



American Power Conversion

May 31, 2006



RE: American Power Conversion Corporation
RoHS Certification of Compliance

Dear APC Customer:

APC is committed to providing customers with products that are fully compliant with all regulations, international protocols, and customer standards to which they are subject. The European Union (EU) enacted the RoHS and WEEE directives that are intended to protect the environment and our natural resources. The RoHS directive restricts six chemical substances in certain defined electronic products sold into EU countries and the WEEE directive requires that these products be collected at the end of their lifespan. Please feel free view details of the APC WEEE and RoHS implementation program at the APC web site at: <http://www.apc.com/corporate/environmental.cfm>.

APC considers the Uninterruptible Power Supply (UPSs) products referenced in the following table not to be subject to the WEEE and RoHS Directives because UPSs are a product type not listed in Annex 1a or 1b to the WEEE Directive. This product type is not subject to the marking, reporting and waste management requirements of the WEEE Directive or the RoHS substances restrictions. ORGALIME/GIMELEC/CEMEP have confirmed this interpretation and APC expects the European Commission to confirm the interpretation of these respected trade associations that UPSs are not subject to the RoHS and WEEE directives.

APC is voluntarily manufacturing its UPS products to meet the same overall goal of the RoHS directive. APC is applying exemption 7b, which allows continued use of lead in solder in products for the server, network and telecommunications infrastructure, to the UPS products so marked. Therefore, the referenced UPS products are "RoHS compliant."

As a customer who uses our products as components within your own designs or a purchaser of APC products, you have a vested interest in our compliance with the RoHS and WEEE directives. All of us at APC greatly appreciate your continued interest in our company's products.

Sincerely Yours,

A handwritten signature in black ink, reading 'Raymond P. Lizotte, Jr.', is written over a light blue horizontal line.

Raymond P. Lizotte, Jr.
Product Environmental Compliance Engineer
Environmental Programs Office
APC Design Center

APC's WEEE-ROHS Program is on the Web: <http://www.apc.com/corporate/environmental.cfm>

APC bases its RoHS compliance status knowledge on information provided by third parties and has taken and continues to take reasonable steps to provide representative and accurate information, but may not have conducted destructive testing or chemical analysis on incoming components and materials. Compliance with the RoHS Directive means that the product(s) referred above complies with the requirements of EU Directive 2002/95/EC (RoHS), maximum concentration values (MCVs) per Commission Decision 2005/618/EC and subsequent additions to the list of exempted material use applications.



Attachment 1: Products covered by this declaration.

APC SKU Number	Product Description	Status
SC1000I	APC Smart-UPS SC 1000VA 230V - 2U Rackmount/Tower	UPS, 7b
SC1500I	APC Smart-UPS SC 1500VA 230V - 2U Rackmount/Tower	UPS, 7b
SC250RMI1U	NEW! APC Smart-UPS SC 250VA 230V - 1U Rackmount/Tower	UPS, 7b
SC420I	NEW! APC Smart-UPS SC 420VA 230V	UPS, 7b
SC450RMI1U	NEW! APC Smart-UPS SC 450VA 230V - 1U Rackmount/Tower	UPS, 7b
SC620I	NEW! APC Smart-UPS SC 620VA 230V	UPS, 7b
SU1400R2IBX135	IBM Smart-UPS 1400VA RM 2U 230V Black W/EPO	UPS, 7b
SU1400R2JBX135	IBM Smart-UPS 1400VA RM 2U 100V Black W/EPO	UPS, 7b
SU1400RMXLIB3U	APC Smart-UPS XL 1400VA RM 3U 230V - Black	UPS, 7b
SU2200RMXLI3U	APC Smart-UPS XL 2200VA RM 3U 230V	UPS, 7b
SU3000R3JBX120	APC Smart-UPS 3000VA RM 3U 100V Black	UPS, 7b
SU3000RMINET	APC Smart-UPS 3000VA RM 5U 230V	UPS, 7b
SU3000RMJ3U	APC Smart-UPS 3000VA RM 3U 100V	UPS, 7b
SU3000RMJ3U	APC Smart-UPS 3000VA RM 3U 100V	UPS, 7b
SU3000RMXLI3U	APC Smart-UPS XL 3000VA RM 3U 230V	UPS, 7b
SU5000I	APC Smart-UPS 5000VA 230V	UPS, 7b
SU5000IX033	APC Smart UPS 5000VA 230V Hardwire Input/Output	UPS, 7b
SU5000R5IBX120	APC Smart-UPS 5000VA RM 5U 230V Black	UPS, 7b
SU5000RMI5U	APC Smart-UPS 5000VA RM 5U 230V	UPS, 7b
SU5000RMT5U	APC Smart-UPS 5000VA RM 5U 208V	UPS, 7b
SU5000T	APC Smart-UPS 5000VA 208V	UPS, 7b
SU700J	APC Smart-UPS 700VA 100V	UPS, 7b
SUA1000I	APC Smart-UPS 1000VA USB & Serial 230V	UPS, 7b
SUA1000J	APC Smart-UPS 1000VA USB & Serial 100V	UPS, 7b
SUA1000JB	APC Smart-UPS 1000VA USB & Serial 100V Black	UPS, 7b
SUA1000RMI1U	APC Smart-UPS 1000VA USB & Serial RM 1U 230V	UPS, 7b
SUA1000RMI2U	APC Smart-UPS 1000VA USB & Serial RM 2U 230V	UPS, 7b
SUA1000UXI	APC Smart-UPS XL 1000VA USB & Serial 230V No Battery	UPS, 7b
SUA1000XLI	APC Smart-UPS XL 1000VA USB & Serial 230V	UPS, 7b



Attachment 1 (Continued): Products covered by this declaration.

