U.S. CONSUMER PRODUCT SAFETY COMMISSION
ROCKVILLE, MARYLAND 20850

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Paul E. Lloret
Project Manager for STP 0217
Underwriters Laboratories Inc.
333 Pfingsten Road
Northbrook, IL 60062

Re: Request for Comments on the Proposed Requirements: 1. New Cooking Nuisance, Polyurethane Flaming and Smoldering Test for the *Standard for Single and Multiple Station Smoke Alarms*, UL 217

Dear Mr. Lloret:

This letter presents comments from U.S. Consumer Product Safety Commission ("CPSC") staff on proposed new requirements for UL 217, *Single and Multiple Station Smoke Alarms*.[1] The staff believes the new proposal would improve the responsiveness of smoke alarms to fires, while providing a new requirement against nuisance alarms from cooking aerosols not associated with fires.

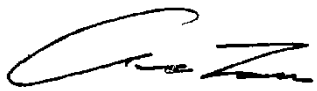
CPSC staff fully supports this proposal because it incorporates an obscuration threshold that would significantly improve the performance of smoke alarms for flaming and smoldering polyurethane ("PU") foam fires, thus notifying occupants earlier of the presence of various types of smoke particles and therefore providing a higher likelihood of escaping. CPSC staff is encouraged that the proposals seek to improve the performance of all smoke alarms, so that they can more effectively alert consumers during smoldering and flaming scenarios.

CPSC staff fully supports cooking nuisance performance tests for smoke alarms. Currently, UL 217 does not have any performance tests that represent cooking aerosols that could potentially cause nuisance alarms (*i.e.*, an alarm when no fire is pending). Incorporating a performance test into UL 217 to require smoke alarms be more resistant to cooking aerosols should reduce the number of smoke alarms purposely-disabled due to a nuisance alarm.

[1] The views expressed in this letter are those of the CPSC staff, and they have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

Thank you for the opportunity to make these comments. We look forward to participating in additional discussions on modifying UL 217 to improve smoke alarm sensitivity to early fire indicators and resistance to alarming in nuisance scenarios.

Sincerely,



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