UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

In the Matter of **CERTAIN VERTICAL POWER DELIVERY SYSTEMS, COMPONENTS THEREOF, AND COMPUTING SYSTEMS CONTAINING THE SAME**	**ITC Docket No. 337-3936**

PROPOSED RESPONDENTS MONOLITHIC POWER SYSTEMS, INC., CHENGDU MONOLITHIC POWER SYSTEMS CO., LTD. AND MPS INTERNATIONAL (SHANGHAI) LTD.'S[1] REQUEST TO MODIFY COMPLAINANT VICOR CORPORATION'S[2] PROPOSED "PLAIN LANGUAGE" STATEMENT AND SCOPE OF THE INVESTIGATION

[1] These proposed respondents are collectively referred to as "MPS."

[2] Vicor Corporation is referred to as "Vicor."

Pursuant to 19 C.F.R. § 210.8(c)(2), MPS respectfully requests to modify Vicor's proposed "plain language description of the accused products." Vicor proposes that the scope of the Investigation, if instituted, should be "vertical power delivery systems and components thereof, used in data center server, artificial intelligence and cloud computing systems, to power artificial intelligence ('AI') accelerators, tensor processing units ('TPU'), graphical processing units ('GPU') and central processing units ('CPU'), and computing systems containing the same." Complaint, ¶ 51. Vicor's statement does not comply with Commission Rule 210.12(a)(12), and is too overbroad and ambiguous to plainly define the scope of a Section 337 Investigation. If the Commission decides to institute an Investigation, it should instead adopt MPS's proposed scope:

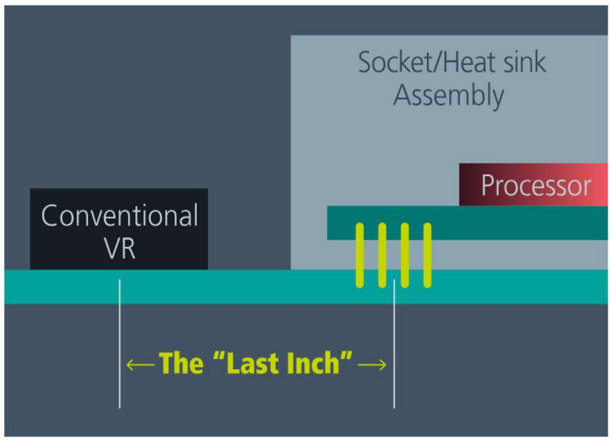
> vertical power delivery systems comprising a power conversion module dedicated to vertical power delivery through an interconnection module or interconnection layer assembled in a stacked configuration with a load, and components thereof specifically designed for use in such an architecture and not designed for use in lateral power delivery systems, for delivering power to semiconductor devices such as artificial intelligence ('AI') accelerators, tensor processing units ('TPU'), graphical processing units ('GPU') and central processing units ('CPU'), and computing systems containing the same.

MPS's proposal only changes "vertical power delivery systems and components thereof" to provide more specificity, while maintaining the remainder of Vicor's proposal.

Commission Rule 210.12(a)(12) requires that "the complaint shall … [c]ontain a clear statement in plain English of the category of products accused. ***For example, the caption of the investigation might refer to 'certain electronic devices,' but the complaint would provide a further statement to identify the type of products involved in plain English such as mobile devices, tablets, or computers***." 19 C.F.R. § 210.12(a)(12) (emphasis added). But, contrary to this rule, Vicor's purported "plain language" statement nearly mirrors its proposed caption, merely adding a little detail as to specific use cases for "vertical power delivery systems and components thereof." In fact, "vertical power delivery" describes a series of ***techniques*** for distributing

electrical power where power moves vertically from a converter to the load. Thus, "vertical power delivery systems"—the alleged category of accused products for MPS and other component suppliers—is not a category of products at all. Even to the extent the Commission considers "computing systems" to define a category of accused products, Vicor still has not identified any category of accused products that makes up "vertical power delivery systems and components thereof." This failure to comply with Rule 210.12(a)(12) prejudices Respondents like MPS, who do not import or sell "computing systems," but instead supply components such as power converters. Without a clear identification of the MPS accused products subject to the requested Investigation, dozens of products with no rational relation to Vicor's asserted patent could be swept into the scope of discovery and the potential remedy.

