



POLICY & ACTION FROM CONSUMER REPORTS

August 1, 2018

Office of Management and Budget
Office of Information and Regulatory Affairs
Attn: OMB Desk Officer for the CPSC
725 17th Street NW, Room 10235
Washington, DC 20503

Submitted to OIRA_submission@omb.eop.gov and via www.regulations.gov

**Comments of Consumers Union to the Office of Management and Budget on
Agency Information Collection Activities; Submission for OMB Review;
CPSC Comment Request - Survey on Smoke and Carbon Monoxide Alarms
Docket No. CPSC-2018-0005**

Consumers Union, the advocacy division of Consumer Reports (CR),¹ welcomes the opportunity to submit comments to the Office of Management and Budget (OMB) in reference to the proposed U.S. Consumer Product Safety Commission (CPSC) survey regarding smoke and carbon monoxide detectors. We strongly support the CPSC's intention to conduct an updated national survey on this subject, so that it can better understand how consumers interact with these detectors and can help further reduce deaths and injuries from fires and carbon monoxide poisoning in the home.

According to the National Fire Protection Association, working smoke detectors increase the chance of surviving a fire by 50%, and between 2009 and 2013, fires in homes with no smoke detectors caused an average of 940 deaths per year (38% of home fire deaths). An additional 510 people per year (21% of home fire deaths) were fatally injured in fires in which smoke alarms were present but failed to operate.² According to the Centers for Disease Control and Prevention (CDC), during 2010–2015, a total of 2,244 deaths resulted from unintentional

¹ Consumer Reports is an independent, nonprofit member organization that works side by side with consumers for truth, transparency, and fairness in the marketplace. 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.

² National Fire Protection Association, Smoke Alarms in U.S. Home Fires (online at: www.nfpa.org/news-and-research/fire-statistics-and-reports/fire-statistics/fire-safety-equipment/smoke-alarms-in-us-home-fires).

carbon monoxide (CO) poisoning, with 393 of those deaths occurring in 2015.³ These harrowing statistics highlight the importance of understanding the factors associated with proper installation and maintenance of smoke and carbon monoxide detectors.

CR often stresses to consumers that installing and maintaining smoke and CO alarms is critically important. The most recent CR buying guide and ratings on these detectors offer consumers comparative information about different products that we independently tested. As a part of this buying guide—to help keep consumers safe—CR shared information about how consumers can help ensure that smoke and carbon monoxide detectors function properly.⁴ We are especially appreciative of those proposed elements of the survey that seek to provide the CPSC a better understanding of how consumers interact with these potentially life-saving devices.

In March 2017, Consumer Reports testing revealed that three carbon monoxide detectors that were being sold on Amazon and eBay did not function properly. We also noticed that they did not carry certification to the voluntary standard, UL 2034, which specifies a range of appropriate detector response times at various concentrations of CO in the air. CR alerted consumers by rating the products as “Don’t Buy: Safety Risk,” after which Amazon told CR that the models we tested had been removed from its website, as had similar models we pointed out. The fact that these faulty detectors were being sold to unsuspecting consumers demonstrates the need to closely monitor the market to promote safety.

We especially support several planned updates to the survey, as they would provide particularly useful information to the CPSC and the public. CR has long supported detectors that are able to sense both fast-flaming and smoldering fires. For this reason, we appreciate the agency’s intention to have field interviewers observe whether consumers’ detectors have a single sensor or are dual-sensor (with ionization and photoelectric sensors). We are also pleased that interviewers would observe whether consumers’ systems are interconnected, which would help determine if a detector in a kitchen, for example, would cause a bedroom alarm to go off to alert consumers of a fire or an accumulation of carbon monoxide in another part of a house. Of course, CR also supports many components of the original survey that are being carried over to the update, including asking consumers how often they check their detectors and why these devices may be turned off or disconnected, as well as having field interviewers record whether detectors rely on a single power source or utilize AC power in conjunction with battery backups.⁵

In addition to the questions that CPSC already intends to ask, we urge that CPSC also include questions regarding whether consumers’ smoke and carbon monoxide detectors interact with their smartphones, tablets, or other electronic devices connected to the internet. As long as

³ CDC, Quick Stats: Number of Deaths Resulting from Unintentional Carbon Monoxide Poisoning (online at: www.cdc.gov/mmwr/volumes/66/wr/mm6608a9.htm).

⁴ Consumer Reports, “Check Smoke and Carbon Monoxide Detectors When Moving Into a New Home” (Mar. 9, 2018) (online at: www.consumerreports.org/smoke-carbon-monoxide-detectors/check-smoke-and-carbon-monoxide-detectors/).

⁵ CPSC, “Smoke Detector Operability Survey Report on Findings” (Oct. 1994) (online at: www.cpsc.gov/s3fs-public/operable.pt1.pdf).

they are sufficiently protected from being compromised, we see great promise in detectors with smart capabilities, and think it would be beneficial for the agency to learn about consumers' experiences with these devices, both in the marketplace and in their homes.

Thank you for your consideration of our comments.

Respectfully submitted,

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