



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

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Ms. Amy Walker
Project Manager for STP 0858
amy.k.walker@us.ul.com

Re: Request for Comments on the Proposed Requirements to Improve Consumer Awareness and Installation Practices Relative to Range Stability, Bulletin dated August 7, 2009

Dear Ms. Walker:

This letter presents recommendations from the U.S. Consumer Product Safety Commission (CPSC) staff* on proposed changes to the Underwriters Laboratories (UL) standard for *Household Electric Ranges* (UL 0858), to improve awareness of the tipover hazard associated with ranges.

CPSC staff has the following comments on topic 1, Proposed Requirements to Improve Consumer Awareness and Installation Practices Relative to Range Stability:

- While CPSC staff does not object to the use of additional labeling and marking to assist installers and to improve consumer awareness of the tipover hazard associated with ranges, staff is concerned that additional markings and labels may not increase the percentage of new units installed with anti-tipping devices because there is insufficient data to determine the reasons why installers and consumers do not install mounting (anti-tip) brackets.
- In the following proposed changes to UL 0858, the text refers to “primary” and “secondary” methods for securing the appliance. CPSC staff does not understand why there is a distinction between primary and secondary securing means. Using “primary” and “secondary” terminology may be misleading in that it implies that one method is better than the other method. If both methods perform adequately in securing the range, the instructions should not distinguish any preferable method.

35.3.4 When mounting hardware for securing the appliance to the wall, floor, or cabinet structure is required in order to comply with 35.3.1 and 35.3.3, the appliance shall comply with all of the following:

a) A primary fastening means shall be provided to secure the appliance to one of the constructions specified in 35.3.6. A secondary fastening means shall also be provided to secure the appliance to a second construction specified in 35.3.6. (Only one means of securing the appliance is intended. In the event the primary fastening means is not suitable for the specific

*These comments are those of CPSC staff, have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

installation, a secondary fastening means shall be available, using the same device or a separate device.) All hardware, including fastening devices, screws, wall anchors, and similar devices, required to ~~install~~ secure the appliance as intended to ~~one~~ two or more of the constructions specified in 35.3.6 shall be provided with the appliance, including instructions in the same package. The package shall be located where it will be apparent to the installer.

- The proposed markings show only a child tipping over the range, but the text clearly states a child or an adult can tip over the range. CPSC staff is aware of incidents involving older adults tipping over a range. The figures should also illustrate an adult tipping over the range as it currently illustrates in Figure 79.2 of the UL standard.
- In Figure 80.2, in the last line of text in the box titled “Tip-Over Hazard”, “childrens” should be “children.”

(PROPOSED)

Figure 79.2

Range stability marking – visible to installer


	▲ WARNING
	<p style="text-align: center;"><u>Tip-Over Hazard</u></p> <p>A child or adult can tip the range and be killed.</p> <p>Install anti-tip device to range and/or structure per installation instructions.</p> <p>Engage the range to the anti-tip device installed to the structure.</p> <p>Re-engage anti-tip device if range is moved.</p> <p>Failure to follow these instructions can result in death or serious burns to children and adults.</p>
<p>Show specific manufacturer illustrations and instructions for checking the installation of anti-tip device.</p>	

Figure 80.1

Range stability marking – visible from front



	▲ WARNING	<p>Show illustrations and/or instructions for checking the installation of anti-tip device.</p>
	<p style="text-align: center;"><u>Tip-Over Hazard</u></p> <p>A child or adult can tip the range and be killed.</p> <p>Check installation of anti-tip device per installation instructions.</p> <p>Check engagement of anti-tip device if range is moved per installation instructions.</p> <p>Failure to follow these instructions can result in death or serious burns to children and adults.</p>	

Figure 80.2

Range stability marking – consumer removable label

	▲ WARNING
	<p style="text-align: center;"><u>Tip-Over Hazard</u></p> <p>A child or adult can tip the range and be killed.</p> <p>Verify the anti-tip device has been installed.</p> <p>Ensure the anti-tip device is re-engaged when the range is moved.</p> <p>Do not operate the range without the anti-tip device in place.</p> <p>Failure to follow these instructions can result in death or serious burns to childrens and adults.</p>
<p>Show specific manufacturer illustrations for checking installation/engagement of anti-tip device.</p>	
<p>CONSUMER INFORMATION - THE INSTALLER SHALL NOT REMOVE</p> <p>Before removing label, ensure anti-tip device is properly installed.</p>	

- The text is shown only in English. If it has not been determined that installers and consumers of these appliances can read English, it is suggested that additional text in a second language be included, such as Spanish. Additional research to determine the second language may be needed.
- The proposed wording of the standard seems to require the warning text but not the pictorials (e.g., 79.15 states "...shall be marked with text as illustrated..."). CPSC staff suggests the wording should be modified to "...shall be marked with text and illustration as shown in figure..."
- In the rationale section of the bulletin, it is noted that the warning pictorial "has been consumer tested to 95% or better comprehension." CPSC staff would be very interested in receiving information regarding how the pictorial was tested (e.g., the specific protocols, a description of the sample population, the comprehension criteria employed) and the results of the tests.

CPSC staff is presently evaluating the stability of ranges to determine the factors leading to range tipovers. We plan to share the results of the staff's evaluation with UL when the work is completed.

Thank you for the opportunity to provide comments on the proposed requirements to improve consumer awareness and installation practices relative to range stability. We look forward to participating in further discussions on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Kumagai". The signature is fluid and cursive, with the first name "Mark" being more prominent and the last name "Kumagai" following in a similar style.

Mark Kumagai
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