



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
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Mr. Joe Musso  
Chair for STP 1278  
Underwriters Laboratories Inc.  
333 Pfingsten Road  
Northbrook, IL 60062

Dear Mr. Musso:

U.S. Consumer Product Safety Commission (CPSC) technical staff is providing the following comments on the May 14, 2014 Bulletin, "Requirements for Smart Enabled Movable and Wall- or Ceiling-Hung Electric Room Heaters," which Underwriters Laboratories (UL) circulated to the UL 1278 Standards Technical Panel for preliminary review. The views expressed in this letter are those of CPSC staff, and they have not been reviewed or approved by, and may not necessarily reflect, the views of the Commission.

CPSC staff does not support the proposed requirements that allow the incorporation of any of the suggested smart-enabled operations to portable electric heaters as listed in the Bulletin of May 14, 2014. These smart-enabled operations may include capabilities such as remotely monitoring a heater's operating status, distant activation and deactivation of a heater, and changing heater temperature setting and operating mode.

CPSC staff notes a long history of overheating incidents and fires associated with portable electric heaters. These incidents may result from electrically stressing deficient wiring of receptacles and loose heater plug-receptacle connections, as well as failures of electrical components inside portable electric heaters. When consumers are present, these incidents can be detected and extinguished. The CPSC safety alert: (<https://www.cpsc.gov//Global/Safety%20Education/Home-Appliances-Maintenance-Structure/098.pdf>) recognizes the importance of consumers being able to take action. The safety alert includes a warning to consumers that they should never leave heaters operating while unattended.

Revising UL 1278 to allow remote activation of heaters would necessarily eliminate the ability of consumers to detect and extinguish fires. Staff acknowledges that this technology could

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allow the remote deactivation of a heater accidentally left running. However, staff also foresees that the technology could allow consumers to leave heaters on intentionally, with the thought of deactivating the heaters remotely at a later time, but instead forget to turn the heaters off, increasing the possibility of a fire occurring. Furthermore, this technology could allow consumers to turn on heaters before planning to occupy a room, which also can lead to unattended operation.

We appreciate the opportunity to provide comments on the Bulletin of May 14, 2014, and we look forward to participating in further discussions about this standard.

Sincerely,

Mark F. Gill