

UNDERWRITERS LABORATORIES INC.

SEPTEMBER 1, 2006

TO: PARTICIPANTS UNDER UL'S CLIENT INTERACTIVE PROGRAMS

SUBJECT: ENHANCEMENTS TO THE CLIENT INTERACTIVE PROGRAMS

The following serves to provide you with information and background detailing the enhancements that are being implemented under the Client Interactive Program (CIP).

This information is applicable to all of the UL files and activities for which you are currently participating under the Client Test Data Program (CTDP), Total Certification Program (TCP) or Third Party Test Data Program (TPTDP).

Investigations of products by Underwriters Laboratories usually involve the testing of samples of the products. While Underwriters Laboratories maintains extensive facilities for these purposes, it is also possible to utilize manufacturer's or other external test facilities. UL's Client Interactive Program (CIP) was established to collaborate with UL's clients to achieve certification of products in less time, and avoid unnecessary duplication of facilities and effort.

Test Data used for making the UL Mark certification decision is developed and recorded from various sources:

- A. at UL sites, satellites, affiliates and Licensees by UL employees,
- B. at manufacturer's test facilities by manufacturer's personnel under supervision and witness of UL personnel (under the Witnessed Test Data Program (**WTDP**)), and
- C. at the manufacturer's or other designated facility under a laboratory quality program which has been assessed and determined by UL to be equivalent to UL's facilities for the performance of the testing. Test data generated and utilized by UL is subject to review and audit (under the Client Test Data Program (**CTDP**), the Third-Party Test Data Program (**TPTDP**) or under the Total Certification Program (**TCP**)).

During UL's application of the CIP policies, UL's Accreditors, such as OSHA, ANSI, and SCC have required compliance of UL's facilities with ISO / IEC 17025:2005 "General Requirements for the Competence of Testing and Calibration Laboratories." The application of these requirements by UL's Accreditors ensures global competence and consistency in the conduct, development and recording of test data.

UL's Data Acceptance Program (DAP) was implemented on July 1, 2006 and is intended to replace the Client Interactive Program completely on July 1, 2007. One of the key principles that define UL's data acceptance policies is that regardless of where test data is generated and recorded, the methodology, requirements, and conditions must be equivalent to that used for data developed and recorded at any of UL's global sites.

Accordingly, UL wants to clarify the requirements in UL's Data Acceptance Policies (DAP). As with the former CIP programs, the DAP policies encompass the following critical areas (*where noted, paragraph references are to ISO / IEC 17025:2005*):

LABORATORY QUALITY SYSTEM

All CTDP, TCP and TPTDP laboratory operations shall be organized with documented procedures and policies in place to assure accuracy and correctness of the performance of the tests, the data obtained and the results reported. The system is based on ISO/IEC 17025:2005 and encompasses the test equipment, test environment, personnel qualifications, test standards and procedures, and data recording and reporting procedures.

For WTDP activities, it is not necessary for the quality systems to be documented since qualified UL staff are witnessing 100 percent of the testing, reviewing the calibration certificates of test instruments used, actual environmental conditions, as well as other testing specific criteria, for each test / visit.

TCP additionally requires ISO 9001-2000 registration either with UL or from an organization other than UL with the report reviewed by UL to determine equivalency.

LABORATORY FACILITIES

All test facilities must have the physical resources, equipment, and qualified personnel and procedures needed to conduct the testing. In order to accept test data generated at locations other than at a UL site, initial and periodic assessments are made of the test facilities, along with prescribed verification of the test data generated. UL must be confident that the data being submitted for consideration is of the same quality and completeness as test data recorded at a UL site. As such, all data submitted is required to be thoroughly reviewed and audited. It is UL's responsibility to make the certification decision, by verifying the compliance with all applicable laboratory requirements.

TEST EQUIPMENT (5.5 / 5.6)

All laboratories are to be furnished with test equipment sufficient for the correct performance of tests in accordance with the test standard or procedure used. The equipment shall be at least as accurate as specified or implied in the test standard or procedure. The equipment shall be maintained in good working order and calibrated. Instruments shall be calibrated to a nationally or internationally recognized standard of measurement or standard reference material.

Effective July 1, 2007, test equipment calibration shall additionally be conducted by an accredited calibration laboratory. (Calibration laboratories accredited by ILAC Participants (A2LA or NIST/NVLAP, UKAS, SCC, NATA, JCSS, JAB, DKD, JNLA UKAS,

NATA, SCC, IAS), or other nationally recognized Accrediting Body (APLAC fully recognized, EA fully recognized.)

TEST ENVIRONMENT (5.3)

All test areas shall have the proper energy resources, lighting, temperature control, humidity control and other environmental conditions needed to conduct the tests. The laboratory shall effectively monitor and control those factors that affect the testing conducted.

PERSONNEL QUALIFICATIONS (5.2)

All testing personnel shall have the necessary education, training, technical knowledge and experience to conduct the tests. The personnel shall be familiar with and have an in-depth understanding of the requirements pertaining to the test to be conducted. Personnel shall be sufficiently independent and free from financial or other pressures that may affect the conduct of the tests and the reporting of the results.

