



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, appearing to read '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.