



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

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May 29, 2007

Mr. Joe Musso
STP Chair – UL Subject 987
Underwriters Laboratories Inc.
333 Pfingsten Road
Northbrook, IL 60062

Re: UL 987, *Standard for Stationary and Fixed Electric Tools*

Dear Mr. Musso:

Enclosed with this letter are comments from the U.S. Consumer Product Safety Commission (CPSC) staff* regarding a March 30, 2007, ballot on proposed requirements for UL 987, *Standard for Stationary and Fixed Electric Tools*. CPSC staff comments are related to proposals to address blade contact associated with table saws. These comments have also been transmitted to Underwriters Laboratories using the Collaborative Standards Development System (CSDS).

Sincerely,

A handwritten signature in black ink, appearing to read "Caroleene Paul", is written over a horizontal line.

Caroleene Paul

Enclosure

cc: Colin Church, CPSC Voluntary Standards Coordinator

* These comments are those of the CPSC staff, have not been reviewed or approved by, and may not necessarily represent the views of, the Commission.

CPSC Staff Comments* to Section 40A.2 Table Saw Blade Guards

CPSC staff is concerned that some of the requirements contained in the March 30, 2007, ballot are design requirements rather than performance requirements. Staff believes that this approach may preclude future development of guard designs that are safer and that more effectively address blade contact injuries associated with table saws. Staff has the following specific comments regarding the ballot proposals**:

1. *40A.2.1(a) The blade guard shall consist of a top barrier guarding element and two side barrier guard elements, one on each side of the saw blade. These guarding elements may be independent of each other in construction and movement or combined.*

This requirement is not performance related and appears to describe a type of blade guard. CPSC staff suggests deleting design restrictive descriptions of the guard and deferring to performance requirements that use a probe to test the ability of the guard to prevent contact with the cutting zone of the blade. These performance requirements are given in sections 40A.2.1(b) and (d).

2. *40A.2.1(e) The vertical projection of the top barrier guard onto the horizontal table shall extend at least 1 inch (25.4mm) forward from the front edge of the blade above the table at the maximum depth of cut.*

CPSC staff requests that the rationale for this requirement and the 1 inch minimum dimension be provided.

3. *40A.2.1(k) A blade guard is not required for attachments, such as a dado set, a molding head and the like that are not intended to cut through the workpiece. In addition, a blade guard is also not required for single blade non-through operations. Examples of some single blade non-through operations include such as resawing, kerfing, plunge cuts, and or cove cuts.*

These statements are descriptive of a product and are not performance or safety requirements. CPSC staff believes a safer blade guard design should not require removal of the guard to perform non-through cuts.

4. *40A.5.3 The antikickback device described in 40A.5.1 is not required for operations that do not cut through the workpiece, for example, when using dado sets or molding heads or when making plunge or cove cuts.*

This statement is descriptive of a product and is not a performance or safety requirement. It appears that this statement relates to the preceding performance test for compliance of

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** Proposed requirements are verbatim and are shown in italics.

antikickback devices. CPSC staff suggests renumbering the statement as letter f) under section 40A.5.2.

5. *40A.10.2 The guard and/or the antikickback device(s) attached to the spreader or riving knife/spreader combination unit shall be so constructed, as not to create any new mechanical hazards if a sawing operation of a material thicker than the blade height above the table is attempted.*

40A.10.2.1 Compliance with 40A.10.2 is met if the guarding system allows the passage of material to the blade where the thickness of the material is equal to the blade height above the table of the saw at any depth of cut and bevel setting, but does not allow the passage of material to the blade where the material is thicker than the blade height above the table of the saw for any depth of cut setting, plus 0.25 inch (6 mm) at the 45° bevel setting and plus 0.40 inch (10 mm) at the 90° bevel setting.

CPSC staff is unable to interpret the intent of requirement 40A.10.2 and its broad wording of “not [creating] any new mechanical hazards if a sawing operation of a material thicker than the blade height above the table is attempted.” Requirement 40A.10.2.1 does not provide clarification and, in fact, causes more confusion when trying to interpret its meaning. CPSC staff is unable to determine what mechanical hazards are prevented by the design requirement in section 40A.10.2.1 and requests that the rationale for this requirement be provided. Requirement 40A.10.2.1 appears to implicitly require removal of the guarding system for non-through cuts because material thicker than the blade height cannot pass the guard. CPSC staff is concerned that making removal of the guard a requirement may preclude future guard designs that do not require removal for non-through cuts. CPSC staff believes a safer blade guard design would not require removal of the guard to perform non-through cuts.