆ (20)

Product Description
WA-18G12U SEAGATE *POWER SUPPLY* FOR EXTERNAL DRIVE 12V 1.5A



[Sony AC-E45A Worldwide AC Power Adaptor with Folding Plug Blade](#)

~~\$19.99~~ **\$14.99**
Order in the next **9 hours** and get it by Thursday, Feb 14.
Eligible for FREE Super Saver Shipping.

More Buying Choices
\$12.92 new (8 offers)
★★★★☆ (67)

Product Description
... adapter / Transforms 100-220V AC *power* to steady 4.5V DC power / Rated ...



[AC Power Adapter 120V, 240V / 12V-1A / 5.5mm-2.1mm](#)

\$6.48
Order in the next **4 hours** and get it by Thursday, Feb 14.
Eligible for FREE Super Saver Shipping.

More Buying Choices
\$3.49 new (10 offers)
\$3.49 used (1 offer)
★★★★☆ (16)



[AC Power Supply Adapter with Power Cord For Dell 2001FP 2100FP R0423 0R0423 ADP-90FB B PA-9 \(4-pin Din\) LSE0202C2090...](#)

\$10.11
Order in the next **9 hours** and get it by Thursday, Feb 14.
Eligible for FREE Super Saver Shipping.

More Buying Choices
\$5.12 new (7 offers)
\$14.97 used (2 offers)



[Switching Power Adapter Fits Dell AX510 / AX510PA / AS501 / AS501PA Sound Bar Speakers LCD Flat Panel Speaker ...](#)

\$11.78
Order in the next **8 hours** and get it by Thursday, Feb 14.
Eligible for FREE Super Saver Shipping.

More Buying Choices
\$7.38 new (6 offers)
\$6.07 used (2 offers)

Product Description

... UL approved Switching *Power supply*. Input Voltage: 120V, 240V Input ...

★★★★★ (20)

Product Features

Power Supply Adapter with Power Cord

★★★★★ (17)

Product Description

... Switching *Power Adapter Fits Dell AX510 / AX510PA / AS501 / AS501PA ...*



AC Adapter Power Cord for Western Digital External Hard Drives

\$16.88

In Stock

More Buying Choices

\$16.88 new (4 offers)

★★★★★ (5)

Product Description

... AC Adapter *Power Cord* for Western Digital External Hard Drives My Book ...



New 12V AC Power Adapter For Maxtor OneTouch II III HDD,3100 Personal Storage

\$8.97

Order in the next **6 hours** and get it by Thursday, Feb 14.

Eligible for FREE Super Saver Shipping.

More Buying Choices

\$2.99 new (5 offers)

★★★★★ (20)

Product Description

... worldwide use) Output: DC12V 3A *Power*: 36W DC Size: Inner diameter - 2. ...



AC Power Adapter Charger for Sony DVP Portable DVD Players

\$12.48

In Stock

★★★★★ (20)

Product Features

Use this ac charger adapter to charge or *power* you Portable dvd player



Power Supply AC ADAPTER 5V 2.5A for D-Link

\$12.46

Order in the next **8 hours** and get it by Thursday, Feb 14.

Eligible for FREE Super Saver Shipping.

More Buying Choices

\$7.48 new (8 offers)

\$4.40 used (7 offers)

★★★★★ (29)

Product Description

... 1 Year - Includes Adapter and *Power Cord* Cable(fit for your country ...



Pwr+ Ac Power Supply Adapter for Yamaha Psr-100 Psr-111 Psr-110 Psr-12 Psr-125 Psr-130 Psr-140 Psr-15 Psr-150 ...

~~\$39.99~~ **\$19.90**

Order in the next **9 hours** and get it by Thursday, Feb 14.

Eligible for FREE Super Saver Shipping.

More Buying Choices

\$14.90 new (2 offers)

★★★★★ (13)

Product Description

... We focus on providing quality *power* products and excellent customer ...



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Product Description

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APD WA-24E12 12V 2A AC Adapter Power Supply for Seagate FreeAgent FW External Hard Drive - White - Also works ...

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Product Description

... AC Adapter *Power Supply* for Seagate FreeAgent FW *External Hard Drive* ...

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\$1.99 new (6 offers)

★★★★★ (26)

Product Features

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Product Description

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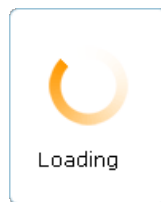
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