**LOG OF MEETING**
**DIRECTORATE FOR ENGINEERING SCIENCES**

**SUBJECT:** Meeting with Portable Generators Manufacturers' Association (PGMA) and Exponent Representatives on Warning Focus Group Test Plan and Results

**DATE OF MEETING:** August 12, 2016

**PLACE OF MEETING:** Virtual (teleconference)

**LOG ENTRY SOURCE:** Tim Smith (ESHF)

**COMMISSION ATTENDEES:** Tim Smith (ESHF)

**NON-COMMISSION ATTENDEES:** Patricia Hanz, Joe Harding, John Lee, Susan Orenga, Robert Rauschenberger, Joseph Sala, and Greg Wischstadt

**SUMMARY OF MEETING:**

CPSC staff participated in a teleconference with PGMA and Exponent representatives on the status of focus group testing that Exponent is performing related to warnings on portable generators. The meeting covered the following discussion points:

- The purpose of the testing that is underway was to examine whether there might be room for improvement with the current mandatory generator warning label (*e.g.*, to make the warning more easily understood). Work began with a meeting between PGMA and Exponent in May 2016.

- Exponent is at the very earliest stages of the process, which starts with a series of six focus groups, each with five participants, and would end with comprehension testing of a final label using 30 participants. The mandatory label would be introduced later in the process for participants to consolidate with the other focus group findings and warnings. The testing, therefore, is designed to develop a new label and to test that label for comprehension; not specifically to assess the comprehension of the mandatory label alone.

- Exponent has completed two of six phases of focus groups, which include an equal split of males and females, an equal split of experienced and naive users, and include low-literacy individuals.

- The two completed focus groups began with descriptions of the major hazards associated with portable generators by the moderator, and then a discussion among participants about key words or phrases that participants thought might be useful in a warning on portable generators. Participants then developed "proto warnings" that

covered these issues. CPSC staff inquired about the initial description of the hazards presented to participants, and was told that this description included a description of the CO hazard, that generators are often used as a result of power outages from inclement weather or other natural conditions, that some consumers will bring the generator inside, that the CO hazard also applies when the generator is used near a building, and the potential electrocution hazard from exposure to damp conditions. The moderator offered clarifications if participants inquired about certain hazards, but otherwise stayed out of the discussions.

- Common themes that arose spontaneously in both groups included:

    - the feeling that there should be a standardized poison pictorial,
    - the importance of addressing both indoor use as well as use in an "enclosed space,"
    - the importance of mentioning carbon monoxide (CO) explicitly, and
    - the importance of describing CO (*i.e.*, the characteristics of CO).

- One group expressed concern about the potential conflict between telling people to use the generator outdoors and the electrocution hazard associated with rain or other damp inclement weather. This group suggested that, given a choice, the electrocution hazard seems like it would supersede the CO hazard, and suggested language that said the generator was safe to use in any weather. Another group liked the use of the phrase "silent killer," and suggested additional language that would refer the operator to other materials for more information about hazards.

- CPSC staff noted that issues that came up during testing were consistent with what staff had considered during the development of the mandatory warning label. Staff pointed out that some of the language in the mandatory label included details based on the incident data (*e.g.*, use near open doors or otherwise opening doors and windows), and to try to emphasize the speed with which fatality can occur, rather than comprehension of the hazard alone. Thus, staff suggested that examining intended compliance with the warning may be a useful addition to just comprehension testing. Staff also expressed concerns about "enclosed areas" being misinterpreted by consumers to mean completely enclosed, and pointed out that staff previously identified comprehension problems with the phrase "partly enclosed" among low-literacy individuals in an earlier version of the now-mandatory warning label.