



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

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October 31, 2003

Ms. Kristen Andrews
Standards Department
kristen.l.andrews@us.ul.com

Re: Request for Comments on the Proposed Requirements for the Fifth Edition of the Standard for Single and Multiple Station Smoke Alarms, UL 217, Bulletin Dated October 1, 2003

Dear Ms. Andrews:

This letter presents recommendations from the U.S. Consumer Product Safety Commission (CPSC) staff regarding proposed changes to UL 217, *Single and Multiple Station Smoke Alarms*.

CPSC staff has no additional comments to the proposed changes for topics 1, 3, 4, and 5. CPSC staff has several editorial comments on topic 2 as follows.

2. Visual Indication When a Non-Replaceable Battery Type Alarm is Not in Operational Condition

CPSC STAFF PROPOSAL (New text underlined, Deleted text strikethrough)

8.4 Deactivation of the battery of a smoke alarm that uses a non-replaceable battery with a 10-year minimum battery life shall result in a readily apparent and prominent visual indication. The visual indication shall consist of:

- a) A warning flag that is exposed with the battery ~~removed~~ deactivated and the cover closed ~~with the battery deactivated~~;
- b) A hinged cover that is resistant to being closed with the battery deactivated; or
- c) An equivalent arrangement (such as an audible trouble signal on an AC with battery backup).

~~8.4~~ 8.5 Deactivation of a battery of a battery-operated (or AC with battery back-up) smoke alarm that is intended to be removed from its mounting location for battery deactivation, shall render the unit resistant to reinstallation.

Kristen Andrews

Page 2

~~8.5~~ 8.6 When a warning flag, or equivalent, is employed to comply with the requirements of 8.1 or 8.3, it shall be marked as required in 8.6.

Thank you for the opportunity to make these recommendations. We look forward to participating in further discussions on this matter. The views expressed in this letter are those of the staff and have not been reviewed or considered by the Commission.

Sincerely,

A handwritten signature in black ink, appearing to read 'Arthur Lee', with a large, sweeping initial 'A'.

Arthur Lee
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Directorate for Engineering Sciences