

Thank you for the opportunity for UL to comment on the latest draft of the Power Supply Specification.

UL values the inclusion of Section 4A to the draft document and the promotion of safety that this section brings to the specification. Of course, safety certifications have been UL's core business for well over 100 years and we are proud to be recognized for this work. If Section 4A was added to "ensure...safety is never compromised," then we are in support of the reference to safety standards and UL's services in this area. We should note that the UL Mark on a product does not mean that the product has not had any construction changes over the lifetime of its manufacture, nor does the UL Mark equate to a level of energy efficiency. The UL Mark is a manufacturer's declaration that the product complied with the safety requirements at the time of manufacture.

We noted that the UL Standards for Class 2 (UL1310) and non-Class 2 (UL1012) were specifically mentioned in the draft. These are the key UL standards for the type of power supply covered by the draft specification. However, this type of power supply can also be evaluated by UL to several end-product standards such as Audio/Video Apparatus (UL 60065) or Information Technology Equipment (UL 60950). Many possibilities exist here as the power supplies are specifically evaluated to the intended use, conditions and environment. Further, the edition dates of the standards change as requirements are upgraded. In short, the inclusion of specific standards and dates may be desirable, but difficult to maintain.

In Section 4E, we noted that partners of Energy Star are "required to self-certify." While this is probably not the intent, this statement may be construed by manufacturers to mean that they must conduct the Energy Star evaluations within their company. We trust that the EPA would accept data supplied from UL as an independent and unbiased third party. In this regard, we would like to see Section 4E revised to accept data supplied by a qualified third-party test laboratory such as UL.

Once again, thank you for providing us with a copy of the Third Draft. If you, or the EPA staff, have any questions about our comments, please do not hesitate to write or call.

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