



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
WASHINGTON, DC 20207

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Mr. Steven Dinowitz  
Secretary for STP 1042

Re: Request for Comments on the Proposed Requirements for the Fourth Edition of the  
Standard for Electric Baseboard Heating Equipment, UL 1042

Dear Mr. Dinowitz:

This letter presents comments from the U.S. Consumer Product Safety Commission (CPSC) staff regarding proposed changes to UL 1042, *Electric Baseboard Heating Equipment*. The comments have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission. The CPSC staff agrees with the proposed rewording of Section 1.4 of UL 1042. A heater intended to be placed with its back as near as possible to a wall should be expected to be exposed to nearby combustible materials, such as drapery and wallpaper. Controlling the maximum temperature rise of the heater's exterior surfaces during use is an important means to reduce the risk of fire in such a setting.

The CPSC staff believes that no radiant heater, irrespective of its dimensions, should be categorized as a baseboard heater. Radiant heaters are not air-heating appliances. UL 1042 assumes a device that creates warmed air as its heat transfer mechanism. The exception in Section 1.4 b of UL 1042 should explicitly state that no radiant heater shall be evaluated as a baseboard heater. Radiant heaters should comply with the requirements in the standards UL 1278 *Movable and Wall- or Ceiling-Hung Electric Room Heaters*, or UL 2021 *Fixed and Location-Dedicated Electric Room Heaters*.

Thank you for the opportunity to make these comments.

Sincerely,

Randy Butturini  
Directorate for Engineering Sciences