



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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March 3, 2021

Mr. Fred Reyes
UL LLC
333 Pfingsten Road
Northbrook, IL 60062

Dear Mr. Reyes,

Staff of the U.S. Consumer Product Safety Commission (CPSC) recommends that UL LLC consider shortening, from August 11, 2024, the delayed effective date for enforcement of certification requirements for all ground-fault circuit interrupters (GFCIs) to comply with the supervisory circuit visual indication, alternative auto-monitor compliance criteria D and E requirement in UL 943 - *Standard for Safety for Ground-Fault Circuit-Interrupters* paragraphs 5.15.4 and 6.31.8a.¹ CPSC staff strongly supports these important GFCI safety enhancements that were approved by the Standards Technical Panel (STP) and published in the 5th Edition on February 23, 2018.

CPSC staff looks forward to the widespread integration of these requirements into the circuits where GFCI protection is required. Staff is encouraged by industry efforts, to date, that have produced compliant products already available to consumers before the original effective date of May 5, 2021. Consequently, staff is eager for all products to be compliant as soon as possible, with as little further delay as practicable. Accordingly, CPSC staff urge adoption of an effective date closer to the original effective date of May 5, 2021.

The Arc Fault Circuit Interrupter Wiring Device Joint Research and Development Consortium (Consortium) initially raised concerns to CPSC staff about the 2024 effective date in a September 21, 2020 letter, and subsequently, during a December 16, 2020 teleconference. Although staff expects some manufacturing delays could result from the COVID-19 pandemic, staff believes that industry has had an adequate opportunity to redesign their products and plan for production changes after initial issuance of the 5th Edition in 2018, and before the initial May 5, 2021 effective date. Additionally, although UL LLC had previously permitted a lack of circuit breaker handle movement to meet the visual indication requirement, the STP voted formally in July 2020,

¹ This letter represents the views of CPSC staff, and has not been reviewed or approved by, and may not reflect the views of, the Commission.

to affirm that “visual” indication of failure of a circuit breaker GFCI requires observable physical movement of the circuit breaker handle. An effective date closer to the originally planned May 5, 2021 effective date will help ensure that consumers can benefit from the complete protection of acceptable visual indication means for all product types as soon as practicable.

We appreciate the opportunity to present our position on this matter. CPSC staff strongly maintains that the supervisory circuit visual indication requirement in UL 943 is a significant safety achievement, and thus an earlier effective date is warranted. Manufacturers have had ample time to integrate these requirements into their product designs, and Consortium members indicated that they and other (non-Consortium member) manufacturers produce circuit breakers already compliant with positive visual indication. Consequently, a sooner effective date does not appear to be overly burdensome given the benefits of enhanced shock protection safety for the public. Please let us know if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Douglas Lee". The signature is written in a cursive, flowing style.

Douglas Lee
Electrical Program Area Risk Manager
Risk Management Group

Cc: Randi Myers, UL 943 STP Chair
Patricia Edwards, CPSC Voluntary Standards Coordinator