



Consumer Federation of America

December 1, 2017

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

Sent via email: Diana.Pappas.Jordan@ul.com

Re: Proposed Second Edition of the Standard for Determining Carbon Monoxide (CO) Emission Rate of Portable Generators, UL 2201

Dear Ms. Jordan,

Consumer Federation of America (CFA) is an association of more than 250 non-profit consumer organizations that was established in 1968 to advance the consumer interest through research, advocacy, and education. CFA is writing to support the Proposed Second Edition of the Standard for Determining Carbon Monoxide (CO) Emission Rate of Portable Generators, UL 2201.

It is imperative that strong standards be developed to protect consumers from the known hazards caused by carbon monoxide emissions from portable generators. Risks posed by these products were highlighted by the recent destructive hurricane season in the United States which knocked out power to millions of homes. The recent hurricanes created periods of increased portable generator use, and resulted in at least fourteen deaths in Florida alone.¹ While CFA supports the U.S. Consumer Product Safety Commission's rulemaking: Safety Standard for Portable Generators,² CFA also supports strengthened voluntary standards that significantly reduce the risk to consumers.

CFA supports that the Proposed Second Edition of the Standard for Tests for Determining Carbon Monoxide Emission Rates for Portable Generators, UL 2201 addresses risks from carbon monoxide in two ways. We support the dual approach that includes decreasing carbon monoxide emissions as well as including an automatic shut off. We appreciate the progress that this standard has made and look forward to working with UL and others to effectively decrease deaths and injuries associated with carbon monoxide poisonings associated with portable generators.

¹ <http://www.theledger.com/news/20171130/as-hurricane-season-ends-issues-linger>

² <http://consumersunion.org/wp-content/uploads/2017/04/CU-CFA-comments-to-CPSC-on-portable-generators-4-24-2017.pdf>

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Rachel Weintraub". The signature is written in a cursive style with a horizontal line extending to the right from the end of the name.

Rachel Weintraub
Legislative Director and General Counsel