



February 7, 2023

Marina Currie
Project Manager for STP 101
UL Standards & Engagement
12 Laboratory Drive
Durham, NC 27709-3995

Dear Ms. Currie:

Re: Proposals for *UL 101, Standard for Leakage Current for Utilization Equipment Dated December 23, 2022*

U.S. Consumer Product Safety Commission (CPSC or Commission) staff¹ supports the proposals to revise UL 101, dated December 23, 2022, as proposed. Standards improvements, such as double insulation and the expanded use of ground-fault circuit interrupter technology, have improved electrical shock safety since the early 1970s. In the interest of continuing and further improving electrical shock safety and keeping consumers safe, CPSC staff believes it is imperative that the installation codes, such as the *National Electrical Code*, *NFPA 70*, and the many electrical end-product standards, work together. Expanding Department of Energy requirements for higher energy efficiency of products have resulted in broader use of energy-saving technologies. Motor-driven equipment that uses variable-speed drives to achieve these efficiency improvements has resulted in high-frequency electrical noise or leakage currents, causing nuisance tripping of ground-fault circuit interrupters.

The proposed revisions for testing requirements and GFCI interoperability are needed in UL 101 to complement proposed revisions to UL 943, *Standard for Ground-Fault Circuit Interrupters*, to test for compatibility of a product's high-frequency noise and leakage currents at safe levels, based on available research test data. Staff also supports the adoption of UL 101 requirements for all other electrical end-product standards.

CPSC staff appreciates the opportunity to comment on this matter and encourages industry to adopt these changes without delay.

Sincerely,

A handwritten signature in cursive script that reads "Douglas Lee".

Douglas Lee
Electrical Program Area Risk Manager
Office of Hazard Identification and Reduction

¹ These views are those of CPSC staff, and have not been reviewed or approved by, and may not necessarily reflect the views of the Commission.



United States
Consumer Product Safety Commission

Cc: Jacqueline Campbell, CPSC Voluntary Standards Coordinator

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