

**ITI**

Promoting Innovation Worldwide

March 29, 2024

MEMORANDUM OF EX PARTE COMMUNICATION

Dockets: Energy Conservation Standards for Battery Chargers, Doc. No. EERE-2020-BT-STD-0013 / RIN 1904-AE50, 88 Fed. Reg. 16112 (March 15, 2023) (Notice of Proposed Rulemaking); Energy Conservation Standard for External Power Supplies, Doc. No. EERE-2020-STD-0006 / RIN 1904-AD87, 88 Fed. Reg. 7284 (Feb. 2, 2023) (Notice of Proposed Rulemaking); Certification Requirements, Labeling Requirements, and Enforcement Provisions for Certain Consumer Products and Commercial Equipment, EERE-2023-BT-CE-0001 / RIN 1904-AF48, 88 Fed. Reg. 67458 (Sept. 29, 2023) (Notice of Proposed Rulemaking).

Meeting Date: March 22, 2024

Attendees: Rawan Chaker (ITI); Pierre Harfouche (Apple, Inc.); Scott Jackson (Apple, Inc.); Adrian Liga Gondawijaya (Apple, Inc.); Andrew Lirio (Canon U.S.A., Inc.); Ian Robert Hnizdo (Canon U.S.A., Inc.); Eryn Nelson (Dell, Inc.); Kevin Farnam (Garmin); Dave Cassano (Google); Jonny Rodriguez (HP); Mary Sampson (Motorola Solutions, Inc.); Jim Spitaels (Schneider Electric); John Hodges (HWG LLP); Sean Lev (HWG LLP); Jeremy Domm (DOE); Lucas Adin (DOE); Melanie Lampton (DOE); Uchechukwu (Emeka) Eze (DOE).

Meeting Summary: ITI indicated that had requested this meeting to engage in a meaningful dialogue with the Department of Energy. It wanted to share its further views and provide additional information that DOE may need. ITI's goal was to present the issues at hand and to provide comprehensive insights into its perspective and recommendations. Its agenda for the meeting was focused on three critical rulemaking files that are of significant importance to ITI and the industry it represents:

- Energy Conservation Standard for External Power Supplies.
- Energy Conservation Standards for Battery Chargers.
- Certification and Labelling Requirements.

Global Headquarters
700 K Street NW, Suite 600
Washington, D.C. 20001, USA
+1 202-737-8888

Europe Office
Rue de la Loi 227
Brussels - 1040, Belgium
+32 (0)2-321-10-90

info@itic.org
www.itic.org
@iti_techtweets

ITI made a presentation summarized in the attached slides (Attachment I). The presentation covered the following topics:

- External Power Supplies – Definitions.
- Single-Voltage Adaptive Power Supplies – Engineering Analysis.
- Adaptive Multiple-Voltage Power Supplies – Low Voltage Test Point.
- Adaptive Multiple-Voltage Power Supplies – No-Load Test Point.
- Adaptive Multiple-Voltage Power Supplies – Stale and Deficient Data.
- Adaptive Multiple-Voltage Power Supplies – Practical Effect on US-PD supplies.
- External Power Supplies – Effect of Cable Losses.
- Battery Chargers – Data Availability & Omitted Considerations.

ITI also indicated that the slides do not cover all items of concern (including certification and labeling requirements) and that a longer document to be provided with the memorandum of the meeting would cover all the points in detail (Attachment II).

We request that this memorandum and its attachments be included in the record of these proceedings and that DOE fully consider and address the arguments in all these documents in any determinations it makes.

Submitted By:



Rawan Chaker

Senior Manager of Policy for Sustainability

rchaker@itic.org