



August 7, 2024

Linda L. Phinney
TC Project Manager
UL Standards & Engagement

Dear Ms. Phinney:

Re: *Preliminary Review Only: Power-Supply Cords for Portable LED Luminaires, New Supplement SF, UL 817*

U.S. Consumer Product Safety Commission technical staff (CPSC staff¹) appreciates the opportunity to comment on the July 24, 2024, proposal for portable LED luminaires. Staff has the following recommended edits and other comments on the proposal.

SF1.1 The requirements of this supplement cover power-supply cords intended only for use with indoor use (dry location) portable LED luminaires not employing convenience receptacles, supplementary circuit output connectors, and induction power transmitters.

Rationale: Additional supplementary circuit output connectors and induction power transmitters, such as USB A, B and C ports may draw additional current that exceeds the rated power cord.

SF1.3 The power-supply cords covered by this supplement shall be nondetachable power-supply cords.

Rationale: LED portable luminaires that employ 22 AWG or 20 AWG should have nondetachable power cord sets for the products so that the power cord cannot be removed and used for other appliances that may employ a compatible power inlet.

SF9.1 When a crimp is provided over the insulation of the flexible cord, the assembly shall comply with the Security of insulation test, 11.2, as applicable to cord Type SP-2, SPE-2, or SPT-2, except the applied force shall be 67 N (15 lbf) ~~15 lbs (67 N)~~ for 20 AWG (0.519 mm²) conductors and 45 N (10 lbf) ~~10 lbs (45 N)~~ for 22 AWG (0.325 mm²)

¹ 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.



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conductors.

Rationale: The edits reflect the current notation in 11.2 Security of insulation test.

We look forward to an open dialogue on this topic with UL and all interested stakeholders.

Sincerely,

A handwritten signature in black ink, appearing to read "Arthur Lee".

Arthur Lee
Electrical Engineer
Division of Electrical Engineering and Fire Sciences

CC: Jacqueline Campbell, CPSC Voluntary Standards Coordinator