United States
CONSUMER PRODUCT SAFETY COMMISSION
Washington, D.C. 20207

MEMORANDUM

DATE: November ~~7~~ 17, 2003

TO : ES

Through: Todd A. Stevenson, Secretary, ~~OS~~

FROM : Martha A. Kosh, OS

SUBJECT: Petition Requesting Performance Standards for a System to Reduce or Prevent Injuries from Contact with the Blade of a Table Saw **(comment period extended to November 7, 2003)**

ATTACHED ARE COMMENTS ON THE CC 03-1

COMMENT	DATE	SIGNED BY	AFFILIATION
CC 03-1-1	4/16/03	Andrew Felcher	Andrew.H.Felcher@kp.org
CC 03-1-2	7/09/03	Bob Gramza	bgramza@ameritech.net
CC 03-1-3	7/09/03	C. Johnson	cmjohnson@cfl.rr.com
CC 03-1-4	7/09/03	Jack Dahlgren	538 Alhambra Road San Mateo, CA 94402
CC 03-1-5	7/10/03	Dave Mundt	709 East Inskip Road Knoxville, TN 37912
CC 03-1-6	7/10/03	Judy Bunetta	2237 Stout Street Englewood, FL 34223
CC 03-1-7	7/10/03	Thomas Bunetta	Advanced Hearing Aid Systems, Inc. 655 S. Indiana Ave. Englewood, FL
CC 03-1-8	7/14/03	Kenneth Dolph	50 Holland Ave. West Seneca, NY 14224
CC 03-1-9	7/14/03	Michael Circo	135 Arquilla Drive Algonquin, IL 60102
CC 03-1-10	7/14/03	John Miliunas	at5vette@execpc.com
CC 03-1-11	7/14/03	Kevin Post	W6690 Reef Road Onalaska, WI 54650

Petition Requesting Performance Standards for a System to Reduce or Prevent Injuries from Contact with the Blade of a Table Saw

CC 03-1-12	7/14/03	Carl Eyman	1 C Audubon Ct Thibodaux, LA 70301
CC 03-1-13	7/16/03	William Kelley	606 20th St, East Tifton, Ga 31794
CC 03-1-14	7/16/03	Matthew Harper	5 Butternut St Hudson, NH 03051
CC 03-1-15	7/17/03	Jimi Cleek Staff Engineer	ABC Radio Networks 13725 Montfort Dr. Dallas, TX 75240
CC 03-1-16	7/17/03	Lee Harper	LeeHarper@aol.com
CC 03-1-17	7/18/03	Gerald Reed	gerald@reed.org
CC 03-1-18	7/18/03	Robert Visage	410 Virginia Ave. Baltimore, MD 21221
CC 03-1-19	7/18/03	Rickey Spurlock	2118 Zion Rd. Columbia, TN 38401
CC 03-1-20	7/18/03	Alick Munro President	Munro Products, Inc. Reno, NV 89511
CC 03-1-21	7/21/03	Dr. Gerald Reed	10 Crescent Dr. Glencoe, IL 60022
CC 03-1-22	7/21/03	Jim Devlin PE, API 653 Authorized Inspector	Tank Consultants, Inc.
CC 03-1-23	7/21/03	K. Pannebecker	3019 Fireweed Ct. Florissant, MO 63031
CC 03-1-24	7/21/03	Benjamin Powell	2890 E Huntington Blvd Fresno, CA 93721
CC 03-1-25	7/22/03	Stan Thieling	129 Firecrest Dr. Brandon, MS 39042
CC 03-1-26	7/23/03	Chris Lockwood	10508 NE 36th Ave. Vancouver, WA
CC 03-1-27	7/24/03	Doanld Hyson	601 S. Church St. Winnebago, IL 61088
CC 03-1-28	7/27/03	David Wright Architect & Woodworker	49 Laurel Ridge Greenville, SC 29609

Petition Requesting Performance Standards for a System to Reduce or Prevent Injuries from Contact with the Blade of a Table Saw

CC 03-1-29	7/28/03	Lawrence Leonard	American Academy of Orthopedic Surgeons 26 Amerescoggin Rd Falmouth, ME 04105
CC 03-1-30	7/28/03	Tim Swartz Woodshop Supervisor	Wall/Goldfinger, Inc. 7 Belknap St, Suite 3 Northfield, VT 05663
CC 03-1-31	7/28/03	David Fanning	22409 SW Newland Rd Wilsonville, OR 97070
CC 03-1-31a	7/28/03	David Fanning	address same as above
CC 03-1-31b	9/04/03	David Fanning	address same as above
CC 03-1-32	8/01/03	Kevin Groenke Manager	College of Architecture And landscape Architecture 139 Rapson Hall 89 Church Street Minneapolis, MN 55455
CC 03-1-33	8/04/03	Del Fussell	11455 N Antelope Lane Parker, CO 80138
CC 03-1-34	8/05/03	Kerry Gough Attorney	Gough & Company Counselors at Law 160 Franklin St, Ste 200 Oakland, CA 94607
CC 03-1-35	8/07/03	Bernie Bessette	1306 Forest Hill Dr, SW Aiken, SC 29801
CC 03-1-36	8/12/03	Aaron Moore	423 South Street Holliston, MA 01746
CC 03-1-37	8/12/03	John Machacek CEO	Northfield Foundry & Machine Co. 320 North Water Street P.O. Box 140 Northfield, MN 55057
CC 03-1-38	8/13/03	Al Davidson	AL6449@aol.com
CC 03-1-39	8/13/03	Jeffrey Nolan	jeffrey.nolan@sap.com
CC 03-1-40	8/13/03	Mike Moskau	Mmoskau@co.jefferson.co.us
CC 03-1-41	8/14/03	Steven Boney	1694 Meadows Lane Luxemburg, WI 54217
CC 03-1-42	8/16/03	Mark Allen	mark.allen104@verizon.net

Petition Requesting Performance Standards for a System to Reduce or Prevent Injuries from Contact with the Blade of a Table Saw

