



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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July 20, 2012

Mr. Mitchell Gold
UL 4200A Project Manager
Underwriters Laboratories Inc.
455 E. Trimble Road
San Jose, CA 95131-1230

Re: Request for Comments on Proposed First Edition of the Standard for Safety for Products
Incorporating Button Cell Batteries of Lithium or Similar Technologies, UL 4200A

Dear Mr. Gold:

U.S. Consumer Product Safety Commission (CPSC) staff appreciates this opportunity to provide comments on the proposed standard for products that incorporate button/coin cell batteries.¹ CPSC staff strongly supports this effort to address hazards associated with battery ingestion and views the earliest possible integration of these proposed design features into products as an important step. We believe that the necessity to use tools or dual-action mechanisms to open battery compartment access doors will significantly decrease the exposure of children to hazardous batteries. We also support warning labels on the products and in product instructions.

With respect to warning labels, CPSC staff believes that there also should be requirements for warning labels in and on product packaging. We suggest including requirements for how products are to be packaged, as indicated below. The rationale is that product packaging serves an important role in educating consumers about the proper control and disposal of batteries during assembly and battery replacement. CPSC staff suggests adding the following requirement to the proposed standard:

The warnings prescribed in Clause 8.2 (a) and (b) shall also be printed on at least one side of the product packaging, with the words at least X inches (Y mm) in height, and in a contrasting color from the background. Battery-powered auxiliary devices, such as remote controls that serve a supplementary function to the primary device, shall be enclosed in their own packaging that is marked with the warning as above. A button/coin cell that is provided with the product or with the auxiliary device, but that is outside of the compartment into which it is to be installed, shall be enclosed in its own child-resistant packaging and then inserted into the packaging of the auxiliary device.

Again, thank you for proposing this important standard. If you have any questions, or need additional information, please feel free to contact me.

¹ The comments or views expressed in this letter are those of the CPSC staff and they have not been reviewed or approved by, and may not reflect the views of, the Commission.

Sincerely,

A handwritten signature in black ink that reads "Douglas Lee". The signature is written in a cursive style with a large, prominent 'D' and 'L'.

Douglas Lee

cc: Colin Church, CPSC Voluntary Standards Coordinator