



National Electrical Manufacturers Association

July 31, 2019

Joel Solis
Secretary-General, CANENA
c/o National Electrical Manufacturers Association
1300 N. 17th Street, Suite 900
Rosslyn VA 22209
Email: joel_solis@nema.org

Subject: Proposed CANENA Trinational Project Request for AFCIs

Dear CANENA Secretary-General:

The scope of the proposed project request originally submitted by Electro-Federation Canada concerns electrotechnical requirements found in UL 1699, *Standard for Arc-Fault Circuit Interrupters*, UL 1699A, *Outlet Branch Circuit Arc Fault Circuit Interrupters*, and CSA C22.2 No. 270, *Standard for Arc Fault Protective Devices*.

The approval process for a CANENA project requires endorsement and commitment of participation by the relevant national Standards Development Organizations in each participating country, supported by in-country industry commitment. Because there is no consensus for harmonization among NEMA Members, NEMA is unable to proceed with U.S. industry support for a CANENA harmonization project.

There are two outstanding issues upon which NEMA Members could not achieve agreement related to the U.S. Standard development and approval process.

First, CSA has consolidated all AFCI requirements into one Standard while UL has two Standards covering the same material. NEMA has conducted an inquiry with its Members and concluded there is no agreement to support a one- or two-Standard approach. Some Members insist on one Standard, while others feel strongly that two Standards should be created.

Second, on the question of using a single UL consensus body for the two types of products, NEMA Members hold conflicting views. Circuit breaker AFCI manufacturers would like a single Standards Technical Panel (STP), while receptacle AFCI manufacturers would like two separate STPs.

For these reasons, NEMA is unable to proceed with U.S. industry support for this CANENA harmonization project and our Members have directed us to inform CANENA accordingly.

Respectfully,

Suzanne Alfano
Industry Director
NEMA Low-Voltage Distribution Equipment (5LVDE) Section

Daniel Abbate
Industry Director
NEMA Wiring Device (5WD) Section

CC: Luis Ivan Hernandez (ANCE), Maria de Jesus Jimenez (ANCE), Julio Rodriguez (CANAME), Michael Wilson (CSA Group), Mark Humphries (CSA Group), Gurvinder Chopra (EFC), Valara Davis (UL Standards), Randi K. Myers (UL STP 1699 Chair), Patricia Sena (UL Standards), Andrei Moldoveanu (NEMA), Zijun Tong (NEMA)