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LOG OF MEETING
DIRECTORATE FOR ENGINEERING SCIENCES

SUBJECT: Progress Report on Several Activities Between UL and CPSC

DATE OF MEETING: August 21, 1995

PLACE OF MEETING: East-West Towers, Bethesda, MD

LOG ENTRY SOURCE: Erlinda M. Edwards, ESEE *me*

COMMISSION ATTENDEES:

Ronald Medford, EXHR

Andrew G. Stadnik, ES

William H. King, ESEE

Edward W. Krawiec, ESEE

Erlinda M. Edwards, ESEE

Nicholas Mogan, ESEE

Carolyn Meiers, ESHF

Kimberly E. Long, EHHA

Julie I. Ayres, LSEL

NON-COMMISSION ATTENDEES:

Don Talka, Underwriters Laboratories, Melville, NY

David Haataja, Underwriters Laboratories, Washington, DC

SUMMARY OF MEETING:

The meeting was held to provide an update of several issues on which CPSC and UL have mutual interests.

Ground-Fault Circuit-Interrupters

Carolyn Meiers provided an update on the revised installation instructions which Advanced Institutes for Research (AIR) is designing under a contract with National Electrical Manufacturers Association (NEMA). Ms. Meiers, who is acting as liaison with NEMA, stated that she had been invited to attend a meeting with AIR and industry representatives on July 27, 1995 to discuss four design options.

Don Talka provided an update on UL's proposal for a visual, miswiring indicator. (In a March 17, 1995 Bulletin, UL requested comments on its proposal to require a visual indicator on GFCIs. The visual indicator would provide immediate feedback to an installer, when the GFCI was tested, whether the device had been miswired. The indicator would obviate the need for the installer to provide his own lamp or other appliance during the test sequence.) Mr. Talka stated that UL intended to withdraw its proposal for the following reasons:

- Anticipated effectiveness of the label covering the load terminals (effective July 4, 1995), which warns the installer that the load terminals are for feedthrough purposes only.
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- Anticipated effectiveness of the improved installation instructions.
- At the request of NEMA, AIR provided its opinion regarding the proposal. Based upon those comments, UL felt it appropriate to withdraw the proposal.

A copy of AIR's comments, discussed in a June 15, 1995 letter, were provided to all participants.

Ronald Medford inquired as to whether UL was totally backing away from its previous commitment for a visual indicator. Mr. Talka responded that UL merely wanted to slow things down a bit. Mr. Medford asked if that, then, meant a longer effective date. Mr. Talka explained that a non-standardized method for determining miswiring may lead to confusion on the part of the installer. UL would first like to see if the instructions will be effective, and reassess if necessary. While Mr. Medford agreed that standardization of the indicator is a good idea, he stated that it is appropriate to do both. Instructions alone cannot be relied upon - no matter how good they are.

Ms. Meiers added that she believed indicator lights should be required on GFCIs. Usability testing conducted by CPSC indicated a likelihood that consumers would test by merely pressing the test and reset buttons and not plugging in a light. She suggested that a GFCI, which is provided with a visual indicator, be usability tested. She also stated that the new instructions being prepared by AIR will be "usability tested" and may give an indication of their effectiveness.

Mr. Medford requested that UL postpone its withdrawal of the proposal until CPSC has had an opportunity to meet with NEMA and AIR to discuss their comments. He also asked that CPSC be given the opportunity to provide a written response to the AIR comments. Mr. Talka agreed to wait and asked that UL also be represented at the meeting with NEMA and AIR.

Decorative Lighting

Mr. Talka advised that tier 2 efforts, a general upgrade of the UL 588 standard, are being undertaken. Upgrades will include such things as increasing the minimum wire size from 24 to 22 gauge, requirements for fuse holders, requirements for protection against ultraviolet light, and outdoor use requirements. An Industry Advisory Committee (IAC) meeting is proposed for October. Messrs. Stadnik and King offered to speak to the IAC, if it was considered necessary.

