



March 30, 2018

Greg Wischstadt, President, Board of Directors
Greg Marchand, Chair, Technical Committee
Portable Generator Manufacturers' Association
1300 Sumner Avenue
Cleveland, OH 44115-2851

Dear Mr. Wischstadt and Mr. Marchand:

Consumer Reports, an independent, nonprofit organization that works side by side with consumers for truth, transparency, and fairness in the marketplace, writes to follow up on our December 14, 2017, letter regarding the draft revised voluntary standard proposed by the Portable Generator Manufacturers' Association (PGMA) for recognition by the American National Standards Institute (ANSI).¹ We reiterate our request for PGMA to take the actions recommended in that letter.

In particular, we once again urge PGMA to share data that supports its effectiveness claims, specifically those related to its proposed ambient carbon monoxide concentration limits, at which portable generators would shut off automatically.² PGMA has indicated, according to the results of manufacturer assessments, that the relevant provisions in the draft standard would provide 99.9% effectiveness in averting fatalities, as measured under the same criteria used by the 2016 notice of proposed rulemaking for a portable generators safety standard.³ While this claim is encouraging, we still have not been provided the access to data necessary to facilitate an independent evaluation of the claimed effectiveness, even after our previous letter. PGMA should make this data available so that stakeholders and independent experts can determine whether the proposed limits would adequately protect consumers.

We also write to clarify our request for PGMA to commit to robustly monitor the standard's effectiveness. In so doing, we urge PGMA to review the standard for necessary updates not more than 12 months after its effective date.

Thank you for your prompt consideration. We look forward to your reply.

Sincerely,

Mark Connelly
Senior Director, Product Testing
Consumer Reports⁴

David Friedman
Director, Cars and Product
Policy and Analysis
Consumers Union⁵

Don Huber
Director, Product Safety
Consumer Reports

John Galeotafiore
Associate Director,
Home Improvement
Consumer Reports

William Wallace
Senior Policy Analyst
Consumers Union

Jack Barnett
Policy Research Assistant
Consumers Union

cc: *ANSI Procedures and Standards Administration department*

Members of the Portable Generator Manufacturers' Association: A-iPower Corp., American Honda Motor Co., Briggs & Stratton Corporation, Champion Power Equipment, Generac Power Systems, GenTent Safety Canopies, Wacker Neuson Production Americas, and Yamaha Motor Corp.

Portable Generator Manufacturers' Association staff: Ms. Susan Orenge, Executive Director; Mr. Joseph Harding, Technical Director

[1] Consumer Reports, "Letter on the proposed Portable Generator Manufacturers' Association voluntary standard" (Dec. 14, 2017) (online at: consumersunion.org/wp-content/uploads/2017/12/CR-letter-and-comments-to-PGMA-accompanying-G300-ballot-12-14-2017.pdf).

[2] Generally, BSR/PGMA G300-201x (Dec. 20, 2017) at 3.9 and 6.2.11.

[3] PGMA, "Rationale for Proposed Revisions to PGMA G300 to Address CO Safety" (Oct. 26, 2017); 81 Fed. Reg. 83556. PGMA also has stated publicly, "All data sources predict that auto-shutdown will result in a significant reduction in fatalities and injuries related to the misuse of the product by stopping the source of the carbon monoxide." PGMA press release (Oct. 26, 2017) (online at www.pgmaonline.com/pdf/PGMAUpdateReleaseFinal102617.pdf).

[4] Founded in 1936, Consumer Reports has the largest nonprofit educational and consumer product testing center in the world, and uses its dozens of labs, auto test center, and survey research center to rate thousands of products and services annually. CR's premier magazine *Consumer Reports* has more than 3.6 million subscribers, and the award-winning CR.org has 2.9 million paying members and more than 15 million unique visitors monthly, on average.

[5] Consumers Union is the advocacy division of Consumer Reports.