Agency Submittals Made Easy

By Steve Rogers
NRTLs (nationally recognized testing laboratories) offer companies the ability to secure third-party verification of product capabilities. These approvals can also be a wise marketing strategy since they allow products to be compared fairly and completely by potential customers. However, the process can be both costly and lengthy without organization and attention to detail.

While each NRTL (i.e., UL and CSA) has its own disclosure requirements for submittal documents based on product types and standards, there are certain pieces of information that are nearly always required. These include:

• A detailed product description, including all models, variations (alternate materials or designs), and options (add-ons or optional configurations). Every possible iteration of the finished product must be addressed and described.
• Product diagrams and/or schematics
• All applicable product literature, including instruction manuals, safety tips, installation instructions, and data sheets (to demonstrate operating parameters)
• Complete company contact information. Make it easy for the test engineer to find you and avoid wasting expensive time on searching for contact information instead of testing
• A list of all manufacturing locations for the product. These may require on-site inspection if the facilities have never before produced an NRTL-marked product. Also, many laboratories now do on-site follow-up inspections after the product is approved
• Details on any previous product designs. In cases where a previous design was NRTL-approved, all that must be done is to show the preceding design and to explain the differences between the two

Depending on the project, some additional information might be required, including:
• Wiring diagrams, where product wiring is complex or not readily visible
• A list of all components and materials used in the product’s construction

Questions on required information should be addressed directly to the NRTL contact (engineer or customer service representative) prior to submitting the test package. This is important for three reasons: first, any questions broached before the project is underway are usually free; second, it prevents loss of time once the actual project has started; and third, it ensures that the submittal is complete and accurate when the test engineer receives it.

NRTLs generally assign test engineers to broad categories of products and industries. So while a test engineer’s knowledge of the standards governing those segments is second-to-none, he or she may not be an expert in the design, construction, and operation of specific products. Keep this in mind as you build the submittal.

Likewise, develop a keen understanding of both the product and its governing standards in order to deduce the tests that will be required. This way, you can be an informed participant in the process. A test engineer less experienced with the product may review the file and recommend a glut of tests, some of which you may know to be unnecessary. Taking the lead with proven knowledge of the standards can result in a more streamlined test regimen.

Confirm all information needed for the submittal. Then, begin gathering the information when product designs are complete and verified. Starting early is always a good idea, especially when dealing with several different internal departments. Let the parties involved know what will be needed from them, and when. Make sure that the information you receive is complete and understandable. If not, get clarification before including it in the submittal.

Next, evaluate the product. Has pre-testing verified product operation, as far as you can tell, in concert with agency performance, safety, and construction standards? If not, go back to the drawing board until you are as sure as you can be that the product will pass NRTL inspection. It is better to endure additional rounds of development internally than handle the time and cash drains possible when the test engineer discovers product problems. Also, avoid lag time between quoting and starting the project by ensuring that product samples are ready or near availability.

The submittal itself should start with a cover letter (this can typically be sent via e-mail or postal mail) that includes a brief summary of the project, as well as any “piggybacks” — instances in which the NRTL has tested or approved similar constructions or products previously. Any cost or time restrictions to the project should be outlined clearly and succinctly. This letter should be between a paragraph and a page in length, no more than a page if possible.

The remainder of the information is included separately. Order this information in a logical way; for example, with product diagrams and information first, then drilling down into details such as optional constructions or materials.

A test engineer who has never worked with you before gets no background on the company or previous projects with the NRTL. So, every project basically requires starting from scratch with the submittal document. Ultimately, a submittal that is “most likely to succeed” is one that strikes a balance between completeness and length. It is equally important to provide a thorough set of information as it is to not send the test engineer a stack of paper inches thick. The goal should be conciseness.

Last but not least, avoid the use of jargon or abbreviations, even if they are industry-accepted. Again, test engineers are assigned to categories of products, and it is unlikely that he or she will be an expert in all of them. Also, keep extra copies of the submittal on file to facilitate communications with the test engineer once the project is underway.

The NRTL approvals process can be orderly and streamlined when companies make

the effort to provide test engineers with complete and organized information. Take the time to familiarize yourself with the standards and requirements for each NRTL you work with for your products, and you will likely see results faster and with less stress.

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