CC 03-1-43	8/17/03	Patrick Sariego	15609 Scenic Shores Dr. Yelm, WA 98597
CC 03-1-44	8/17/03	Mike Harrison	12926 Briar Road Liberty, MO 64068
CC 03-1-45	8/17/03	H. Pringnitz	4001 A Stonebridge Round Rock, TX 78681
CC 03-1-46	8/18/03	Bryan Danner	5639 Primrose Ave. Indianapolis, IN 46220
CC 03-1-47	8/19/03	Mike Barrett	5919 Oetjen Blvd Norfolk, Va 23502
CC 03-1-48	8/19/03	K. McReynolds	mcreynolds199@msn.com
CC 03-1-49	8/20/03	Stephen Gass President	SawStop, LLC 22409 SW Newland Rd. Wilsonville, OR 97070
CC 03-1-50	8/27/03	Tommi Smith Coordinator of Of Campus Evironmental Services	Tennessee State Univ. 3500 John A. Merrit Blvd Nashville, TN 37209
CC 03-1-51	9/01/03	Tom Hewitt	TWHDesign@aol.com
CC 03-1-52	9/08/03	Dr. John Miyano M.D.	bustenbonz@comcast.net
CC 03-1-53	9/9/03	Michael Davis	1818 Westlake Ave., N Suite 106 Seattle, WA 98109
CC 03-1-54 **rec'd 9/10**	9/04/03	Carl Love Ph.D.	11170 Fairfield St. Beaverton, OR 97005
CC 03-1-55	9/29/03	G. Heilman, Jr.	1850 NE Noble Ave. Corvallis, OR 97330
CC 03-1-56	9/22/03	Jim Beyreis Vice President Engineering	Underwriters Laboratories, Inc. 333 Pfingsten Rd. Northbrook, IL 60062
CC 03-1-57	10/03/03	Michael White	mdwhite@consbio.org
CC 03-1-58	10/06/03	Marisa Wampler	mwampler@consbio.org

Petition Requesting Performance Standards for a System to Reduce or Prevent Injuries from Contact with the Blade of a Table Saw

CC 03-1-59	10/24/03	C. Johnson Secretary-Treasurer	Compressed Air and Gas Institute 300 Summer Ave. Cleveland, OH
CC 03-1-60	10/26/03	Ed. Johnson	King George, VA E760@aol.com
CC 03-1-61	11/05/03	Stephen Gold Vice President	National Association of Manufacturers 1331 Pennsylvania Ave,NW Suite 600 Washington, DC 20004
CC 03-1-62	11/06/03	Daniel Lanier	Power Tool Institute Inc 10 Light Street Baltimore, MD 21202
CC 03-1-63	10/24/03	T. Duesterberg President & CEO	Manufacturers Alliance/ MAPI 1525 Wilson Blvd. Suite 900 Arlington, VA 22209
CC 03-1-64	11/24/03	Stephen Gass David Fanning James Fulmer	22409 S.W. Newland Rd Wilsonville, OR 97070
CC 03-1-65	11/25/03	Robert Morris	12504 Colby Dr. Woodbridge, Va 22192
CC 03-1-66	12/02/03	Rick Baker	1721 S.W. 30th St. Topeka, KS 66611
CC 03-1-67 **(LATE)**	3/05/04	Edward Severt	Box 275 Bolt, WV 25817
CC 03-1-68 **(LATE)**	3/05/04	Dennis McDonaugh	434 Elmhurst Ave. San Antonio, TX 78209
CC 03-1-69 **(LATE)**	3/05/04	Bill Karow	30 Cornerbrook Circle Windham, ME 04062
CC 03-1-70 **(LATE)**	3/08/04	Ernest Kuhn	P.O. Box 1366 Richland, WA 99352

Stevenson, Todd A.

From: Cornell, Larry G.
Sent: Thursday, April 17, 2003 5:30 PM
To: Stevenson, Todd A.
Cc: Kumagai, Mark E.; Nava, Frank J.
Subject: FW: Power tablesaw safety

Todd,

FYI

This person has sent us a message in support of a power table saw petition that has apparently been filed with CPSC.

-----Original Message-----
From: Nava, Frank J.
Sent: Wednesday, April 16, 2003 10:50 AM
To: Cornell, Larry G.
Subject: FW: Power tablesaw safety

From: Andrew.H.Felcher@kp.org [mailto:Andrew.H.Felcher@kp.org]
Sent: Tue 4/15/2003 6:58 PM
To: Information Center
Cc: Naylis, Gerard J.; Ault, Eric B.; Nava, Frank J.
Subject: Power tablesaw safety

Dear CPSC,

I am a physician in Oregon. I lost parts of three of my fingers to a saw injury three years ago

I would like you to look into a new safety device for power tablesaws. It is described below. It is called Sawstop. It works by the same principle that electric lights do which turn on-and-off just by touching the base -- the change in impedance in a circuit when touched by human being. The blade of these saw is part of a similar circuit -- if you hand or finger or any part of your body touch the blade, it stop within one quarter revolution significantly limiting tissue damage to the operator.

Full disclosure: I know about this saw because I know the inventor. But I am not financially involved in anyway. I simply think it is an amazing innovation. Like gun safety locks, it could reduce finger, hand and arm injuries on table saws dramatically.

But no company is willing to add the device to their saws. It would add 50-75 per saw. Without any financial reason to do it, they just won't. Sounds like the gun industry and safety locks!

I think you should mandate this device on saws. It is relatively inexpensive and if I had had it on my saw, I'd still have my fingers! See

their website <www.sawstop.com>. A petition on their site is below. I think they are right! Please help the consumer and force industry to accept this effective safety device.

Thank you.

Sincerely,
Andrew Felcher, MD
<felcher@kp.org>

PETITION

Requesting the Consumer Product Safety Commission
To Initiate Rulemaking for Table Saws

We, the undersigned, hereby petition the Consumer Product Safety Commission under 5 U.S.C. §553(e) and 15 U.S.C. §2058(i) to initiate rulemaking for table saws. We propose a rule substantially as follows:

Every table saw designed primarily for cutting wood with a blade having a nominal diameter of 12 inches or less shall be equipped with the following:

1) a detection system capable of detecting contact or dangerous proximity between a person and the saw blade when the saw blade is a) spinning prior to cutting, b) cutting natural wood with a moisture content of up to 50%, c) cutting glued wood with a moisture content of up to 30%, and d) spinning down after turning off the motor;

2) a reaction system to perform some action upon detection of such contact or dangerous proximity, such as stopping or retracting the blade, so that a person will be cut no deeper than 1/8th of an inch when contacting or approaching the blade at any point above the table and from any direction at a rate of one foot per second;

3) a self-diagnostic capability to verify functionality of key components of the detection and reaction systems; and

4) an interlock system with the motor so that power cannot be applied to the motor if a fault interfering with the functionality of a key component in the detection or reaction system is detected.

The detection and reaction systems shall be designed to function automatically when the saw is turned on, however, the saw may include a bypass function to allow a user to volitionally bypass the system to cut, for example, conductive materials such as aluminum. The detection and reaction systems may be designed to function with only certain saw blades as specified in an operation manual or in markings on the saw.

Saws petition

Stevenson, Todd A.

