

Intertek ETL SEMKO

August 25, 2005

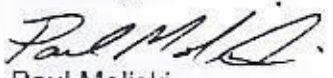
Director
Office of Technical Programs and Coordination Activities
NRTL Program
Occupational Safety and Health Administration
US Department of Labor, Room N-3653
200 Constitution Avenue NW
Washington, DC 20210

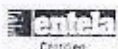
Please accept this letter requesting the renewal of OSHA NRTL recognition for Intertek Testing Services NA Inc. Enclosed you will find the General Application Information. The renewal application fee of \$110 was sent to Office of Financial Management, per the instructions. A copy is attached for your reference.

In question 7 of the General Application form, I have requested changes to the scope of recognition. At this time no Detailed Application Information/Evaluation Criteria is being submitted as this was not viewed as applicable because no major changes have taken place since the most recent application. Intertek has notified OSHA of all personnel changes and the closure or relocation of NRTL recognized sites.

Thank you in advance for processing this request. Please contact me with any questions.

Sincerely,


Paul Moliski
Director of Accreditation
ETL SEMKO Americas



Please provide the following information about the applicant's organization.

1. Legal name of applicant organization

Intertek Testing Services NA, Inc.

2. Street address

165 Main Street
Cortland, NY 13045

Mailing address (if different)

Telephone and fax numbers

Tel: 800-345-3851 Fax: 607-758-9608

E-mail address and website address, if available.

paul.moliski@intertek.com <http://www.intertek-etlsemko.com/>

3. List of owners (with beneficial interests >2%) and percentage of ownership.

ITS NA's parent entity is "Testing Holdings USA Inc.", which is Intertek's holding company in the USA. ITS NA is ultimately owned by Intertek Group plc which is widely traded on the London stock exchange.

4. Name and affiliation of Directors

All Directors of ITS NA are employees of ITS NA. They are Gregg Tiemann, Timothy Courossi and Louis Fiske.

5. Explanation of complete independence [See policy on Independence in Appendix C of Directive]

Intertek Testing Services NA Inc. and its parent company are independent. We maintain no organizational affiliation with suppliers and we are not a major user of products that we certify. No financing is provided to a supplier, we have no product design affiliations or investment in suppliers or major users of products we certify. No supplier or major user of products that an NRTL must certify owns more than two percent of Intertek. No person holding a substantial position with Intertek has a significant financial interest in a supplier or is a director of a product certified by Intertek. Intertek maintains conflict of interest policies and conflict of interest statements are signed by all employees.

6. Name and title of Officers and key staff (and affiliations, if significant)

Officers are Gregg Tiemann, President; Timothy Courossi, Vice President, Treasurer, Secretary and Chief Financial Officer; Louis Fiske, Vice President; Derwyn Reuber, Vice President; Jeff Turcotte, Vice President; Richard Thaler, Asst. Secretary; Jerry Jennings, Asst. Treas.; Ronald Irish, Asst. Treas.

7. All organizational components, including locations and functions, noting individual sites for which accreditation is sought

Intertek has notified OSHA of all organizational changes, acquisitions and the relocation or closure of NRTL sites. During this renewal process, Intertek is requesting following changes to its NRTL Recognition.

- 1) Per the information submitted to OSHA regarding the acquisition of Entela, Inc, we are requesting the NRTL recognition of Entela be consolidated with that of Intertek. At this time, delete the Entela NRTL from the OSHA list and include the Grand Rapids NRTL site in the Intertek scope. The Entela certification mark will also need to be included with the Intertek scope.

The May 29, 2001, Federal Register Notice contained certain Conditions and Limitations on ITS NA's recognition that are no longer appropriate.

- 2) The Compliance Design business is no longer operated by Intertek, so the Additional Condition in the Notice (p29180) should be deleted, as should the reference to Compliance Design under Conditions (p29185).
- 3) Based on ITS NA's quality system improvements, which have been demonstrated during audits over the last few years (with no major findings noted), the Other Limitations (p29185) involving the testing for hazardous location products should be deleted.
- 4) The OSHA website should be revised accordingly to remove the following entries:

Restrictions/Limitation on Recognition Granted:

** Testing and certification of products under this test standard is limited to Class I locations. See also special limitations for hazardous location testing.

Special Limitations/Conditions: ITSNA may perform safety testing for hazardous location products only at the specific ITSNA sites that OSHA has recognized, and that have been pre-qualified by the ITSNA Chief Engineer. In addition, all safety test reports for hazardous location products must undergo a documented review and approval at the Cortland testing facility by a test engineer qualified in hazardous location safety testing, prior to ITSNA's initial or continued authorization of the certifications covered by these reports. The above limitations apply solely to ITSNA's operations as an NRTL.

ITSNA may not test and certify any products for a client that is a manufacturer or vendor, and that is either owned in excess of 2% by ITS Ltd, or affiliated organizationally with ITSNA, including Compliance Design.

8. Primary field of testing

No Change

9. Summary of Proposed Scope of Recognition (sites, standards, & programs)

See Attached List of requested standards. No change to programs. Request for consolidation of the Entela - Grand Rapids NRTL site included in item 7, above.