TEST STANDARDS AND PROCEDURES (5.4)

For participation in the CTD, TPTD and TCP programs, it is necessary for the participants to have and maintain up-to-date copies of the applicable Standards and other documents describing the methods and procedures for conducting the tests. Standards and documents shall be readily available to all applicable personnel for the conduct of the tests.

DATA RECORDING AND REPORTING

A description of the test method or reference to the test method used (Standard name, Standard number, edition or issue date, latest revision date, and clause and test name) and all data observed shall be recorded. Data shall be recorded on form or standard laboratory data sheets in ink. All DAP participants shall use form UL data sheets if possible. The use of non-UL form data sheets will require further review by UL when used, to assure compliance with UL data recording procedures.

INITIAL DATA VERIFICATION

For CTD, TPTD, and TCP participants, initial test data for each new type of test to be covered will be verified. The test data may be verified by one of the following:

- Correlation of external generated test data with test data generated at one of UL's laboratories.
- Correlation of client test data with test data generated at the external facilities under the witness and supervision of UL personnel.

OVERSIGHT AND AUDIT

All test data will continue to be thoroughly reviewed by UL. The review includes:

- Correct sample(s) tested.
- Correct test method utilized
- Test results.
- Test equipment used.
- Data recording procedures.
- All required tests performed.
- Appropriateness of justification for tests not performed.

Under the DAP policy, UL will annually verify each test type considered for data acceptance. For example, if test data per UL xxxx covering an Abnormal Operation Test, an Impact Test, and a Cycling Test is submitted, it is necessary to verify each of these three tests at least once annually, before the data can be considered for acceptance under DAP. Therefore it is crucial that UL continues to collaborate with DAP participants when the plans for the investigation are being developed, to ensure that UL staff could participate directly when the tests are being conducted if the verification for that specific test has exceeded 12 months since the last UL verification.

GENERAL ASSESSMENT OF LABORATORY OPERATIONS

Under TPTDP, each test facility submitting data will continue to be annually assessed to verify conformance with the program. Each test facility will continue to require a documented Quality system and be assessed on an annual basis to all of the elements of ISO / IEC 17025:2005.

Under CTDP and TCP, each test facility submitting data shall be annually assessed to verify conformance with the program and the applicable requirements of ISO / IEC 17025:2005

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| Clause 4.6 | Purchasing Services and Supplies (Test consumables such as cheesecloth, thermocouples, etc) |
| Clause 4.9 | Control of Non-Conforming Tests or Calibrations (Test instrument trace back system) |
| Clause 5.2 | Personnel (Lab technicians) |
| Clause 5.3 | Accommodation and Environmental Condition |
| Clause 5.4 | Test and Calibration Methods and Method Validation (Standards and test data sheets) |
| Clause 5.5 | Equipment |
| Clause 5.6 | Measuring Traceability (Test instrument calibration program) |
| Clause 5.8 | Handling of Tests and Calibration Items (Sample handling and identification) |

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| Clause 5.10.1 Calibration Criteria (If calibration is done in house at client facility) |
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Under WTDP, the test facility continues to be assessed by UL staff at the time of each visit, to assure that calibrated test equipment, environmental conditions and lab staff that can operate the test equipment are being used to conduct the tests.

In addition, for CTDP, TPTDP, and TCP participants, it is the laboratories' responsibility to notify UL between visits of any changes in equipment, personnel, etc., material to the program. Based on the changes made, UL may decide to reassess the facility to reevaluate conformance with the program. Assessments and coverage under the Program are test and product category specific. Coverage afforded a test laboratory for certain tests and product categories that do not necessarily afford coverage for other tests or categories.

SPECIFIC TECHNICAL CAPABILITY ASSESSMENT

Under CTDP, TPTDP, and TCP, the laboratory shall undergo an assessment to confirm the capabilities and qualifications to perform testing to specific standards and requirements. The assessment, which will be repeated as necessary when new capabilities, technicians, etc are added to the original scope of participation, will cover :

- Facilities - space, test rooms, environmental controls, power sources, fuel supplies, etc.
- Measurement and test equipment - meters, tools, chambers, etc.
- Standards - availability of specific standards.
- Personnel - specific knowledge and skills.
- Test performance - review of tests being performed.
- Data recording - review of practices.

AGREEMENTS

Agreements that formalize the relationship, roles and responsibilities are currently required for TPTDP participants.

Effective July 1, 2007, a signed agreement will also need to be on file at UL that will formalize the relationship between CTDP participants and UL. The office that you normally work with will provide you with the agreement.

UL staff will continue to work with our DAP participants, providing the necessary support to ensure that participant's physical laboratories and methods are equivalent to UL facilities. Please direct any questions you have regarding DAP implementation or the DAP requirements to your usual UL Conformity Assessment Services contact person. Attached as Appendix A, is a tabulation identifying the local Data Acceptance Policy Coordinators who can also assist you if needed.

UL understands that these enhancements and clarifications to UL's Data Acceptance Policies may result in some changes to previous practices. Therefore it is UL's intent to continue to work with DAP participants to ensure that full compliance to the DAP policy is achieved by July 1, 2007. Your continued cooperation is very much appreciated as we continue to maintain the integrity and acceptance of the UL Mark.

Very truly yours,

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Director – North American Certification Programs

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Appendix A

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