From: Bob Gramza [bgramza@ameritech.net]

Sent: Wednesday, July 09, 2003 12:23 PM

To: Stevenson, Todd A.

Subject: petition cp 03-2

Upon reviewing this petition, it appears that the company requesting this petition would be the sole benificiary of all revenues generated if this is granted. Their company holds patents that all other manufacturers would have to license. This appears to be a self serving revenue stream in the disguise of public protection. There are a substantial number of safety devices currently on the market to address this concern. Their device would increase the cost of saws as well as replacement blades and interlocks if the device trips. I do not believe this device is in the best interest of the general public. If this petition was approved it should be with the stipulation that the technology is put into the public domain so as not to increase costs to the consumer. I would believe that SAW STOP would turn down this proposal as it would curtail their MONOPOLY on the market.

Stevenson, Todd A.

Sent petition

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From: Chris Johnson [cmjohnson@cfl.rr.com]
Sent: Wednesday, July 09, 2003 2:40 PM
To: Stevenson, Todd A.
Subject: Oppose this blatant attempt by a company to profit by having its patented product made mandatory!

Greetings.

I am writing to state my strong opposition to the petition (CP 03-2) filed recently with the CPSC, which, if enacted, would in simple terms make it mandatory for manufacturers of table saws for woodworking applications to install a safety product known as "Saw Stop", which is admittedly effective in its design intent, which is to bring a saw blade to a virtually instantaneous halt if the blade contacts the operator's flesh, resulting in greatly reduced potential for injury.

The reason for my opposition to this proposed rule is that it would effectivel grant a MONOPOLY to a single company, requiring their comprehensively patented product to be installed as standard equipment on saws made by any manufacturer and sold in the United States.

I strongly oppose such a blatant attempt by a company to reap huge, UNMERITED profits by seeking to get its product made mandatory.

I don't think I would oppose the idea so much if there was substantial competition in this market for this type of safety device, but in fact this company has comprehensively patented the concept and there are no competing devices, nor are there likely to be any which do not infringe upon the relevant patents, putting this company into a position whereby a ruling by the CPSC to make this type of product mandatory would cause the company to hold a monopoly, or trust, and therfore would violate Federal anti-trust laws.

This proposal must be rejected.

Thank you for your time. Quotes from CPSC filings from the Federal Register, taken from articles posted to the internet, follow.

Very sincerely,

Christopher M. Johnson
cmjohnson@cfl.rr.com

Text quoted from the CPSC, published to the internet:

[Federal Register: July 9, 2003 (Volume 68, Number 131)]
[Notices]
[Page 40912]
From the Federal Register Online via GPO Access [wais.access.gpo.gov]
[DOCID:fr09jy03-64]

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CONSUMER PRODUCT SAFETY COMMISSION

Petition Requesting Performance Standards for a System To Reduce or Prevent Injuries From Contact With the Blade of a Table Saw (Petition No. CP 03-2)

AGENCY: Consumer Product Safety Commission.

ACTION: Notice.

SUMMARY: The Commission has received a petition (CP 03-2) requesting that the Commission issue performance standards for a system to reduce or prevent injuries from contact with the blade of a table saw. The Commission solicits written comments concerning the petition.

DATES: The Office of the Secretary must receive comments on the petition by September 8, 2003.

SUPPLEMENTARY INFORMATION: The Commission has received correspondence from Messrs. Gass, Fanning, and Fulmer, et al., requesting that the Commission issue a rule prescribing performance standards for a system to reduce or prevent injuries from contact with the blade of a table saw. The petitioners assert that a table saw not so equipped poses an increased risk of severe injuries including lacerations and amputations.

The petitioners maintain that a system to reduce or eliminate this risk must include the following: (1) A detection system capable of detecting contact or dangerous proximity between a person and the saw blade when the saw blade is--(a) spinning prior to cutting, (b) cutting natural wood with a moisture content of up to 50%, (c) cutting glued wood with a moisture content of up to 30%, and (d) spinning down after turning off the motor; (2) a reaction system to perform some action upon detection of such contact or dangerous proximity, such as stopping or retracting the blade, so that a person will be cut no deeper than \1/8\ of an inch when contacting or approaching the blade at any point above the table and from any direction at a rate of one foot per second; (3) a self-diagnostic capability to verify the functionality of key components of the detection and reaction systems; and (4) an interlock system with the motor so that power cannot be applied to the motor if a fault interfering with the functionality of a key component in the detection or reaction system is detected.

The Commission is docketing the correspondence as a petition under provisions of the Consumer Product Safety Act, 15 U.S.C. 2051-2084.

Interested parties may obtain a copy of the petition by writing or calling the Office of the Secretary, Consumer Product Safety Commission, Washington, DC 20207; telephone (301) 504-0800. The petition is available on the CPSC Web site at http://www.cpsc.gov <http://frwebgate.access.gpo.gov/cgi-bin/leaving.cgi?from=leavingFR.html&log=linklog&to=http://www.cpsc.gov>. A copy of the petition is also available for inspection from 8:30 a.m. to 5 p.m., Monday through Friday, in the Commission's Public Reading Room, Room 419, 4330 East-West Highway, Bethesda, Maryland.

Dated: July 2, 2003.

Todd A. Stevenson,

Secretary, Consumer Product Safety Commission.

[FR Doc. 03-17327 Filed 7-8-03; 8:45 am]

Stevenson, Todd A.

Saw pet 4

From: Jack [J_C@mvps.org]
Sent: Wednesday, July 09, 2003 3:50 PM
To: Stevenson, Todd A.
Subject: Petition CP 03-2, Petition for Performance Standards for Table Saws

Commission,

I have just read Petition CP 03-2 and I object to the use of petitioning the product safety commission as a method to gain a commercial advantage for a particular product.

In this case the "performance specification" is clearly drawn to include only a patented proprietary device. This would have the effect of creating a monopoly and thus insuring income of 8% of the wholesale cost of all such table saws sold in the United States to the very company that is proposing the regulation.

If the goal of the product safety commission is to ensure safety then encouragement of competition for methods of making table saws safer would be a more appropriate response. Granting the entire market for safety devices to a single patent holder (one who has the power to challenge and discourage any similar innovations) is contrary to the principles of free enterprise and will stifle innovation in this area.

I request that you reject this petition. If the commission determines that a performance based specification is necessary, then it should be developed independently so that it does not restrict the implementation to a single patented device.

This so called "performance specification" is not truly a performance specification. It describes the function of a specific device in fairly narrow terms (% of water content of the wood for example) which artificially narrow the the scope of solutions to the problem so that the only remaining solution is that which is a patented product of those requesting the regulation. The only performance that is important is that injury is prevented or at least minimized. There are certainly alternative methods of achieving this result. Please do not limit our choice by adopting this particular solution.