APC SKU Number	Product Description	Status
SUA1500I	APC Smart-UPS 1500VA USB & Serial 230V	UPS, 7b
SUA1500IX38	APC Smart-UPS 1500VA 230V UL Approved	UPS, 7b
SUA1500J	APC Smart-UPS 1500VA USB & Serial 100V	UPS, 7b
SUA1500JB	APC Smart-UPS 1500VA USB & Serial 100V Black	UPS, 7b
SUA1500R2IX180	APC Smart-UPS 1500VA RM 2U 230V with Web/SNMP Card	UPS, 7b
SUA1500RM2U	APC Smart-UPS 1500VA USB & Serial RM 2U 230V	UPS, 7b
SUA1500RMJ2U	APC Smart-UPS 1500VA USB & Serial RM 2U 100V	UPS, 7b
SUA1500RMJ2UB	APC Smart-UPS 1500VA USB & Serial RM 2U 100V Black	UPS, 7b
SUA1500X93	APC Smart-UPS 1500VA USB 120V Shipboard	UPS, 7b
SUA2200	NEW! APC Smart-UPS 2200VA USB & Serial 120V	UPS, 7b
SUA2200I	APC Smart-UPS 2200VA USB & Serial 230V	UPS, 7b
SUA2200JB	APC Smart-UPS 2200VA USB & Serial 100V Black	UPS, 7b
SUA2200RM2U	APC Smart-UPS 2200VA USB & Serial RM 2U 120V	UPS, 7b
SUA2200RM2U	APC Smart-UPS 2200VA USB & Serial RM 2U 230V	UPS, 7b
SUA2200XLI	APC Smart-UPS XL 2200VA 230V	UPS, 7b
SUA3000I	APC Smart-UPS 3000VA USB & Serial 230V	UPS, 7b
SUA3000JB	NEW! APC Smart-UPS 3000VA USB & Serial 100V Black	UPS, 7b
SUA3000R2IX322	Smart UPS 3000VA RM 2U 230V with IEC 309 P and AP9617	UPS, 7b
SUA3000RM2U	APC Smart-UPS 3000VA USB & Serial RM 2U 230V	UPS, 7b
SUA3000RMJ2UB	NEW! APC Smart-UPS 3000VA 2U RM USB & Serial 100V Black	UPS, 7b
SUA3000RMXLI3U	APC Smart-UPS XL 3000VA RM 3U 230V	UPS, 7b
SUA3000RMXLI5U	APC Smart-UPS XL 3000VA RM 5U 230V	UPS, 7b
SUA3000XLI	APC Smart-UPS XL 3000VA 230V	UPS, 7b
SUA500J	NEW! APC Smart-UPS 500VA USB & Serial 100V Beige	UPS, 7b
SUA500J	NEW! APC Smart-UPS 500VA USB & Serial 100V Beige	UPS, 7b
SUA500JB	NEW! APC Smart-UPS 500VA USB & Serial 100V Black	UPS, 7b
SUA750I	NEW! APC Smart-UPS 750VA USB & Serial 230V	UPS, 7b
SUA750J	NEW! APC Smart-UPS 750VA USB & Serial 100V Beige	UPS, 7b
SUA750JB	NEW! APC Smart-UPS 750VA USB & Serial 100V Black	UPS, 7b



Attachment 1 (Continued): Products covered by this declaration.

