



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

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Mr. Edward Minasian
Secretary for STP 1699
Underwriters Laboratories Inc.
1285 Walt Whitman Road
Melville, NY 11747-3081

Re: Ballot for ANSI Recognition of the First Edition of the Standard for Safety for Arc-Fault
Circuit-Interrupters, UL 1699

Dear Mr. Minasian:

This letter provides comments from the U. S. Consumer Product Safety Commission (CPSC) staff regarding the subject ballot. Although the Commission staff participant is a non-voting member of the Underwriters Laboratories (UL) voluntary standards process, we submit these comments in accordance with the UL Standards Technical Panel (STP) ballot instructions.

The CPSC technical staff believes that major upgrades to the standard are needed before it is recognized as an American National Standards Institute (ANSI) standard. Typical Arc-Fault Circuit-Interrupters (AFCIs) incorporate Ground-Fault Circuit-Interrupter (GFCI) technology with additional sensing electronics for arc detection. AFCIs may be installed in similar environments as GFCIs and field studies have indicated that over 10% of GFCIs in the field are not providing the required shock protection. Accordingly, the CPSC staff believes that the new requirements that were added to the safety standard for GFCIs to address "critical safety issues" should also be incorporated in the safety standard for AFCIs. These needed upgrades include the requirements to address resistance to electrical surges, resistance to effects of wet locations, and miswiring of receptacle-type devices. Additionally, provisions to require that AFCIs cannot be reset if the AFCI is not operable should be included. This point is further explained in the attached position paper on GFCIs from the Engineering Staff of the CPSC dated April 20, 2001.

Mr. Edward Minasian

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Thank you for the opportunity to provide these comments to the STP. The views expressed in this letter do not necessarily reflect the official position of the Commission since the matter has not been reviewed or considered by the Commissioners.

Sincerely,

Douglas A. Lee