Thank you for your consideration.

Jack Dahlgren
538 Alhambra Road
San Mateo, CA 94402

Stevenson, Todd A.

Sam put 5

From: xmundt [xmundt@esper.com]
Sent: Thursday, July 10, 2003 1:31 AM
To: Stevenson, Todd A.
Subject: Petition CP 03-2, Petition for Performance

Petition CP 03-2, Petition for Performance Standards for Table Saws

Gentlemen.

While in theory, this is an admirable suggestion, In actual fact, it is not a good thing. It appears that the vendor, whose product has already been turned down in the open marketplace, is attempting to subvert our system of laws to ensure not only a monopoly but, a legislative requirement for their product.

If this product is a good idea, then, let the normal forces of the free market work without hinderence and let it filter through the product market place. I, though, have several concerns with it that would ensure that I would never purchase a product that incorporated this technology. However, as far as I can tell, it will add signficant upfront and maintenance costs to the machine, costs that far outweigh any benefits the technology might have.

There are reliability issues here. There is the question of "how reliable IS it?" The consequences of this relatively sophisticated technology failing is serious and irrepairable damage. This is not a seat belt...and the more complicated the technology the greater the chance of failure.

There is also the question of false alarms. If the mechanism is triggered incorr"ectly, it will not only bring the process of building the project to a screeching halt, but, it will incur non-trivial expense and time to restore the tablesaw to functionality again.

A large percentage of tablesaw injuries come from kickbacks", where the cut stock is twisted slightly, contacting the blade, and being propelled at 100 MPH back towards the user of the saw. There is no evidence that this product will (or can) guard against this far more common type of injury.

Finally, there is the fact that using a table saw is a dangerous task. The only way to truly use the tool safely is to be constantly aware of the danger and to remain alert and on guard. This product will, without a doubt, cause that awareness to erode and may well cause an increase in the likelyhood of an accident that would result in serious injury.

Dave Mundt
709 East Inskip Road
Knoxville, TN 37912

Feel Free to visit my home pages at:
http://www.esper.com/xvart/index.html

***My Opinions are my own...and do not reflect the wisdom or position of my clients ***

Stevenson, Todd A.

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From: Thomas Bunetta [advanced@ewol.com]
Sent: Thursday, July 10, 2003 10:16 AM
To: Stevenson, Todd A.
Subject: Petition CP 03-2, Petition for Performance

I am opposing this proposal on the grounds that
it is a blatant attempt on the part of a manufacturer to drum up
business by getting his product made mandatory by law...a product
that is under a comprehensive patent.

MONOPOLIES ARE ILLEGAL.
Judy Bunetta
2237 Stout Street
Englewood, FL 34223

Stevenson, Todd A.

From: Thomas Bunetta [advanced@ewol.com]
Sent: Thursday, July 10, 2003 10:13 AM
To: Stevenson, Todd A.
Subject: Petition CP 03-2, Petition for Performance

Deny this petition, please!
It appears to me this is a company that has failed in the market place attempting to force sales of their products through legislation!
This should be denied, and prohibited from reaching legislature as a serious proposal!
Thanks,
Thomas Bunetta
Advanced Hearing Aid Systems, Inc.
655 S. Indiana Ave
Englewood, FL
941-474-8393

Saw pet comment

Stevenson, Todd A.

From: Kenneth Dolph [kidolph@broadviewnet.net]
Sent: Monday, July 14, 2003 8:57 AM
To: Stevenson, Todd A.
Subject: Saw-Stop

I am not in favor of mandating the Saw-Stop product into all table saws. I think that it adds an unnecessary layer of complexity to the saw. We will always be wondering if the saw is going to work or the device slam our work to a stop. What if we rely on it and it doesn't work? Then what damage to our equipment will it cause?

Kenneth I. Dolph
50 Holland Avenue
West Seneca NY 14224
716-684-3695 (work)

Saw put

Stevenson, Todd A.

From: Circo, Mike [MCIRCO@allstate.com]
Sent: Monday, July 14, 2003 1:52 PM
To: Stevenson, Todd A.
Subject: Opposition to Petition CP03-2

I am writing to express my opposition to the current Petition #CP03-2 "Requesting Performance Standards for Tablesaws (0841)"

As a user of the associated Tablesaws, I feel that such regulations would be overbearing and unnecessary. The types of injuries avoided by this device are very limited and not common in the usage of these tools. The costs of such regulation would hurt the hobbyist, professionals and industries using the tools and would only benefit the petitioner.

I believe that the Petitioner (SawStop) is acting not in the public interest, but for personal benefit.

Michael Circo
135 Arquilla Drive
Algonquin, IL 60102

Stevenson, Todd A.

Saw Comment 10

From: Information Center
Sent: Monday, July 14, 2003 12:12 PM
To: 'at5vette@execpc.com'
Subject: Sawstop

Hello,

We have forwarded your request for information to the appropriate agency personnel.

Please be advised that you may obtain CPSC publications, recalls and general safety-related information via our web site at www.cpsc.gov. Click on the "Search" icon and type in your topic. You may also file an incident report via the web site mentioned above. If you have additional inquiries, you may call our toll-free hotline at 1-800-638-2772, Monday - Friday, 8:30am to 5:00pm, Eastern Standard Time. Press 1 to begin and then press 300 to speak with a representative.

man/tm

-----Original Message-----
From: John K. Miliunas [mailto:at5vette@execpc.com]
Sent: Sunday, July 13, 2003 9:29 AM
To: Information Center
Subject: SawStop
Importance: High

To whom it may concern:

I note that you gave the makers of SawStop an award. In the context of that award, appeared: ""Safety is good business." Especially the "...good business" part of that amuses me. It's "good business" alright, but for who???!!! Oh yeah...Must be the makers of said device. Makers, I might add, who have NOT been overly successful in the business part of their venture. And how could they? I visit, subscribe and read any number of paper and online periodicals related to woodworking. I don't recall seeing *any* advertising by these people. They probably have all their $$ invested in the research, tooling, etc... So now they come to our tax payer supported government agency to mandate their product on all table saws! Wow. How convenient for them! They can support their greed without having to spend advertising dollars at the expense of the tax payer and woodworker, by not giving us a choice! There's Democracy for you!

You talk about safety being paramount. No arguments there. But, if you're going to mandate anything, mandate that the OEM's come up with a design with the end result similar to this device and mandate that it be offered to the buyer as an *option*! That would promote competition between the manufacturers, promote safety and keep the price of the equipment at a competitive level. Oh yeah...It would spoil the money-grubbing plan of the SawStop makers. But alas, this too could be a mute point, because there's equally as good a chance that the CPSC or someone there within, is already reaping some "benefits" from the makers of the proposed device. In that case, the other manufacturers stand little or no chance of developing or offering (as an option) their own device.