Mr. Talka stated that CPSC should be aware that increased requirements will either increase the price of decorative lighting/outfits or result in a lot of unlisted product. Bill King responded that CPSC intends to work with Customs to monitor non-listed product. If there is an erosion of support for the UL standard, CPSC will try to match this with aggressive follow-up, working closely with Compliance.

Dave Haataja added that, if CPSC's monitoring focuses on unlisted products, it may lead to an incentive for counterfeit labels. UL's holographic label, which has been used on decorative outfits, will be appearing on light strings this year. Mr. Haataja offered to provide a sample of the label, which could be used to show Customs. He also offered to provide past

examples of counterfeit labels. Julie Ayres pointed out that the UL Mark appears on the product, not necessarily on the box in which the product is packaged.

Thermoplastics

Ed Krawiec stated that CPSC is waiting for UL to start Task 2 of the UL Action Plan, which is to form a committee representing UL, CPSC, and interested industry representatives. The committee will define any UL research which may be needed. Mr. Krawiec added that Bob Davidson (UL/Melville) had a good handle on the issue and how to approach its resolution.

Dave Haataja explained that any research funded through the plastics surcharge is controlled by the steering committee. The committee determines the type of research and the action plan for that research. He added that he thought either Raffik Alley or Cliff Jones (UL/Melville) must be involved, since they have access to the surcharge.

Smoke Detectors

Julie Ayres related her concern with UL's response (as well as its timeliness) to CPSC recommendations made at UL's January 1995 IAC meeting. Paul Patty (UL/ Northbrook) responded to the recommendations on May 30, 1995. Of the recommendations offered, only two were accepted by UL for inclusion in the new edition of the standard. Ms. Ayres added that, for those issues which are not currently being considered by UL and about which CPSC staff feel strongly, we will continue to push for their adoption.

Mr. Medford concurred that, based upon the evidence which CPSC provided to support its recommendations, UL's response was not suitable.

Portable Electric Air Heaters

Mr. Haataja wished to confirm that the vote on the petition was 3-0 to deny and that, since UL and CPSC have no current plans regarding heaters, the subject is closed.

Andrew Stadnik stated that in Fiscal Year (FY) 1997, CPSC will again look at the data. There is an obligation to look at post-1991 heaters to see if there is information available which suggests that further action is required.

Aluminum-Copper Wire Twist-On Connector

Mr. Stadnik stated that staff's main concern with the connector is that it will be used for aluminum-to-aluminum connections, even though the listing says that it is not appropriate for such a connection; and it is not clear that it is inappropriate except at the end of the line.

Mr. King reported that he had agreed, during an August 16 telephone conversation, to send a test plan for the connector to Jake Killinger (UL/Northbrook). A draft of the test plan is currently under review, and he hoped to fax it to Mr. Killinger within a couple of days.

Teleconferences

Linda Edwards stated that UL has been very cooperative in providing access to their engineers to discuss technical issues which may arise from UL Bulletins on proposed requirements. It was also CPSC's understanding that the teleconferences could be used to

discuss other topics which may become of interest to either CPSC or UL. Based upon a meeting between Mr. Stadnik and Mr. Beyreis, it was assumed that UL representatives, such as Mr. Beyreis, would be involved in the teleconferences. However, that has not been the case.

Mr. Haataja stated that CPSC has been given access to UL's primary designated engineer because they are most knowledgeable about the technical issues being addressed. If there are policy issues which CPSC would like to address, the IAC Chairman may be included in the teleconferences.

Seminars

Mr. Stadnik stated that he is waiting to hear from Steve Wasserman (UL/Northbrook) regarding CPSC staff attendance, at no cost, at UL seminars on Globality and Plastics. Mr. Stadnik offered to have staff make a presentation at the Plastics seminar. Mr. Wasserman was in the process of checking with UL's General Counsel to see what arrangements could be made.

Technical Advisory Panels

The list of subjects for which CPSC is interested in forming TAPs was sent to Bob Williams (UL/Northbrook) by Colin Church. Margaret Neily was listed as the key contact person for some TAPs. Those were changed to indicate that Julie Ayres would be the key contact person on Smoke Detectors, and Rikki Khanna would take over those involving Fire. How the TAPs will be implemented will be determined by UL.