



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207

September 14, 2004

Ms. Heather Sakellariou
Secretary for STP 2201
Underwriters Laboratories, Inc.
333 Pfingsten Road
Northbrook, IL 60062

Re: Request for Comments on UL correspondence dated May 21, 2004 pertaining to Subject
2201 *Portable Engine Generator Assemblies*

Ref: UL correspondence dated May 21, 2004 which contains

- a) Comments received on UL's Subject 2201 Bulletins dated February 28, 2003 and August 15, 2003 and responses to those comments.
- b) Proposed revisions to the Proposed First Edition of the Standard for Portable Engine-Generator Assemblies, UL 2201

Dear Ms. Sakellariou:

This letter presents the U.S. Consumer Product Safety Commission (CPSC) staff's comments regarding the subject standard. Please note that the views and comments contained in this letter were prepared by the CPSC staff, have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

In reviewing the referenced document, CPSC staff noticed an oversight in the resolution of CPSC staff's comments. On pages A1 and A2 of the referenced correspondence (see attachment 1), CPSC staff's comments on the August 15, 2003 and February 28, 2003 draft versions of the proposed standard for Portable Engine-Generator Assemblies, UL 2201, are provided. Also provided are UL's response and disposition to those comments, which state that the issue was discussed during the November 2003 STP meeting and that Task Group 1 is addressing it. Per attachment 2, the objective of Task Group 1 is to develop and propose requirements for CO poisoning warning/caution markings. Weatherization and performance requirements are not within the scope of this working group. CPSC staff suggests, for the purpose of clarification, that the comment resolution matrix be revised to include the reasons why CPSC staff's recommendations for weatherization and performance requirements are not being addressed in Subject 2201.

Regarding the proposed on-product warning label that is depicted in Figure 41.1 (see attachment 3), CPSC staff suggests that the warning label refer to CO, by name, as the hazard and state that the user cannot see or smell CO. Staff agrees that providing a description of where not to place the generator during use, including specific location examples, is advisable. However, staff believes the label should also describe where, precisely, the generator should be placed during use to improve the likelihood that the user will choose a location that does not expose the user or others to the CO hazard.

Also, the Markings section of the standard (section 41) currently does not address labeling on the packaging. CPSC staff suggests that the STP consider this type of labeling so that the consumer is informed about the proper use of the product and the CO hazard posed by the product at the point of purchase. Currently, portable generators are not weatherized for use in inclement weather and CPSC staff believes that the consumer should be advised of this in the event that he/she is making the purchase because of an emergency situation which is caused by ongoing inclement weather.

Lastly, the Temperature Test section of the standard (section 19) does not require any tests below 50°F. CPSC staff believes requirements for tests at or below freezing ambient temperature should be included to verify generator operability when used in cold weather. This is particularly relevant to generator use when power is lost due to ice storms.

Thank you for the opportunity to provide these comments to the STP. CPSC staff is pleased to continue to work with UL and other STP members on UL 2201.

Sincerely,

Janet L. Buyer
Project Manager

Attachments:

- 1) Pages A1 and A2 of Appendix A “Comment Matrix” from UL correspondence dated 5/21/04 for UL 2201
- 2) Page D1 of Appendix D “STP Working Groups and Action Items” from UL correspondence dated 8/15/03
- 3) Page B59 of Appendix B “Revised Requirements for the Proposed First Edition of the Standard for Portable Engine-Generator Assemblies, UL 2201” from UL correspondence dated 5/21/04 for UL 2201