Personally, I think the whole thing simply stinks of greed! There are way, WAY too many tools both, powered and manual, in a woodworking shop, which can cause minor to serious injury. If this is mandated, where in the Hell does it stop? My own most serious injury in my WW shop was with a chisel. Maybe somebody at SawStop will come up with some type of air-bag for

that and have the CPSC mandate it as a necessary device on all chisels.

Fearing the Big Brother syndrome....

John K. Miliunas

at5vette@execpc.com <mailto:at5vette@execpc.com>

Table Saw pet. comment

Stevenson, Todd A.

From: Kevin Post [kevinp@firstlogic.com]
Sent: Monday, July 14, 2003 6:24 PM
To: Stevenson, Todd A.
Subject: Petition CP 03-2

Recently, a petition was filed (CP 03-2) in an effort to make a blade-stopping device mandatory on all table saws with blades 12" and under. I wish to object to the petitioner's request. The petition contains data and descriptions of a device that has been designed and patented by Dr. Gass. It is my belief that he is simply trying to create demand for his device which he has been unable to create using other means.

I am a woodworking hobbyist and have been using table saws and other power tools for nearly twenty years without an accident. I do not agree that this device should be a required component of all table saws. Dr. Gass has filed 35 patents on devices designed to stop cutters on a variety of woodworking machines. I believe that what Dr. Gass and is seeking is a way to force manufacturers of woodworking machinery to incorporate technology for which he holds patents in order to profit from them. As stated in his petition, this device would account for approx. 8% of the cost of every table saw manufactured. Next he will seek mandates for similar devices for band saws, then routers, then shapers, etc. for which he also has filed patents. He has defended against this charge by stating the specifications presented in the petition are sufficiently broad to allow manufacturers to develop their own solutions. The patents are also sufficiently broad to allow him to claim infringement of his patents by manufacturers who develop similar devices. In my opinion, the primary motive of this petition is not improved safety. If it were, his patents would be placed in the public domain. Consider the red flags and do not approve this petition.

When the device is triggered, it destroys itself, could damage the blade and probably the saw. I am concerned that the device has short-comings that will cause it to trigger under false conditions. This will cost me time and money, needlessly. Despite the statistics cited in the petition (table saw injury occurs every 18 minutes) the need for a mandate of this device has not been proven. I've never seen these statistics anywhere and my experience, as well as those of my peers, do not support these claims. The ten intact digits I'm using to type this message are testament to that. I do not want to be forced to spend additional money on tools that I already use with great care and safety.

Thank you for you consideration,

Kevin Post
W6690 Reef Road
Onalaska, WI 54650-9440

Saw comments

Stevenson, Todd A.

From: Carl Eyman [ceyman@alum.mit.edu]

Sent: Monday, July 14, 2003 12:21 PM

To: Stevenson, Todd A.

Subject: Saw Stop

I do not think its use should be mandated - at least, in non-public applications Carl Eyman, 1 C Audubon Ct, Thibodaux LA 70301

13

Table Saw Pet. Comment

Stevenson, Todd A.

From: Bill Kelley [billkelley@friendlycity.net]
Sent: Wednesday, July 16, 2003 11:15 PM
To: Stevenson, Todd A.
Subject: Petition CP 03-2, Petition for Perfomance Standards for Table Saws

606 20th Street East
Tifton, GA 31794-3612
July 16, 2003

Mr. Todd A. Stevenson
Office of the Secretary
Consumer Product Safety Commission
Washington, DC 20207

Subject: CPSC Petition No. CP03-02 Requesting Performance Standards for Table Saws.

Dear Mr. Stevenson:

When I first heard that there was a device to stop a saw blade before it cut a finger, etc., I looked for several days for any table saws that might have such a device. Since I was considering purchasing such a saw, it seemed to answer a big concern that I had since I learned how to use such a saw in shops class in high school. When I could find none available, I searched for the e-mail address for the company that had apparently developed such a device. When I found it, I asked them to please let me know if an action like this petition came up. Apparently, the time is now. *So, here is why I support this petition.*

Table saws cutting fingers has a long and all too common history, even among professional woodworkers. I love woodworking and even have a teaching certificate with a minor in industrial arts. I frankly was too leery of having a classroom full of students in shops class for this very reason. Kids and adults all too often will not follow safety needs. No one plans to have an accident, but they sure do happen. When I am working with power tools, electricity, etc., I slow down and try to be careful. However, as careful as I can be, I have had some close calls. Who of us have not said, "woops!" when working with power tools? This is a very common sense approach and far far cheaper than any trip to the emergency room. It should also be less painful.

Sincerely,

William C. Kelley

William C. Kelley

--
This message has been scanned for viruses and
dangerous content by **MailScanner**, and is
believed to be clean.

Table Saw Pet. Comment 14

Stevenson, Todd A.

From: MJHarper@adelphia.net
Sent: Wednesday, July 16, 2003 11:52 PM
To: Stevenson, Todd A.
Subject: Petition CP 03-2, Petition for Performance Standards for Table Saws.

Dear Sir,

I am writing to let my feelings be known AGAINST this petition.

While the device in question does have many merits, the added cost of the device and customization required to incorporate it into all the table saw systems available today is non-trivial. Further, this device is already known to most wood workers and saw manufacturers, the demand simply is not there for it. Further, while it can be adapted to some models of saws, it cannot be adapted to all and still keep the devices within acceptable cost measures for the consumer.

A sturdy blade guard and proper material handling are the best solutions to safety when using any power tool, especially a table saw. Far more injuries happen due to improper feeding of the material, which often induces kick back at the operator, than occur due to operator/blade contact.

Granting this petition will serve no real purpose other than to force a market for a product the industry and public does not want and does not see as necessary. Like so many other wonderful ideas; it does what it is supposed to do, but no one wants it. That is unfortunate for the inventors, but that is certainly not grounds for granting the petition. A table saw is no more or less dangerous than any other tool when used properly. Work to educate operators, not put into place safety measures that will lead to lack luster usage and attention to personal safety.

Thank you.

-Matthew J. Harper
5 Butternut St
Hudson NH, 03051

603-883-9557

Table Saw post comment 13

Stevenson, Todd A.

