



February 24, 2022

Diane Haithcock
Standards Program Manager
Building Materials, Life Safety & Security
Underwriters Laboratories and ULC Standards
12 Laboratory Drive
RTP, NC 27709

Subject: Support for One Year Sensor Stability Test for CO Sensors

Dear Mrs. Haithcock:

U.S. Consumer Product Safety Commission (CPSC) staff¹ would like to express our support for the one-year sensor stability test proposed on February 4, 2022, for UL 2034, *Standard for Single and Multiple Station Carbon Monoxide Alarms*. Recently, consensus was achieved for a similar test requirement in UL 2075, *Gas and Vapor Detectors and Sensors*, and aligning these test requirements for carbon monoxide (CO) alarms will enhance the performance of these products.

CPSC staff believes that addressing sensor degradation is critical to the long-term reliability of CO alarms. Quantifying sensor drift through the implementation of the one-year sensor stability test could enhance the reliability and performance of CO alarms available to consumers. Furthermore, aligning test requirements across multiple standards may encourage targeted development of new sensor features to meet multiple standards.

CPSC staff supports the addition of a one-year sensor stability test for CO sensors to the UL 2034 standard.

Sincerely,

Matthew J. Brookman, P.E. PMP
Senior Mechanical Engineer
Laboratory Sciences, Mechanical Division

CC: Jacqueline Campbell, Voluntary Standards Coordinator

¹ The comments in this letter are those of the CPSC staff and have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.