

Subject 1017

333 Pfingsten Road
Northbrook, IL 60062
November 18, 2005

TO: Standards Technical Panel (STP) for Vacuum Cleaners, Blower Cleaners, and Household Floor Finishing Machines, STP 1017;
Subscribers to UL's Standards Service for Vacuum Cleaners, Blower Cleaners, and Household Floor Finishing Machines, Other Interested Parties

SUBJECT: Comments and Substantive Changes received on the ANSI Ballot of Proposed Requirements for the Seventh Edition of the Standard for Vacuum Cleaners, Blower Cleaners, and Household Floor Finishing Machines, UL 1017;

SUMMARY OF TOPICS

This bulletin proposes the following changes in requirements:

- 1. Additional clarifications of requirements for polymeric parts handling fluids.*
- 2. Editorial clarifications to Table 3, Polarity identification of flexible cords.*

COMMENTS DUE: December 19, 2005

The attached comment matrix provides the comment dispositions for the comments received on the comment matrix dated April 9, 2004. The comments were due to the Project Manager by May 10, 2004. The matrix contains all of the comments that were received. The effective dates are the same as stated in the proposal bulletin dated August 2, 2002.

UL has determined that consensus has been achieved regarding the ANSI approval of the proposed revisions to UL 1017. The initial consensus count is as follows:

Topic	Yes	No	Abstain / No without comment
1	11	1	0
2	11	0	1
3	12	0	0
4	12	0	0
5	12	0	0
6	12	0	0
7	12	0	0
8	12	0	0
9	12	0	0

If you wish to change your vote in light of the dispositions/actions or the proposed changes, please respond to us in writing by **December 19, 2005**. If we do not hear from you by this date, your original vote will be maintained.

If the STP concurs with the dispositions/actions, UL plans to adopt the revised version of UL 1017 as an ANSI standard.

Anyone who has submitted an objection has the right to appeal this action on a procedural basis through UL's Appeals Process. If you wish to appeal, please respond by **December 12, 2005**. Please note only appeals based on procedural issues will be heard, technical issues should be resolved at the consensus body level. Guidelines on how to register an appeal can be obtained at <http://ulstandardsinfolnet.ul.com> or by contacting the STP Project Manager.

UL appreciates the time and effort you have put forth to review this standard, and look forward to your continued participation in this UL/ANSI standard activity.

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APPENDIX A**COMMENT MATRIX**

The table below provides the comment dispositions from the comments received on the comment matrix dated April 9, 2004.

The Standard for Vacuum Cleaners, Blower Cleaners, and Household Floor Finishing Machines

The rows in the comment resolution matrix can be defined as follows:

Commenter	Name of person who submitted comment.
Paragraph / Text Reference	Indicates the specific reference for the comment.
Comment	This comment matrix presents the verbatim text of the comment.
Suggested Revision By Commenter	The proposed revision corresponding to the comment received.
Response	Rationale of the action/disposition after reviewing the comment.
Action/Disposition	The recommended decision to the comment.

Topic 1 – Parts handling fluids	
Commenter	Daniel Koltak
Paragraph / Text Reference	Reference to the comment made by Myrl Monroe about bare floor cleaning solutions. See the April 9, 2004 Comment Matrix, page 3.
Comment	The UL response is simply incorrect and can be proven by basic Chemical compatibility testing. Non-Ionic Surfactants used in many carpet cleaning formulations, employed for the purpose of breaking down oily stains, can be detrimental to Thermoplastics normally used in the manufacture of Carpet cleaning machines. These same Non- ionic surfactants do not damage carpeting. Suggestion – Add a Chemist familiar with Bare Floor & Carpet cleaning chemistry to your STP 1017 panel. There are many Associations such as ASTM – Soap & Detergent Association etc. that would be happy to suggest some methods to test for detrimental effects of chemicals on Polymeric materials.
Suggested Revision By Commenter	No specific revision suggested.
Response	UL agrees with the comment that the proprietary fluid requirements should be applied to household use self-contained carpet cleaning machines. However, this topic was discussed at the binational task group meeting on October 21, 2004, and the consensus of the group was to proceed with the proposal at this time without revising the scope to include household use self-contained carpet cleaning machines. UL has requested industry members on the task group to provide supporting information as to why the proprietary fluid requirements should not be applied to household use self-contained carpet cleaning machines. The intention of the task group is to continue discussion on this topic at a future binational task group meeting. Regarding the addition of a chemist to the STP, input from various areas of expertise is always welcomed. However, it is not necessary to seek a chemist as a permanent STP member for the purpose of soliciting input on a single proposal topic.
Action/Disposition	No proposed revisions at this time.

