



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

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Mr. Joe Musso
STP Chair – UL Subject 507
Underwriters Laboratories Inc.
333 Pfingsten Road
Northbrook, IL 60062

Re: Proposals for the 9th Edition of UL 507, *Standard for Electric Fans*, Bulletin dated June 3, 2005

Dear Mr. Musso:

This letter presents comments from the U.S. Consumer Product Safety Commission (CPSC) staff regarding proposed changes to the 9th edition of UL 507, *Standard for Electric Fans*. * Item 3 of the bulletin proposes new requirements for Low Pressure Inflators. The CPSC staff believes that these requirements need to be updated to include requirements for continuous use inflatable products.

During the past few years, the CPSC staff has become aware of many new home-use inflatable children's toys on the market. We have worked with UL staff to define the minimum level of safety requirements that should be considered for home-use inflatables and the associated electric fan. In a January 2004 letter to manufacturers and importers of consumer or home-use inflatable children's toys, the CPSC Compliance staff published some of this information as enforcement guidelines. A copy of the letter is attached and is available on the CPSC website at: <http://www.cpsc.gov/LIBRARY/FOIA/FOIA04/os/mfginflatable.pdf>. Many of the products we have seen do not meet appropriate safety requirements for the particular application or use.

The CPSC Compliance staff determined that home-use inflatable children's toys that contain electric motors powered by electric current from nominal 120-volt branch circuits meet the definition of an electrically operated children's product at 16 C.F.R. § 1501.1(a)(1). Therefore these products are subject to the requirements set forth in the regulation for

* These comments are those of the CPSC staff, have not been reviewed or approved by, and may not necessarily represent the views of, the Commission.

Electrically Operated Toys or Other Electrically Operated Articles Intended for Use by Children, 16 C.F.R. Part 1505. In the January 2004 letter, the Compliance staff recognized that these products may be used outdoors in wet locations and provided guidance under which it would not enforce two of the requirements in the regulation. The two requirements concern a limit for amperage of the electric motor and the limits for cord length (see enclosed letter).

Because of the outdoor use and the likelihood that children may be barefoot while playing in and around the products, the CPSC staff believes that it is essential that the electric fans certified for use for this application have listed ground-fault circuit-interrupters (GFCIs) protecting the power cord and electric fan. This will help protect consumers from electric shock in the event of fan tip-over or faults with the power cord or fan.

In addition to the GFCI protected power cord and meeting the provisions set out in 16 C.F.R. Part 1505 with the two exceptions noted above, the CPSC staff believes that additional product warnings and labeling should be added. These include, at a minimum, warnings about anchoring inflatables – including the fan – and the hazards associated with using extension cords with the fan. Anchoring is needed because sudden gusts of wind may lift the inflatables and the fan off the ground if there is no anchoring. To allow for direct plug-in to receptacles, the CPSC staff proposes that a 25 foot-long minimum requirement be added for power cords on this product.

Thank you for this opportunity to comment. We look forward to further discussions with you on these proposals.

Sincerely,

Douglas A. Lee

Enclosure: January 2004 Letter to Manufacturers and Importers of Consumer or Home-use Inflatable Children's Toys

Cc:
Colin Church, CPSC Voluntary Standards Coordinator
Chanté White Mauro, Principal Engineer UL 507