From: Cleek, James M. [James.M.Cleek@abc.com]
Sent: Thursday, July 17, 2003 11:43 AM
To: Stevenson, Todd A.
Subject: Petition CP 03-2, Petition for Performance

Aside from padding the pockets of said petitioner who has filed for patents I see no real value to this system. Electronic devices fail on a regular basis and even with self checks there is no assurance that that the warnings will be heeded and not worked around. Injuries that this device would protect us from are caused by poor safety practices and not from inherent design flaws in the machine itself. No tool can be made Idiot proof. This might be a good addition for teaching institutions but for most uses would simple kill productivity and possibly bankrupt some of the smaller tool companies.
Thank You for your time.

Jimi Cleek
Staff Engineer
ABC Radio Networks
13725 Montfort Drive
Dallas, Texas 75240
Phone 972-448-3366
Fax 972-490 9701

Table Saw Pet comment

Stevenson, Todd A.

From: LeeHarper@aol.com
Sent: Thursday, July 17, 2003 10:08 AM
To: Stevenson, Todd A.
Subject: Petition CP 03-2, Petition for Performance Standards for Table Saws.

Consideration of this petition must be tempered by the effect on noncompliant manufacturers who cannot, because of different configuration, adapt to this technology. It should also be recognized that this petition is a self-serving petition that would force purchase or lease of the petitioner's technology.

Thank you.

Lee Harper
Media, PA

Stevenson, Todd A.

17

From: gerald@reed.org
Sent: Friday, July 18, 2003 11:38 PM
To: Stevenson, Todd A.
Subject: CP 03-2

Table Saw Standards.doc

Petition CP -3-2, Petition for Performance Standards for Table Saws.

Saw comment 18

ROBERT M. VISAGE

410 VIRGINIA AVE
BALTIMORE, MARYLAND
21221

phone - 410-687-7066
BAUJOBOYBOBBY-HOO.COM

com

July 18, 2003

DEAR SIRS,

THIS LETTER IS IN REFERENCE TO --CPSC PETITION NO.CP03-02 REQUESTING PERFORMANCE STANDARDS FOR TABLE SAWS.

AS AN AVID WOOD WORKER, I CAN SEE WHERE THE USE OF A DEVICE TO STOP THE SAWBLADE FROM TUNING ON A TABLE SAW WHEN IT COMES IN CONTACT WITH HUMAN SKIN WOULD BE VEY ADVANTAGIOUS,.

THERE WOULD BE MANY LESS INJURIES, I.E., CUTS, LACERATIONS AND AMPUTATIONS. NOT TO MENTION THE MEDICAL COSTS TO REPAIR THESE INJURIES.

IN MY OPINION, THIS DEVICE SHOULD BE REQUIRED AS STANDARD EQUIPMENT ON ALL NEW TABLE SAW SALES.

I ALSO THINK THAT THE DEVICE SHOULD BE AVAILABLE AFTER MARKET AS A RETRO FIT. I KNOW THAT I MYSELF WOULD PURCHASE ONE AND INSTALL IT ON MY TABLE SAW.

THANK YOU FOR TAKING THE TIME TO READ THIS LETTER AND I HOPE IT INFLUENCES YOU IN MAKING YOUR DECISION.

SINCERELY YOURS

RIBERT M. VISAGE

Stevenson, Todd A.

Saw pet 19

From: Rickey Spurlock [rickspur@charter.net]
Sent: Friday, July 18, 2003 9:41 PM
To: Stevenson, Todd A.
Subject: Petition CP 03-2, Petition for Performance Standards for Table Saws.

To whom it may concern,
I feel that the requirement of adding a blade stop of this type to be a table saw is a very bad idea. There are many types of saws available and it would be impossible to mount this device on all of them. I own a Shopsmith which is a multi purpose tool. The saw blade and guard are removed from the tool when you use it in one of it's other setups (Drill press, Lathe, Disk sander, or horizontal boring machine). If this blade stop system can't be installed on this tool then a very versatile piece of equipment could no longer be produced.
Please think about all the equipment that would be affected by this requirement.
Rickey Spurlock
2118 Zion Rd.
Columbia TN 38401

TABLESAW pet comment 20

Hammond, Rocky

From: alick Munro [alick@nvbell.net]

Sent: Friday, July 18, 2003 6:47 PM

To: Hammond, Rocky

Subject: CPSC Petition NO. CP03-02 Requesting Performance standards for tablr

Re petition:
CPSC Petition NO. CPOE-02 Requesting Performance Standards for Table Saws

As the owner of wood-working shops for the past 20 years. I have unfourtunately experienced three finger amputations over the years [of my workers]. Believe me it's not something you want to experience.
If you can equip a circular saw or any hand operated electric saw with an automatic brake for under $1000 it would be criminal not to do so.
When I heard of Mr. Fannings intention to sell his own brand of table saw for around $2500, I immediatly tried to buy one even though my present saw is probably a better cutting tool and a $1000 less in price. I am hoping he is able to supply demand. I am on his 2nd production run list and I am sincerly hoping he is able to provide it. My son is working for me now, he is a fair muscian, think about it. one mistake and he no longer plays.
This technology has been out for some time, I saw it at a woodworking show years ago and assumed it would be available by now. The major corporations making these types of tools are evidently not interested/don't care.
I dislike Government involvement in public affairs, but if there was ever a time to intervene it is now.

Sincerly Alick Munro
President, Munro Products Inc.
Reno, Nevada 89511
775-851-1518

DR. GERALD M. REED

Saw per

July 21, 2003

Office of the Secretary
Consumer Product Safety Commission
Washington, DC 20207

Re: Petition CP 03-2, Petition for Performance Standards for Table Saws

I have received notice of the above referenced petition and wish to make the following comments in support of the petition.

Each year in the United States there are thousands of reported accidents (there are additional thousands that do not require hospital treatment thus not reported) from table saws causing injuries from cut fingers to loss of hands and projectile eye injuries. I know from personal discussions with plastic surgeon hand specialists of numerous cases that required extensive multiple surgical procedures and additional months of rehabilitation services. The cost of table saw accidents aside from the medical expense for loss of work; workman's comp claims and loss of wages and associated costs runs in the multi-millions of dollars. I, personally, as a hobby woodworker have accidentally cut two of my fingers that required plastic surgery. It is beyond my comprehension as both a doctor and a woodworker, why, with the technology available to drastically reduce and possibly eliminate a majority of these accidents that manufacturers of table saws are not required to install this technology.

I strongly recommend the Consumer Product Safety Commission approve performance standards for a system to reduce or prevent injuries from contact with the blade of a table saw.

Respectively Submitted,

Dr. Gerald Reed

10 CRESCENT DRIVE • GLENCOE, ILLINOIS • 60022
PHONE: 847 835 7053 • FAX: 847 835 7056

Saw pet

Stevenson, Todd A.

