April 25, 2012

U.S. Department of Energy
Building Technologies Program
Mailstop EE-2J
1000 Independence Avenue, SW
Washington, DC 20585-0121

Subject: Comments Regarding the Notice of Proposed Rulemaking (NOPR) for Energy Conservation Standards for Battery Chargers and External Power Supplies, Docket Number EERE–2008–BT–STD–0005, RIN 1904–AB57

Thank you for the opportunity to comment on the U.S. Department of Energy (DOE) Notice of Proposed Rulemaking (NOPR) for Energy Conservation Standards for Battery Chargers and External Power Supplies. We would like to thank the DOE and their staff for their interest in and concern for our stakeholder feedback. We respectfully submit the following requests regarding the NOPR.

Request 1: Classify golf car battery charger systems as non-consumer products.

On page 80 of the NOPR, the DOE references the following document which they previously issued to address the distinction between consumer and non-consumer products:

http://www1.eere.energy.gov/buildings/appliance_standards/pdfs/cce_faq.pdf

In this document, the DOE explains how they determine if a product is "of a type" that makes it a consumer product. One of the factors is the distribution of shipments of the product type and the basic model. We continue to believe that since approximately 89.4 percent, by the DOE's research, and over 90 percent, by our research, of new golf car battery charger systems are sold to commercial or industrial businesses, primarily golf courses, that they are primarily and principally distributed to non-consumers.

Another factor in this document is whether the model has distinguishing design features or characteristics from models of the same product type that are sold for personal use or consumption. Golf car battery charger systems are designed electrically and mechanically to be rugged and durable enough to withstand the demands and abuse of commercial and industrial applications. In fact, they are much closer in design and construction to battery charger models for use with industrial/utility vehicles, aerial work platforms (e.g., scissor lifts and boom lifts), material handling equipment (e.g., lift trucks), and floor machines, which are all commercial or industrial applications, than battery charger models sold primarily and principally for personal use or consumption.

If the DOE continues to believe that golf car battery charger systems are a type of consumer product, then we would request that the products that are sold to commercial or industrial businesses, as long as they are differentiated from the products that are sold to individuals, be classified separately as non-consumer products.

Request 2: Adopt a compliance date for battery chargers of at least 2 years from the announcement of the final rule.

The testing process that a golf car manufacturer, a battery charger manufacturer, and battery manufacturers undertake to qualify a new golf car battery charger system is extensive. After the design

work is complete, which itself is a lengthy and involved process, all parties perform a number of rounds of lab testing. After the design iterations that result from the lab testing, a field test is performed where numerous fleets of golf cars are deployed to golf courses with the new battery charger system for a full season of use (6+ months). Only after a successful field test is complete can the golf car manufacturer begin transitioning the vehicle manufacturing process to include the new battery charger system and the battery charger manufacture submit the products for safety agency approvals, such as UL. This process often takes over 2 years and, because of the resources, time, and risk involved, is not a process that is undertaken often – the typical design life of a golf car battery charger system is expected to be at least 10 to 15 years.

For these reasons, a compliance date for golf car battery charger systems of less than 2 years from the announcement of the final rule would be nearly impossible to meet. Again, we disagree with the classification of golf car battery charger systems as consumer products, but the compliance date must be at least 2 years from the announcement of the final rule in order for compliance to be achieved in a reasonable manner.

Again, thank you for the opportunity to comment on the DOE NOPR for Energy Conservation Standards for Battery Chargers and External Power Supplies. Please let us know if you have any questions regarding our comments or if we can be of any further assistance.

Best Regards,

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