



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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June 9, 2014

Mr. Kenneth Boyce
UL 4200A Project Manager
Underwriters Laboratories Inc.
333 Pfingsten Road
Northbrook, IL 60062-2096

Re: Request for Comments on Proposed First Edition of the Standard for Safety for Products
Incorporating Button Cell Batteries of Lithium or Similar Technologies, UL 4200A

Dear Mr. Boyce:

U.S. Consumer Product Safety Commission (CPSC) staff appreciates this opportunity to provide comments on the proposed standard for products that incorporate button/coin cell batteries.¹ CPSC staff strongly supports the UL 4200A Standards Technical Panel's effort to address hazards associated with battery ingestion by children. Staff views the earliest possible integration of these proposed design features into products as an important step. We believe that the necessity to use tools or dual-action mechanisms to open battery compartment access doors will significantly decrease the exposure of children to hazardous batteries.

Regarding the warning in section 7.2 and 8.2, CPSC staff notes that the signal word "WARNING" should be preceded by the safety alert icon, , as recommended by ANSI Z535.4, *American National Standard for Product Safety Signs and Labels*. The inclusion of the safety alert symbol is also consistent with *UL 60065, Standard for Audio, Video, and Similar Electronic Apparatus – Safety Requirements, Annex 1 DU (normative), Safety requirements for coin/button cell batteries*.

Again, thank you for proposing this important standard. If you have any questions, or need additional information, please feel free to contact me.

Sincerely,

Douglas Lee

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

cc: Colin Church, CPSC Voluntary Standards Coordinator