Table Continued

Topic 1 – Parts handling fluids	
Commenter	Daniel Koltak
Paragraph / Text Reference	Reference to the comment made by Myrl Monroe about any fluid handling machine. See the April 9, 2004 Comment Matrix, page 4.
Comment	The UL response does not answer the concern. It is true that Water in itself is not detrimental on most Polymeric materials – but – for some portion of the fluid handling system the cleaning solution is mixed with the water to expose those polymeric fluid handling components to a solution consisting of Carpet cleaning or Bare floor cleaning solution & water to varying degrees of mix percentages. Suggestion – If the intent of the Tests is really to verify that if a chemical is used in a cleaning solution – that it will not damage the plastic component parts used in the appliance – Should it not be the object of this exercise to address all concerns? The underlying concern, whether a Bare Floor cleaning Chemical or a Carpet Cleaning Chemical is used, should be that if a Polymeric Fluid Handling component leak and the conductive solution ingress into an area of live parts – then progress to create a conductive path – accessible to the user.
Suggested Revision By Commenter	No specific revision suggested.
Response	UL agrees with the comment that the proprietary fluid requirements should be applied to household use self-contained carpet cleaning machines. However, this topic was discussed at the binational task group meeting on October 21, 2004, and the consensus of the group was to proceed with the proposal at this time without revising the scope to include household use self-contained carpet cleaning machines. UL has requested industry members on the task group to provide supporting information as to why the proprietary fluid requirements should not be applied to household use self-contained carpet cleaning machines. The intention of the task group is to continue discussion on this topic at a future binational task group meeting.
Action/Disposition	No proposed revisions at this time.
Commenter	Daniel Koltak
Paragraph / Text Reference	Reference to the comment made by John Schen – exception No. 1 clause 5.12.8.1.1. See the April 9, 2004 Comment Matrix, page 5.
Comment	The Response is not acceptable because there are simple tests that could be added to the standard to prove "harshness" of chemicals. The UL statement that carpet cleaning chemicals will not damage polymeric materials is incorrect. Suggestion – Consider the addition of chemical compatibility testing & consideration of all the Facts with regard to Carpet Cleaning chemicals.
Suggested Revision By Commenter	No specific revision suggested.
Response	This topic was discussed at the binational task group meeting on October 21, 2004. The task group did not support developing a chemical compatibility test at this time.
Action/Disposition	No proposed revisions.
Commenter	Daniel Koltak
Paragraph / Text Reference	Reference to the comment made by Myrl Monroe – How to test the components of the fluid handling system. See the April 9, 2004 Comment Matrix, pages 6 and 7.

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Table Continued on Next Page



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Topic 1 – Parts handling fluids	
Comment	There are situations where testing sub assemblies could result in the assumption of failure. The scenario is that the sub – assembly would leak. But it would leak so as NOT to cause wetting of live parts. Additionally – How would one Test Di-electric & Current Leakage requirement (5.12.2.1) of a mechanical sub assembly on a stand alone basis if there was no re-assembly ? Suggested changes – It should be made optional to test per prescribed methods only the Polymeric fluid handling components and reassemble them to prove that they do not leak and /or violate additional electrical testing called out in 5.12.2.1.
Suggested Revision By Commenter	None.
Response	Accepted in part. Proposal revised for clarification.
Action/Disposition	Proposed revisions. See Appendix B, Topic 1.
Commenter	Daniel Koltak
Paragraph / Text Reference	5.12.8.2.4
Comment	It appears this clause only considers electrically driven pumps. The response in the comment matrix included exception statements about “brushes wearing out” - “replacing brushes” but does not include any statements of exception about MECHANICAL pumps nor does it contain any statements of acceptance criteria pertaining to same. Additionally, with regard to the statement “ If the pump ceases to operate after 25 hours, but before the completion of 30 days, the test shall be considered complete.” We are unsure as to how to interpret this statement? Suggestion – Further discussion and clarification of conditioning and what the Pass/ Fail criteria should be.
Suggested Revision By Commenter	No specific revision suggested.
Response	The clause covers all electrical pumps, including the type that drives a belt. Clause 5.12.8.2.5 requires all pumps to be operated for 30 days and specifically makes only one exception for a pump motor employing brushes. The exception takes into account brushes wearing out and allows brushes to be replaced during testing, if the pump ceases to operate in 25 hours or less. If the pump ceases to operate after 25 hours, but before the completion of the 30 days, the test shall be considered complete. For clarification, UL proposes to separate the exception and provide as a separate clause.
Action/Disposition	Proposed revisions. See Appendix B, Topic 1.
Commenter	Ramona Saar
Paragraph / Text Reference	UL's response to comment made by Myrl Monroe about the Rationale in the April 9, 2004 Comment Matrix, see page 3.
Comment	AHAM does not agree with the UL Response. Non-ionic surfactants used in many carpet cleaning formulations for the purpose of breaking down oily stains might not damage carpeting but may be detrimental to thermoplastics normally used in the manufacture of carpet cleaning machines. AHAM recommends that a chemist who has an understanding of the detrimental effects of chemicals be added to STP 1017.
Suggested Revision By Commenter	None.