

Mr. Chirdon:

Underwriters Laboratories Inc. (UL) provides the following response to the Federal Register Notice dated December 1, 2003 inviting comments on MSHA's intent to review IEC 60079-0, IEC 60079-1 and IEC 60079-11 for equivalency (with modifications as necessary) to the applicable MSHA product requirements.

UL is an independent, not-for-profit, private-sector organization involved in global safety standards development, and product safety testing and certification, in the field of hazardous locations / explosive atmospheres equipment for over 80 years. UL's knowledge in the development of standards for safety, along with the application of these standards as part of product safety testing and certification, are a critical part of the architecture of the U.S. product safety system.

UL supports MSHA's intent to review IEC 60079-0, IEC 60079-1 and IEC 60079-11 for equivalency to the applicable MSHA product requirements. Should this equivalency determination be successful, it would maintain the necessary level of safety while at the same time serving to strengthen the U.S. gassy underground mine industry's ability to compete globally. Specifically, the industry would be able to more effectively participate in international conformity assessment programs such as the IECEX Scheme, and regional conformity assessment programs such as the European ATEX Directive.

Regarding other product safety standards for future equivalency consideration, UL respectfully submits the following:

1. ANSI/UL 913: Intrinsically Safe Apparatus and Associated Apparatus for Use in Class I, II, and III, Division 1, Hazardous (Classified) Locations
2. ANSI/UL 1203: Explosion-Proof and Dust-Ignition-Proof Electrical Equipment for Use in Hazardous (Classified) Locations
3. ANSI/UL 60079-0: Electrical Apparatus for Explosive Gas Atmospheres - Part 0: General Requirements
4. ANSI/UL 60079-1: Electrical Apparatus for Explosive Gas Atmospheres - Part 1: Flameproof Enclosures "d"
5. ANSI/UL 60079-11: Electrical Apparatus for Explosive Gas Atmospheres - Part 11: Intrinsic Safety "i"
6. ANSI/UL 783: Electric Flashlights and Lanterns for Use in Hazardous (Classified) Locations
7. ANSI/UL 844: Electric Lighting Fixtures for Use in Hazardous (Classified) Locations
8. ANSI/UL 674: Electric Motors and Generators for Use in Division 1 Hazardous (Classified) Location

Standards and their proper application play a critical role in the development, implementation, and maintenance for a safer workplace. The proven knowledge, skills and abilities of MSHA -- in conjunction with a forum such as this for broad public input - serves industry well.

If you have any question or would like to discuss our comments further, please contact us.

Sincerely,

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