APC SKU Number	Product Description	Status
SUA750R2IX38	APC Smart-UPS 750VA RM 2U 230V W/ UL Approval	UPS, 7b
SUA750RM1U	APC Smart-UPS 750VA USB & Serial RM 1U 120V	UPS, 7b
SUA750RM1U	APC Smart-UPS 750VA USB RM 1U 230V	UPS, 7b
SUA750RM2U	APC Smart-UPS 750VA USB RM 2U 230V	UPS, 7b
SUA750RMJ1UB	APC Smart-UPS 750VA RM 1U 100V USB and Serial	UPS, 7b
SUA750XLI	APC Smart-UPS XL 750VA USB & Serial 230V	UPS, 7b
SUM1500RMXLI2U	NEW! APC Smart-UPS XL Modular 1500VA 230V Rackmount/Tower	UPS, 7b
SUM3000RMXLI2U	NEW! APC Smart-UPS XL Modular 3000VA 230V Rackmount/Tower	UPS, 7b
SUPM1500I	APC Smart-UPS Power Module 1500VA 230V	UPS, 7b
SUPM3000I	APC Smart-UPS Power Module 3000VA 230V	UPS, 7b
SURT10000RMXLi	APC Smart-UPS RT 10,000VA RM 230V	UPS, 7b
SURT10000RMXLT	APC Smart-UPS RT 10,000VA RM 208V	UPS, 7b
SURT10000UXI	APC Smart-UPS RT 10000VA 230V No Batteries	UPS, 7b
SURT10000XLI	APC Smart-UPS RT 10000VA 230V	UPS, 7b
SURT10000XLJ	APC Smart-UPS RT 10000VA 200V	UPS, 7b
SURT10000XLT	APC Smart-UPS RT 10000VA 208V	UPS, 7b
SURT1000UXI	APC Smart-UPS RT 1000VA 230V No Batteries	UPS, 7b
SURT1000XLI	APC Smart-UPS RT 1000VA 230V	UPS, 7b
SURT2000UXI	APC Smart-UPS RT 2000VA 230V No Batteries	UPS, 7b
SURT2000XLI	APC Smart-UPS RT 2000VA 230V	UPS, 7b
SURT3000XLI	APC Smart-UPS RT 3000VA 230V	UPS, 7b
SURT3000XLIX322	APC Smart-UPS RT 3000VA 230V W / IEC 309 P / Web Card	UPS, 7b
SURT5000XLi	APC Smart-UPS RT 5000VA 230V	UPS, 7b
SURT5000XLIX438	APC Smart-UPS RT 5000VA 230V with SURT007, AP9610, and Long Life Batteries	UPS, 7b
SURT5000XLJ	APC Smart-UPS RT 5000VA 200V	UPS, 7b
SURT6000XLI	APC Smart-UPS RT 6000VA 230V	UPS, 7b
SURT6000XLJ	APC Smart-UPS RT 6000VA 200V	UPS, 7b
SURT7500RMXLI	APC Smart-UPS RT 7500VA RM 230V	UPS, 7b
SURT7500Xli	APC Smart-UPS RT 7500VA 230V	UPS, 7b
SURT7500XLJ	APC Smart-UPS RT 7500VA 200V	UPS, 7b
SURT7500XLT	APC Smart-UPS RT 7500VA 208V	UPS, 7b
SURT8000Xli	APC Smart-UPS RT 8000VA 230V	UPS, 7b
SURT8000XLJ	APC Smart-UPS RT 8000VA 200V	UPS, 7b
SURTA1500XLJ	APC SMART-UPS RT 1500VA 100V	UPS, 7b
SURTA2400XLJ	APC SMART-UPS RT 2400VA 100V	UPS, 7b



Attachment 1 (Continued): Products covered by this declaration.

APC SKU Number	Product Description	Status
SYH2K6RMJ-C1	APC SYMMETRA RM 2KVA SCALABLE TO 6KVA N+1 200V FOR NEC	UPS, 7b
SYHF6KI	APC Symmetra RM 6kVA N+1 Frame 220-240V	UPS, 7b
SYHF6KJ	APC Symmetra RM 6kVA N+1 Frame 200V	UPS, 7b
SYMIM5	APC Symmetra LX Intelligence Module	UPS, 7b
SYPM2KU	APC Symmetra RM 2-6kVA Power Module (2kVA)	UPS, 7b
SYPM4KI	APC Symmetra LX 4kVA Power Module, 220/230/240V	UPS, 7b
SYPM4KP	APC Symmetra LX 4kVA Power Module, 200/208V	UPS, 7b
BE325-XX	APC SurgeArrest + Battery Backup 325VA	UPS
BE400-XX	APC Back-UPS ES 400VA 230V	UPS
BE500JP	APC ES 500 Battery Backup	UPS
BE550-XX	APC Back-UPS ES 550VA 230V	UPS
BE700-XX	APC Back-UPS ES 700VA 230V	UPS
BE725JP	APC ES 725 100V Battery Backup	UPS
BF350-AZ	Back-UPS ES 350 Australia	UPS
BF500-AZ	Back-UPS ES 500 Australia	UPS

Where XX equals:	Means	Example: APC Part Number	APC Part Description
-FR	France	BE400-FR	APC Back-UPS ES 400VA 230V France
-GR	Germany	BE400-GR	APC Back-UPS ES 400VA 230V Germany
-IT	Italy	BE400-IT	APC Back-UPS ES 400VA 230V Italy
-SP	Spain	BE400-SP	APC Back-UPS ES 400VA 230V Spain
-UK	UK	BE400-UK	APC Back-UPS ES 400VA 230V UK

UPS, 7b: Products designated by APC as Uninterruptible Power Supplies (UPSs) that are utilizing Exemption 7b, which allows the continued use of lead in solder for products that are classified as Server, Telecommunications and Network Infrastructure.

UPS: Products designated by APC as Uninterruptible Power Supplies (UPSs)

Battery: Products designated by APC as Batteries that uniquely support UPSs. The Batteries themselves are not subject to RoHS compliance, but associated hardware is compliant with the RoHS standard.