



Secretary/Treasurer:
THOMAS ASSOCIATES, INC.

September 16, 2016

Chairman Elliot Kaye
Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814

Dear Chairman Kaye,

Thank you for taking the time to meet with the Portable Generator Manufacturers' Association (PGMA) on September 6, 2016. PGMA truly appreciates our discussion and our shared goal of developing an industry wide standard to reduce the misuse of portable generators in enclosed spaces. We are encouraged by what we heard and look forward to working with both you and CPSC staff.

As discussed in our meeting, PGMA has begun the process of re-opening the voluntary standard by submitting the ANSI PINS form. PGMA's Technical Committee has already had over 16 technical meetings since the Technical Summit in March and in doing so has developed a framework to address misuse. Specifically, our revision will incorporate a performance strategy focused on CO concentrations, thus allowing companies flexibility in meeting a standard (e.g. reduce CO emissions as a whole, or demonstrate that products will not exceed a CO threshold in an enclosed space). We are well along the way in developing a performance based standard which will effectively address the potential hazard.

We appreciate CPSC staff's willingness to continue to involve all stakeholders in achieving a proactive, technology-based solution. Our on-going efforts will seek to involve staff to the full extent possible so that all parties can understand what needs to be accomplished.

As PGMA moves forward with this initiative, and pursuant to Section 9 of the Consumer Product Safety Improvement Act, we wanted to formally give notice to the Commission that PGMA is re-opening its G300 standard. PGMA is committed to accomplishing the voluntary standard re-write under the guidelines of the ANSI process. Ultimately, we believe that by working together we can use CSPC data on incidents to effectively address the potential hazard of portable generators.

Again, thank you for taking the time to meet with us and we look forward working with you during this Voluntary Standard process in the coming months.

Sincerely,

A handwritten signature in black ink that reads "Susan Orenge" with a horizontal line extending from the end of the name.

SUSAN ORENGA
Executive Director
PGMA

CC: Commissioner Buerkle
Commissioner Mohorovic
Commissioner Robinson
Commissioner Adler
Joel Recht