

Rachel,

Let me first comment that you did a very good with the meeting in Atlanta.

Underwriters Laboratories Inc. has done extensive work with regards to developing marking requirements for appliances. The marking requirements in the UL Standard for these products are familiar to all of the manufacturers, consultants, bottlers, and other users of this Listing service within the industry. While the content of wording from the UL Standard Marking section would not apply for this application, you may get some ideas from some of the text. I have attached some wording that may assist you with developing Marking Requirements for this draft document. The wording comes from ANSI/UL 541:

## **MARKING**

### **62 General**

62.1 Unless otherwise specifically indicated, every marking specified in this standard shall be permanent.

62.2 A marking that is required to be permanent shall be molded, die-stamped, paint-stenciled, stamped or etched metal that is permanently secured or indelibly stamped on pressure sensitive labels secured by adhesive that, upon investigation, (see Label Adhesion Tests, Section 58), is found to be acceptable for the application. Ordinary usage, handling and storage of the vender is to be considered in the determination of the permanence of the marking.

62.3 A marking that is required to be permanent shall be located on a part:

- a) That would require tools for removal, or
- b) That cannot be removed without impairing the operation of the vender.

62.14 Each vender shall be marked on or near the vender nameplate with the date of manufacture, which may be in code.

63.15 Except as indicated in 63.16, the electrical information shall be on a nameplate or plates located on the outside of the front of the vender. The nameplate shall be so constructed and fastened as to form a permanent part of the assembly.

63.16 The nameplate(s) may be located on the outside of the rear or side of the vender near the power supply entry if the complete marking is repeated inside the front access or service door.

.....The marking shall be visible during installation of the vender and also exposed for inspection after the unit has been installed.

One item to for consideration as you prepare to address "retrofit strategies" is that modification to the construction of a UL Listed

appliance may result in nullifying the UL Listing Mark for that product.

If I can help you with any questions regarding these comments, or if you would like to discuss any ideas you have regarding going forward with the next actions, please feel free to contact me by any of the means below.

Best regards,

Robert J. Roberson  
Underwriters Laboratory Inc.