U.S. CONSUMER PRODUCT SAFETY COMMISSION
ROCKVILLE, MARYLAND 20850

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Eduardo De La Torre
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Re: Industry File Review – Input on Potential Effective Date Extension

Dear Mr. De La Torre:

This letter provides U.S. Consumer Product Safety Commission (CPSC) staff's comments on the proposed effective date extension for ANSI/UL 217, Smoke Alarms, 8th Ed. and ANSI/UL 268, Smoke Detectors for Fire Alarm Systems, 7th Ed. Staff suggests extending the effective date from May 20, 2020 to June 30, 2021.

Staff recognizes the challenges manufacturers and certification labs are facing in meeting the May 2020 deadline for their product models. Nevertheless, staff also wants firms to maximize the availability of new smoke alarms meeting the new standards until the proposed new effective date. The May 2020 effective date was selected, in part, to ensure that smoke alarms and smoke detectors listed for resistance to common nuisance sources would be available to comply with the NFPA 72, National Fire Alarm and Signaling Code effective date of January 1, 2022. CPSC staff believes that UL should establish some intermediate goals for products to be certified to help ensure that products are reaching the market as soon as possible.

CPSC staff fully supports the new smoke alarm performance tests for flaming and smoldering polyurethane (PU) foam fires and common nuisance sources that were incorporated in the 8th edition of ANSI/UL 217 and the 7th edition of ANSI/UL 268. CPSC staff also recognizes the difficulty for manufacturers to meet these new performance requirements. To meet the new

requirements, manufacturers must re-design all of their residential and commercial alarms. The resulting redesigned smoke alarms and detectors will then require new third party certification for all models. Thereafter, manufacturers will need to ramp up their production (re-tooling production lines and acquiring new components) across all of their new models.

Although CPSC staff understands the issues leading to the new effective date and supports the change, staff suggests developing some intermediate thresholds for products to be certified, to help maximize the availability of smoke alarms meeting the 8th Ed and detectors meeting 7th Ed.

Thank you for the opportunity to make these comments. We look forward to participating in additional discussions to improve life safety.

Sincerely,

Arthur Lee
Electrical Engineer
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Cc: Sarah Owen, UL Principal Policy Advisor for Government Affairs
Patricia Edwards, CPSC Voluntary Standards Coordinator