

Anonymous Anonymous

Who is commenting? (*choose the best fit*)

Representative of a product manufacturer(s)

When considering the proposed definition of “product category”, how broadly should the agency group product categories? (*Examples: “vehicles” versus “sedans, SUV’s, vans, trucks, RV’s” or “printers” versus “receipt printers, thermal printers, label printers, residential printers, commercial printers, etc.”*)

We would support more broad product categories to reduce duplicative requests for components that may be used in multiple narrower product categories.

Should each request for a CUU determination be limited to a single product category, or should applicants be allowed to submit a request for a CUU determination for multiple product categories?

We would support applicants being allowed to submit a request for a CUU determination for multiple product categories. This could reduce duplicative requests for cases where a component is used in multiple product categories.

For manufacturers: Administrative cost of requesting a CUU determination (Part 1 of 2). *Please provide your best estimates or rough orders of magnitude (for example “approx. 200 hours”). Precise accounting data is not necessary to answer this question.*

If your company currently possesses information regarding intentionally added PFAS (to the CAS number level) for all components in your product lines, please estimate the number of technical staff hours that were required to establish this baseline.

Not applicable

For manufacturers: Administrative cost of requesting a CUU determination (Part 2 of 2). *Please provide your best estimates or rough orders of magnitude (for example “approx. 200 hours”). Precise accounting data is not necessary to answer this question.*

If your company does not possess information regarding intentionally added PFAS (to the CAS number level) for all components in your product lines, please estimate the number of technical staff hours needed to obtain this data from your Tier 2 or 3 suppliers for a single product line.

Not applicable