From: Jim Devlin [jimdevlin@sprintmail.com]

Sent: Monday, July 21, 2003 9:09 AM

To: Stevenson, Todd A.

Subject: Petition CP 03-2, Petition for Performance

I am strongly opposed to this legislation. It seeks to require one company's equipment on all new table saws. I have operated table saws for over 40 years without incident and don't believe this expense should be added to new equipment.

Jim Devlin, PE
API 653 Authorized Inspector
Tank Consultants, Inc.

Sarpet 23

Stevenson, Todd A.

From: Kevin Pannebecker [kpann@sbcglobal.net]
Sent: Monday, July 21, 2003 12:13 PM
To: Stevenson, Todd A.
Subject: Petition CP 03-2, Petition for Performance

Hello,

I wish to register my objection to this proposed performance standard. This petition is nothing more than a last-ditch effort by a company to get the federal government to do something the public refused to do. They have attempted to sell their own products for some time and have been unsuccessful in the most un-biased market today; that of the American consumer. If the consumer sees no need to purchase this product, the CPSC should not compel us to do so. If the company were to increase market demand for this product, and gain a favorable market opinion that increased its sales; then that's the way the American economy is supposed to work. A company's sales should not be contingent on simply a government mandate.

The American consumer is aware of the dangers of table saws and woodworking, and are very cautious around these machines, so this petition is not going to inform the American consumer as much as it will simply add the to the cost of the item they wish to purchase. If the consumer was ignorant as to the dangers of a table saw, then the petition would have merit. As it is, it is an effort by an organization to get the government to mandate their device to insure themselves of a built-in market and, almost, guaranteed sales and profits. The government is not in the business of guaranteeing sales and profits for anyone.

Please register my objection to this new regulation.

Thank you.

Kevin Pannebecker
3019 Fireweed Ct.
Florissant, MO 63031
314.921.6733

Saw pet 24

Stevenson, Todd A.

From: Benjamin O Powell [benpowell1010@juno.com]
Sent: Monday, July 21, 2003 12:38 PM
To: Stevenson, Todd A.
Subject: Petition CP 03-2, Petition for Performance Standards for Table Saws

21 July 2003

Benjamin O. Powell
2890 East Huntington Boulevard
Condo #124
Fresno, CA 93721

Re: **CPSC Petition No. CP03-02 Requesting Performance Standards for Table Saws**

Gentlemen:

On 31 July 2002 while performing a cutting operation on a 10" table saw, the board kicked back causing my right hand to make contact with the saw blade. My right pinky finger and 40% of the palm of my hand was amputated.

It is my opinion that if this table saw had been equipped a safety device as described in the aforementioned petition, I would have emerged with only a minor cut in lieu of an amputation.

I suffered 2 months out of work and a total medical cost in excess of $50,000.

Sincerely,

Benjamin O. Powell

Stan Thieling
129 Firecrest Drive
Brandon, Mississippi 39042

July 22, 2003

Office of the Secretary
Consumer Products Safety Commission
Washington, DC 20207

I am writing in response to your solicitation of written comments concerning petition CP03-2 requesting the Commission issue performance standards for a system to reduce or prevent injuries from contact with the moving blade of a table saw. I signed and strongly support this petition.

I am 56 years old and have been a woodworker for many years. My hand came in contact with a powered table saw blade November 28, 2003, and I am now a partial amputee. I feel somewhat lucky in that my injury was relatively minor; I lost only the last knuckle and tip of my left index finger. I also nicked the tip of my left middle finger and the back of my left thumb on the knuckle. It could have been much worse. I thought I was being safe. The blade guard of my saw was attached and in the down position. In a brief moment of obvious carelessness, my hand went under the front of the guard and it lifted up slightly as if a board were pushed under it. The blade guards on all saws I have ever seen protect only from blade contact from the sides, rear and above, but not the front, which is where all operations take place. Also, all factory blade guards must be removed for operations where the wood is not cut into separate pieces, such as dadoing. The layout of my garage/shop, and the fact that I must move my woodworking equipment to the side to park cars inside, does not allow use of an after-market, overhead guard system. But even an overhead guard system is only slightly safer, at best.

As I was recovering from my injury, I saw an article in a woodworking magazine on the Sawstop system. This system has been demonstrated at numerous woodworking shows and with a video on the internet. It works. It is not perfect, but I have found no other system to compare to it. I am still disappointed that it is not available anywhere. I will buy a saw with that or any other proven system as soon as it is available. The cost of the saw is irrelevant to an amputee, but would be similar to the cost of my medical bills for this incident. My medical bills were just over $9,000, but my insurance allowed only approximately $3200 and paid $2000. I am lucky that I was able to find doctors within my insurance group or the $1200 that I paid could have been much more. Every day I am reminded that the true cost is not in dollars, but in my comfort, convenience, and ability to do things I never thought about before. I'm sure I also worry my wife considerably as I have not stopped woodworking.

I very strongly support any effective system that will prevent or greatly minimize injuries from any type of saw. I have a great deal of money invested in my woodworking equipment, but will not hesitate to replace any equipment that can be made significantly safer.

Yours truly,

Stan Thieling

Stan Thieling

Saw pilot

Stevenson, Todd A.

From: Chris Lockwood [clockwood@ureach.com]
Sent: Wednesday, July 23, 2003 7:33 PM
To: Stevenson, Todd A.
Subject: Petition CP 03-2, Petition for Performance Standards for Table Saws

I highly support this petition and am flabbergasted that the industry hasn't jumped to accept such a safety improvement as represented in the sawstop design. Although not injured by a table saw, I did lose part of my thumb in a hand saw accident. Shortly afterward I made the decision to buy a table saw, one that incorporated the sawstop technology. I was quite surprised that not one of the major manufacturers had chosen to include sawstop or any similar safety device.

Chris Lockwood
10508 NE 36th Avenue
Vancouver, WA
360-546-3329

Get your own "800" number
Voicemail, fax, email, and a lot more
http://www.ureach.com/reg/tag

Saw pet

July 24, 2003

Office of the Secretary
Consumer Product Safety Commission
Washington, DC 20207

Subject: Petition CP 03-2, Petition for Performance Standards for Table Saws

Dear Sirs:

I am writing this letter in the hope that you will enact legislation that will improve the safety of table saws. I read an article in one of my woodworking magazines several years ago about a new invention called "SawStop". The device has been demonstrated to stop a saw blade in milliseconds if it comes into contact with the hand or fingers of the operator. I was extremely interested in the device and have continued E-mail correspondence with the company. My first contact was an inquiry as to whether the device could be retrofitted to my table saw. I was told at the time that the design was such that it could not be installed on an existing machine. The company was aggressively trying to market the safety mechanism to table saw manufacturers.

