



September 30, 2025

TRANSMITTED VIA EMAIL

Paul Smith, GE Lighting (Proposal Submitter)  
Doreen Stocker, TC 4200 Project Manager (ULSE staff)  
UL Standards & Engagement  
12 Laboratory Drive  
Durham, NC 27709-3995

Dear Mr. Smith and Ms. Stocker:

CPSC staff<sup>1</sup> has reviewed the proposed revision of UL 4200A, *Products Incorporating Button Batteries or Coin Cell Batteries*, dated August 15, 2025. Staff agrees with the revisions made to several figures but is concerned with other aspects of this ballot and intends to vote “No.” If changes are made, staff could reconsider its position. Below, please find two key reasons for the intended “No” vote.

**1. The rationale is inconsistent with the proposal.**

The rationale states: “An additional figure (with respective clauses updated) should be added to clarify that when printing certain figures with a single color that the rectangle around the cell battery shall be maintained.”

The new figure in the proposal, Figure 7C.3, does not have a rectangle around the cell battery. Please clarify whether the rectangle is intended or not in the proposal.

**2. The updates to clauses 7B.1, 7B.3, and 7C.2 create confusion.**

The proposal adds the following clause to sections 7B.1, 7B.3, and 7C.2: “When on a printed label using one color or stamped or molded into the product, use Figure 7C.3.” Figure 7C.3 depicts Figure 7C.2 (the safety alert symbol with coin cell icon) printed in one color. Staff is concerned that this clause in 7B.1 and 7B.3 could be interpreted to mean that the entire warning label on the packaging can be replaced with only the icon when printed in one color. Omitting the entire warning label would eliminate necessary safety information from certain product packaging.

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<sup>1</sup> This letter was prepared by the CPSC staff. It has not been reviewed or approved by, and may not represent the views of, the Commission.

Staff is also unsure if there is a need for the clause in 7C.2 or the new figure 7C.3. If the technical committee concludes that there is a need to clarify how the warning labels or symbols should be depicted in only one color, then staff suggests providing examples of all the warning labels and symbols in only one color. If that is not the case, then staff recommends removing the new clause from sections 7B.1 and 7B.3, and suggests the technical committee discuss potentially removing the additions in section 7C.2 and Figure 7C.3 as well.

Staff appreciates the opportunity to comment. If you have any questions, you may contact me at: [dtaxier@cpsc.gov](mailto:dtaxier@cpsc.gov) or (301) 987-2211.

Sincerely,

*Daniel Taxier*

Daniel Taxier  
Children's Program Manager  
Directorate for Engineering Sciences

cc: Jacqueline Campbell, CPSC Voluntary Standards Coordinator