Vicor itself confirms that vertical power delivery ("VPD") is only relevant for "the last inch" of the power distribution network ("PDN") before the processor. As seen in the Vicor figure to the left, that "last inch" is output from a voltage regulator ("VR" in the figure) and input to a processor (generically referred to as a "load"). And, "[d]epending on processor current, engineers can choose between lateral or vertical power delivery (LPD and VPD)."[3]



Vicor and MPS both describe LPD and VPD similarly—there is no dispute that they are distinct techniques. For example, below is an MPS figure that contrasts LPD with VPD (which MPS calls "Z-Axis Power Delivery" or "ZPD") that is attached to Vicor's Complaint:

[3] https://www.vicorpower.com/resource-library/white-papers/boosting-performance-in-48v-power-distribution (noting that VPD further eliminates power distribution losses).



Complaint, Ex. 34 at 24 (annotated). The top part of this MPS figure depicts LPD within the red box. Power moves ***laterally*** from the power module (including a driver MOS (small black box labeled "DrMOS") and an inductor (large black box labeled "L")) through the printed circuit board (large green box labeled "PCB") into the processor—the application specific integrated circuits (gray box labeled "ASICs"). This top part of the MPS figure is similar to the Vicor figure above, showing LPD. In contrast, the bottom part of the MPS figure depicts ZPD within the purple box. Power moves ***vertically*** from the power modules (small black boxes at the bottom of the figure) through the PCB toward the ASICs. Vicor similarly describes VPD as "mov[ing] the current multiplier directly beneath the processor … ."[4] The MPS figure also specifies that LPD is best for "< 1000 A" and VPD for "> 1000 A," which corresponds to Vicor's aforementioned point that the choice of LPD versus VPD is influenced by processor current and is up to the system designer.

This distinction between LPD and VPD renders Vicor's proposed scope of the Investigation overbroad. In particular, MPS sells dozens of power modules with various features and sizes.[5] And because LPD versus VPD is a design choice as to whether to position the power

[4] https://www.vicorpower.com/resource-library/white-papers/boosting-performance-in-48v-power-distribution.

[5] https://www.monolithicpower.com/en/products/power-modules.html?srsltid=AU7gw4UeL4eZd_05zIlkqCQ4_qpZKF3lX963vyYYSoXkCv8Hz1tSbg0O.

module laterally to the side of the processor or vertically underneath it, many of these MPS power modules could ***theoretically*** be used in ZPD, and could thus be interpreted to comprise "vertical power delivery systems and components thereof" under Vicor's proposed scope, ***even though no rational designer would use or has used them in ZPD***. This, in turn, would cause significant overbreadth and unnecessary burden on MPS and the other, similarly situated component supplier proposed respondents—both in discovery and the scope of potential exclusion. That is because while the vast majority of MPS's relevant power modules are designed and intended for use in ***LPD, not ZPD***, those modules are arguably within the scope of Vicor's proposed Investigation.

MPS's products that are suitable for ZPD are easily identified, and if instituted, the Investigation as it pertains to MPS should be limited to those products. For example, MPS specifies which products are suitable for ZPD by explicitly stating that they are "suitable for … Z-Axis Power Delivery" or similar, and specifying that they are just a few millimeters tall, as in the example below from the MPS product literature attached to Vicor's Complaint:

MPC22166-130 – Two-Phase Intelli-Module with Quiet Switcher™ Technology

The MPC22166 is a non-isolated, step-down power module with 130A of continuous peak output current. This module integrates driver MOSFETs and an inductor in a compact package to save layout space and achieve a higher power density. It is scalable for many modules in parallel, up to 2kW+ of power. The 4mm maximum height makes it suitable for many applications, such as Z-Axis Power Delivery™ and PCIe form factor boards.

