



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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January 18, 2013

Ms. Barbara Davis
STP 60065 Project Manager
Underwriters Laboratory Inc.
455 E. Trimble Road
San Jose, CA 95131-1230

Re: Preliminary Review and Comment of proposed changes in requirements to Annex I
in the *Standard for Audio, Video, and Similar Electronic Apparatus – Safety
Requirements*, UL 60065

Dear Ms. Davis:

U.S. Consumer Product Safety Commission (CPSC) staff appreciates this opportunity to provide comments on the preliminary proposed changes to UL 60065.* CPSC staff comments on the Proposed Revision for Annex I (Safety Requirements for Coin/Button Cell Batteries) for Lightweight Products in UL 60065 are below:

1.21.1 Construction

CPSC staff believes that two independent and simultaneous movements are needed to ensure that a child does not have access to the battery. Two independent and serial movements would not be adequate to protect against access to the battery. Serial movements would be acceptable only if a locking mechanism is used, which requires a minimum force of 10 lbf (45N) to activate the release mechanism.

Rationale: These requirements are consistent with accessibility and locking requirements used in many ASTM juvenile product standards (ASTM F963, *Standard Consumer Safety Specification for Toy Safety*, ASTM F2012, *Standard Consumer Safety Specification for Stationary Activity Centers*, ASTM F2194 *Standard Consumer Safety Specification for Basinets and Cradles*).

1.21.3.2 Impact Test and 1.21.4 Compliance

CPSC staff believes that test requirements for impact and compression should not be reduced to the levels proposed, which are based on the levels needed to maintain function of the product. The requirements should be set at impact and compression levels that have been established to ensure that children are not exposed to button and coin cell batteries. ASTM F963 has established levels for normal use and foreseeable abuse of objects to which children will be exposed.

Rationale: Children will be exposed to these products in a manner similar to toys, and these products should meet requirements for normal use and foreseeable abuse, as established in ASTM F963.

Sincerely,

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

Douglas Lee

cc: Colin Church, CPSC Voluntary Standards Coordinator