



Government Affairs  
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September 24, 2007

Ms. Peggy L. Jenkins  
California Air Resources Board  
Research Division, Fifth Floor  
1001 I Street, P.O. Box 2815  
Sacramento, CA 95814

Dear Ms. Jenkins,

Underwriters Laboratories Inc. (UL) would like to comment on the Proposed Regulation Order – Regulation for Limiting Ozone Emissions From Indoor Air Cleaning Devices. UL's comments address two issues we would like the California Air Resources Board (ARB) to consider prior to final publication of the regulation.

UL is concerned with the signature requirements of the Indoor Air Cleaning Device Certification Application ("Appendix D"). Within our organization, the project reviewer is the staff responsible for determining compliance with applicable requirements and for authorization to use the UL Mark. Laboratory technicians are not authorized to determine if an air cleaning device complies with the electrical safety requirements of ANSI/UL standards. UL recommends modification of Appendix D to include the signature of those individuals or job titles responsible for determining compliance with regulatory requirements.

UL would also like to express concern about the timeline for implementation of these regulatory requirements. We are currently working to establish a new service offering, testing products to these requirements, but with many variables still outstanding, we anticipate not having a program ready until September 2008. Recognizing that certification bodies do not currently have a program or infrastructure in place to certify products to these new regulatory requirements, UL believes that a January 2009 effective date may pose a market barrier for products being sold in the state of California.

We thank you for your consideration of these comments. Please feel free to contact us should you have any questions or require any additional information.

Sincerely,

A handwritten signature in black ink that reads 'Claire A. Kammer'.

Claire A. Kammer  
Manager, Government Affairs