9. Summary of Proposed Scope of Recognition (sites, standards, & programs)

See Attached List of sites, standards & programs

10. Legal Signatory and alternate contact person(s) (include phone and fax numbers, and email address if different from item #2 above)

Derwyn Reuber
Tel: 905-678-7820 Fax: 905-678-6980
derwyn.reuber@intertek.com

11. Brief history of company and principal line(s) of business

No Change

12. Statement on Terms of Recognition

As legal signatory for Intertek Testing Services NA, Inc., the applicant, I attest that all statements and information contained in our application are correct to the best of my knowledge and are made in good faith. We agree to comply with all the policies, conditions, and requirements for recognition that OSHA imposes through its regulations, directives, and Federal Register notices of recognition. We also agree to operate as an NRTL only within our approved scope of recognition (applicable test standards, sites, & programs), following the policies, procedures, structures, and practices described in our original or amended application accepted by OSHA, or in appropriate revisions we make after recognition. We further agree to promptly submit details to OSHA of any major changes in those operations.

Legal signatory (Type or print Name, then sign and date within the space provided)

Derwyn Reuber - *DR Reuber* August 23, 2005

Proposed Additions to Intertek Scope
2005-08-23

Standard Title	
UL 58	Strut-Type Channel Raceways and Fittings
UL 10A	Tin-Clad Fire Doors
UL 30	Metal Safety Cans
UL 38	Manual Signaling Boxes for Fire Alarm Systems
UL 51	Power-Operated Pumps for Anhydrous Ammonia and LP-Gas
UL 58	Steel Underground Tanks for Flammable and Combustible Liquids
UL 80	Steel Inside Tanks for Oil Burner Fuel
UL 92	Fire Extinguisher and Booster Hose
UL 125	Valves for Anhydrous Ammonia and LP-Gas (Other Than Safety Relief)
UL 132	Safety Relief Valves for Anhydrous Ammonia and LP-Gas
UL 144	Pressure Regulating Valves for LP-Gas
UL 193	Alarm Valves for Fire-Protection Service
UL 194	Gasketed Joints for Ductile-Iron Pipe and Fittings for Fire Protection Service
UL 252	Compressed Gas Regulators
UL 268	Smoke Detectors for Fire Protective Signaling Systems
UL 268A	Smoke Detectors for Duct Application
UL 346	Waterflow Indicators for Fire Protective Signaling Systems
UL 404	Gauges, Indicating Pressure, for Compressed Gas Service
UL 441	Gas Vents
UL 452	Antenna Discharge Units
UL 486D	Insulated Wire Connector Systems for Underground Use or in Damp or Wet Locations
UL 495	Power-Operated Dispensing Devices for LP-Gas
UL 515	Electrical Resistance Heat Tracing for Commercial and Industrial Applications
UL 521	Heat Detectors for Fire Protective Signaling Systems
UL 539	Single and Multiple Station Heat Detectors
UL 555S	Smoke Dampers
UL 568	Nonmetallic Cable Tray Systems
UL 681	Installation and Classification of Burglar and Holdup Alarm Systems
UL 943B	Appliance Leakage-Current Interrupters
UL 985	Household Fire Warning System Units
UL 1053	Ground-Fault Sensing and Relaying Equipment
UL 1058	Halogenated Agent Extinguishing System Units
UL 1062	Unit Substations
UL 1093	Halogenated Agent Fire Extinguishers
UL 1254	Pre-Engineered Dry Chemical Extinguishing Systems Units
UL 1322	Fabricated Scaffold Planks and Stages
UL 1412	Fusing Resistors and Temperature-Limited Resistors for Radio-, and Television-Type Appliances
UL 1468	Direct-Acting Pressure Reducing and Pressure Restricting Valves
UL 1681	Wiring Device Configurations
UL 1730	Smoke Detector Monitors and Accessories for Individual Living Units of Multifamily Residences and Hotel/Motel Rooms
UL 2085	Protected Aboveground Tanks for Flammable and Combustible Liquids
UL 2129	Standard for Safety for Halocarbon Clean Agent Fire Extinguishers
UL 2388	Flexible Lighting Products
UL 60335-2-8	Household and Similar Electric Appliances, Part 2: Particular Requirements for Electric Shavers, Hair Clippers and Similar Appliances
UL 61010A-2-010	Electrical Equipment for Laboratory Use; Part 2: Particular Requirements for Laboratory Equipment for the Heating of Materials
UL 61010A-2-041	Electrical Equipment for Laboratory Use; Part 2: Particular Requirements for Autoclaves Using Steam for the Treatment of Medical Materials for Laboratory Processes
UL 61010A-2-042	Electrical Equipment for Laboratory Use; Part 2: Particular Requirements for Autoclaves and Sterilizers Using Toxic Gas for the Treatment of Medical Materials, and for Laboratory Processes
UL 61010A-2-051	Electrical Equipment for Laboratory Use; Part 2: Particular Requirements for Laboratory Equipment Mixing and Stirring
UL 61010A-2-061	Electrical Equipment for Laboratory Use; Part 2: Particular Requirements for Laboratory Atomic Spectrometers with Thermal Atomization and Ionization
UL 61010B-2-031	Electrical Equipment for Measurement, Control, and Laboratory Use; Part 2: Particular Requirements for Hand-Held Probe Assemblies for Electrical Measurement and Test
UL 61058-1	Switch for Appliances
UL 60947-1	Low-Voltage Switchgear and Controlgear - Part 1: General Rules
UL 60947-4-1	Low-Voltage Switchgear and Controlgear Part 4-1: Contactors and Motor-Starters Electromechanical Contactors and Motor-Starters
UL 60947-7-1	Low-Voltage Switchgear and Controlgear Part 7-1: Ancillary Equipment Terminal Blocks for Copper Conductors
UL 60947-7-2	Low-Voltage Switchgear and Controlgear Part 7-2: Ancillary Equipment Protective Conductor Terminal Blocks for Copper Conductors
UL 60947-7-3	Low-Voltage Switchgear and Controlgear - Part 7-3: Ancillary Equipment - Safety Requirements for Fuse Terminal Blocks