



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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November 30, 2017

TRANSMITTED VIA EMAIL

Ms. Diana Pappas Jordan
Chair of STP 2201
Underwriters Laboratories Inc.
333 Pfingsten Road
Northbrook, IL 60062

RE: CPSC Staff Comments on UL's *Proposed Second Edition of the Standard for Determining Carbon Monoxide (CO) Emission Rate of Portable Generators, UL 2201*, Opened for Recirculation on 11-3-2017

Dear Ms. Jordan:

U.S. Consumer Product Safety Commission technical staff (CPSC staff or staff) appreciates this opportunity to express support for the proposed Second Edition of UL 2201 that was opened for recirculation on November 3, 2017.¹ CPSC staff commends UL for working to resolve standard technical panel (STP) members' comments that UL received when UL 2201 was balloted in March 2017. Staff believes that the proposal marks a significant step toward mitigating the risk of carbon monoxide (CO) poisoning deaths and injuries associated with portable generators. CPSC staff voted yes on the original ballot dated March 17, 2017 and does not intend to change its vote in this recirculation.

Staff supports the subject proposal. Timely resolution of any potential issues that are raised during this comment period is paramount to the production of safer portable generators. Staff supports all efforts to reduce deaths and injuries from CO poisoning associated with portable generators, including improved safety standards, increased use of CO alarms, and improved information and education campaigns.

¹ 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.

We hope to build on the momentum from the development of this standard and continue working together to refine the requirements in the future as we move forward. Staff urges UL to quickly establish working groups to address refinements for a future edition as we become aware of any issues and of best practices once products come on the market meeting the standard.

Again, thank you for the opportunity to comment on this important proposal.

Sincerely,

A handwritten signature in cursive script that reads "Janet L. Buyer".

Janet Buyer

cc: Patricia Edwards, CPSC Voluntary Standards Coordinator