



November 20, 2022

Ms. Amy K. Walker  
UL 858 Standards Technical Panel Project Manager  
Underwriters Laboratories Inc  
333 Pfingsten Road  
Northbrook, IL 60062-2096

Re: Preliminary Review of Proposed Improvements to Abnormal Operation – Induction Surface Unit Cooking Oil Ignition Test in the *Standard for Safety for Household Electric Ranges*, UL 858

Dear Ms. Walker:

U.S. Consumer Product Safety Commission technical staff (CPSC staff) appreciates the opportunity to comment on the October 21, 2022, proposed improvements to the ignition test for electric ranges with induction surface units that are being circulated for preliminary review.<sup>1</sup> CPSC staff supports the subject proposal from the Association of Home Appliance Manufacturers (AHAM) to expand the test procedures in Underwriters Laboratories (UL) 858 – *Household Electric Ranges* Section 60A to include requirements for ignition resistance of surface cooking elements for induction ranges, with the editorial edits below, to add clarity to the text.

- For Heating Element Size, Table 60A.1 Reference cast iron test pan dimensions and oil amounts, add metric values to dimensions in column 1 and English units to Oil Amount column
- The new clause 60A.8.2 references Figure 60A.1.1, which does not exist in the standard. The clause should reference *Figure 60A.2 Determination of coil heating element size*.
- The wording in new clause 60A.8.3 should match the labeling on *Figure 60A.2 Determination of coil heating element size* as follows (new text underlined and deleted text struck through): “The active area of an induction element is defined as the maximum dimension across ~~coil winding diameter~~.”

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<sup>1</sup> The comments or views expressed in this letter are those of the CPSC staff and they have not been reviewed or approved by, and may not reflect the views of, the Commission.



CPSC staff supports the addition of these new requirements and has worked collaboratively with AHAM and other stakeholders to mitigate surface cooking fires, such as with the pan temperature limiting controls being proposed.(1)

CPSC staff appreciates the efforts of AHAM and its members to develop and submit these proposed modifications to expand the test methods for evaluating coil surface unit ignition resistance to include induction cooktops, and staff supports the changes in Section 60A.

Sincerely,

Arthur Lee  
Senior Electrical Engineer  
Division of Electrical Engineering and Fire Sciences

cc: Jacqueline Campbell, CPSC Voluntary Standards Coordinator

(1) References

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