Features:

- Input Voltage Range: 4V to 16V
- Output Voltage Range: 0.5V to 2V
- 130A Output Current
- Top-Side Cooling Package
- Current Sense: Accu-Sense™
- Temperature Sense
- Current Limit Protection
- Supports Parallel Operation
- Over-Temperature Protection (OTP)
- Fault Reporting
- Common Footprint LGA-72 (9mmx10mm) Package
- Extremely Low Height: Maximum 4mm
- Pin-to-Pin Compatible with the MPC22163

Dimensions:
9mmx9.9mmx3.9mm

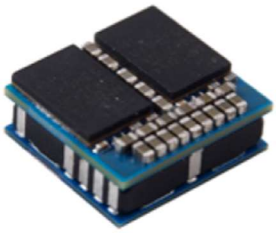


Figure 9: MP22166-130

Complaint, Ex. 34 at 31 (annotated); *see also id.* at 13 (noting ZPD module height is limited by

5mm height of "mezzanine connector"), 24 ("MPS offers power module solutions with <4mm height to fit in the limited space on the bottom side of the PCB"). The scope of the Investigation should be limited to products ***designed and intended*** for potential use, or ***actually used***, in Z-axis power delivery, and should exclude products ***designed and intended*** for use in lateral power delivery. That way, discovery and the remedy will not sweep in MPS's many LPD-only products.

Moreover, Vicor's asserted patent does not even purport to relate to ***all*** "vertical power delivery systems and components thereof." Instead, Vicor's patent describes an arrangement wherein a power conversion module and a dedicated "interconnection module" are stacked to form what the patent calls "a module-sandwich." Complaint, Ex. 1. So, again, adopting Vicor's generic scope that captures all "vertical power delivery systems and components thereof" would create extreme overbreadth in this regard as well. Specifically, it would sweep in all products for VPD methods ***other than*** the one Vicor patented. Thus, the scope of the Investigation should be limited to products that arguably implement the VPD arrangement in Vicor's asserted patent.

For all of these reasons, if the Commission decides to institute an Investigation, it should adopt a more particular and appropriate scope for that Investigation, which would provide appropriate certainty and notice to affected parties including the proposed respondents. MPS proposes that such a scope would be "vertical power delivery systems comprising a power conversion module dedicated to vertical power delivery through an interconnection module or interconnection layer assembled in a stacked configuration with a load, and components thereof specifically designed for use in such an architecture and not designed for use in lateral power delivery systems, for delivering power to semiconductor devices such as artificial intelligence ('AI') accelerators, tensor processing units ('TPU'), graphical processing units ('GPU') and central processing units ('CPU'), and computing systems containing the same."

Dated: September 22, 2026

Respectfully Submitted,

/s/ David J. Shaw

Matthew Moore
David J. Shaw
Amit Makker
Ashley Finger
Drew Roberts
LATHAM & WATKINS LLP
555 11th St. NW, Suite 1000
Washington, D.C. 20004-1304
T: (202) 637-2200
MPSVICORVERTICALITC.LWTEAM@lw.com

Counsel for Respondents Monolithic Power Systems, Inc., Chengdu Monolithic Power Systems Co., Ltd., and MPS International (Shanghai) Ltd.

CERTIFICATE OF SERVICE

It is hereby certified that copies of the foregoing **PROPOSED RESPONDENTS MONOLITHIC POWER SYSTEMS, INC., CHENGDU MONOLITHIC POWER SYSTEMS CO., LTD. AND MPS INTERNATIONAL(SHANGHAI) LTD.'S1 REQUEST TO MODIFY COMPLAINANT VICOR CORPORATION'S2 PROPOSED "PLAIN LANGUAGE" STATEMENT AND SCOPE OF THE INVESTIGATION** were served on September 22, 2026 as follows:

The Honorable Lisa R. Barton Secretary to the Commission U.S. International Trade Commission 500 E Street, SW, Room 112 Washington, DC 20436	By EDIS
Louis S. Mastriani BUCHANAN INGERSOLL & ROONEY PC, 1700 K Street N.W., Suite 300 Washington, D.C. 20006-380 Oleg Elkhunovich SUSMAN GODFREY LLP 1900 Avenue of the Stars, Suite 1400 Los Angeles, California 90067-6029 *Counsel for Complainant Vicor Corporation*	By Email: VICORII-ITC@bipc.com vicorvpd-itc@susmangodfrey.com

/s/ Nina Armah
Nina Armah
Senior Paralegal
LATHAM & WATKINS LLP