



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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Patricia Sena
Project Manager, STP 0943 Ground-Fault Circuit-Interrupters
333 Pfingsten Road
Northbrook, IL 60062

Dear Ms. Sena,

I am writing to comment on the proposal of May 28, 2021, from Mr. Ray Borrego of Helen of Troy to make requirements in UL 943B – *Appliance Leakage-Current Interrupters* for the auto-monitoring function for ALCIs optional. Although Consumer Product Safety Commission (CPSC or Commission) staff is concerned about the reliability issues raised by Mr. Borrego regarding self-monitoring ALCIs, staff does not support making these requirements optional. The views or opinions expressed in this letter are solely those of the staff, and these views do not necessarily represent those of the Commission.

Staff ardently supported requirements for immersion protection for personnel for handheld hair-drying appliances as a critical means of preventing electrocutions even before those requirements were initially incorporated into UL 859 – *Household Electric Personal Grooming Appliances* in the 1990s. Moreover, in 2010, the Commission underscored the importance of these requirements by adding handheld hair dryers to the list of products under Section 15(j) of the Consumer Product Safety Act (CPSA), automatically deeming a hand-supported hair-dryers without immersion protection in compliance with relevant UL standards to be a substantial product hazard (16 CFR sec. 1120.3(a)). Despite the proliferation of installed ground-fault circuit-interrupter (GFCI) protection for receptacle outlets in bathrooms, CPSC staff still believes that the integral protection in the hair dryer is essential. Additionally, despite this redundant protection, paragraph 422.41 of the 2020 Edition of the National Electrical Code continues to require hair dryers to include immersion protection.

Moreover, CPSC staff was integrally involved in the discussions incorporating auto-monitoring requirements for GFCIs and ALCIs into UL 943 and UL 943B, recognizing that components critical to the essential function of these devices fail and that consumers may not regularly test them manually. These capabilities work to ensure that the user will become aware that an immersion-protection device that becomes nonfunctional no longer offers protection.

Alternatively, to address the concerns raised by Mr. Borrego, staff would not oppose a temporary stay of enforcement of the auto-monitoring requirements by certification laboratories, nor would we oppose any similar action to give UL an opportunity to investigate the reliability concerns noted in the proposal. This would allow UL to determine whether the issue is widespread and to make any necessary adjustments. Staff believes that the auto-monitoring feature should only enhance the safety of hair dryers.

We appreciate the opportunity to present our position on this matter. CPSC staff strongly affirms that the auto-monitoring requirements in UL 943B should remain mandatory for ALCIs to help ensure that this critical, life-saving feature is functional. However, it is equally important to resolve the concerns of reliable and safe operation, as detailed in the proposal. Please let us know if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Douglas Lee". The signature is written in a cursive, flowing style.

Douglas Lee
Electrical Program Area Risk Manager
Risk Management Group

Cc: Randi Myers, UL 943 STP Chair; Jacqueline Campbell, CPSC Voluntary Standards Coordinator