



## NATIONAL CONSUMERS LEAGUE

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December 1, 2017

TRANSMITTED VIA EMAIL

Ms. Diana Pappas Jordan  
Chair of STP 2201  
Underwriters Laboratories Inc.  
333 Pfingsten Road  
Northbrook, IL 60062

The National Consumers League (NCL) – the nation’s pioneering consumer advocacy organization joins with other entities – including the Consumer Product Safety Commission (CPSC) and industry organizations such as the Portable Generator Manufacturers Association (PGMA) and Underwriters Laboratory (UL), in recognizing the need to provide to consumers with an increased awareness about the hazards associated with carbon monoxide (CO). NCL has a longstanding working relationship with both UL and the CPSC.

Both PGMA and UL have proposed requirements for manufacturers of portable generators to meet certain criteria that include lower overall CO emissions, alarms at certain measureable CO levels, and an automatic shut-off of the engine if certain CO levels are detected. NCL fully supports these efforts to improve safety measures for consumers using portable generator sets and is committed to working with industry to address the hazards associated with the use of portable generators.

Specifically, NCL supports the proposed 2nd edition to UL2201 requirements which aims at reducing different types of known CO incidents. Specifically, UL2201 requires reduction of overall engine-out CO levels in portable generator sets to 150 grams/hour and aligns the shut-off limit to 400 ppm, as in UL2034, regardless of time exposure. This is the only published testing standard that includes a technical requirement for addressing the CO hazard. Additionally, NCL believes that that using applicable EPA methods and procedures as a reference helps to establish a repeatable & reproducible emissions test result that includes durability & tamper-proofing requirements that are widely understood.

Industry members have noted that they have not found this standard to be unduly burdensome to meet the EPA & CARB emissions requirements, and can in fact assist in further reducing the CO emissions to safer levels than exist today. For the reasons stated above, we support UL adopting the proposed 2<sup>nd</sup> edition to UL2201 toward reducing CO emissions. Thank you for considering NCL’s support for updating this standard.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sally Greenberg', is written over a light blue horizontal line.

Sally Greenberg  
Executive Director