In just the past few months, after another inquiry about the current status of the device, I learned that none of the saw manufacturers contacted were interested in adapting a safety device into their machines. SawStop's response was to develop their own line of 'contractor's saws' and 'cabinet saws'. The anticipated cost of SawStop's saws equipped with their own safety device is competitive with the prices of saws currently on the market. I have placed a preorder with the company for one of their saws when available. I will sell my Delta Contractor's Saw when the new saw arrives.

I have been a woodworker for over 30 years and have been using a table saw in my shop for the entire time. My table saw is used on virtually every project built in my shop. I try to be careful with all my power equipment but accidents happen in the blink of an eye

for seemingly no reason. I definitely would welcome any device that minimizes the chance of severe injury with any of my power equipment.

While I have not been severely injured on my table saw, my son nearly lost the thumb of his left hand in a table saw accident over 20 years ago. I do not know to this day exactly how the accident happened, but I suspect a piece of wood jammed, kicked back and pulled his hand into the blade. In addition to the initial surgery to repair the tendon, Steve had two more surgeries to remove scar tissue and restore movement. Steve is able to function and work but he still lacks feeling in the injured area of his hand. Because he has no feeling in some areas of his left hand, he must be extremely careful to avoid further injury, as his normal sensory mechanisms are not working.

I implore you to enact legislation that requires safety devices be designed into the manufacture of all new table saws. The technology to do so exists today. Countless injuries, lost time, medical costs and pain/suffering could be prevented or significantly reduced by your actions. I believe that virtually everyone purchasing a table saw in the future would welcome the added safety, even though the cost would be slightly higher. Fingers, hands, thumbs and even lives cannot be replaced!!!

Thank you.

Cordially,

Donald E. Hyson
601 S. Church St.
Winnebago, IL 61088

CC: SawStop, LLC
22409 S.W. Newland Rd.
Wilsonville, Oregon 97070

DAVID S. WRIGHT
Architect & Woodworker

Saw pet

July 27, 2003

Office of the Secretary
Consumer Product Safety Commission
Washington, DC 20207

Subject: Petition CP 03-2, Petition for Performance Standards for Table Saws

Gentlemen,

I am writing to support Petition CP 03-2, Performance Standards for a System To Reduce or Prevent Injuries From Contact With the Blade of a Table Saw. Table saws permanently injure tens of thousands of woodworkers each year, at staggering personal and financial cost to the workers themselves, their companies, families, and insurance companies. The situation has been getting worse as the number of table saws increases and operator training decreases. Today's engineering and manufacturing technology can effectively and economically solve the problem with body contact sensing systems and blade brakes, yielding personal and financial benefits similar to seat belts and air bags in automobiles. Unfortunately, market factors will delay, and possibly even prevent, the availability of this technology. The time has come for CPSC action.

This letter will present the need, technological considerations, why CPSC action is required, and a proposed implementation schedule to require blade brakes on table saws. Instead of repeating information that is already in Petition CP 03-2, I will attempt to offer new information and a personal perspective.

The Need for Table Saw Blade Brakes

The home improvement movement, combined with falling equipment prices over the last 20 years, has put table saws in millions of American homes. Every year hundreds of small cabinet shops start up with little more than several thousand dollars and a warehouse. Most of these home saw owners and professional operators are not properly trained and do not fully understand the risk and severity of injuries.

Table saw safety devices currently provided, such as splitters, anti-kickback teeth, and blade guards are difficult to set up properly and extremely inconvenient to use. They interfere with many operations, frequently having to be taken off and put back on the saw. Almost all saw owners, and the operators in many small professional shop settings remove the safety devices. Television woodworking shows are among the worst offenders. You will not see table saw safety devices used on "The New Yankee Workshop", for example, which is where many Americans learn how to work wood.

49 Laurel Ridge ▪ Greenville, SC 29609 ▪ (864) 246-4066 ▪ dsnw@mindspring.com

I have read a number of table saw injury cases, and believe that Petition CP 03-2 substantially understates the cost per injury. An injury results in a lot more than just medical bills. Many victims are out of work for weeks, months, and even years. Sometimes they have to leave their professions. The impact on their personal lives is profound, particularly in the case of fingers that will stay lost for the rest of the woodworkers' lives.

I am a serious home hobbyist woodworker. Like most woodworkers, I do not use my table saw guards. They are annoying and inconvenient. Frequent on/off cycles rob me of what is already too little shop time. I take a few seconds to pause before every cut, imagine how I might get cut during the operation, and hopefully feed the stock in a manner to prevent accidents. Safe woodworker or idiot? Only time will tell. I am probably a fool to take these risks. I am responsible for my own actions, but what happens when my son is old enough to use the saw? What about when friends spend time in the shop? How about when I sell it to someone else? The only real and enduring solution is for table saws to have integral, automatic, and undefeatable blade brakes to prevent serious injury regardless of the operator's inexperience, lack of training, ignorance of the risks, fatigue, or impairment.

Blade Brake Technology

Do not believe table saw manufacturers who say that blade brakes are not practical. The ones who have tested the sample blade brake invented by Sawstop, LLC have only come up with minor technical issues that are easily solved. Computer chips perform billions of operations per second, plenty fast enough to control a sensing system and blade brake before a finger is lost. Sensing technology? My peak charger can sense the subtle voltage drop that signals a full charge in NiMH batteries; properly designed and programmed sensors can tell the difference between wet wood and human flesh. What about blade brake speed and power? Millions of automotive airbags have already proven that fast, powerful, and effective mechanisms can be reliable and economical.

The petitioners will probably profit from CPSC action. I do not know if it is appropriate for CPSC action to support a patent protected product. Fortunately, I do not think that will be a problem in this situation. Sawstop has patented a simple and effective blade brake design, but table saw manufacturers can come up with other ways to sense body contact and stop the blade. The Petition makes the job easier by calling for lower performance standards than provided by the Sawstop device.

Why the CPSC Must Act

In a perfect world, table saw manufacturers would immediately see the tremendous benefit that blade brakes hold for woodworkers, and bring blade brake equipped models to market in short order. Things have not worked out that well. The table saw business is extremely price competitive. Just a few dollars saved on each saw translates directly into higher sales volume, better retailer margins, and more manufacturer profit. Adding features that increase price without also increasing sales volume can quickly kill a product line. Many of the manufacturers are publicly traded, and under enormous pressure to maximize short term profit and avoid risk. The entire industry moves together, taking baby steps in their product development to reduce risk

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and watching each other closely to see what sells before planning their next baby step. Blade brakes are simply too revolutionary for these companies. Their plan is to stand on the sidelines and let someone else test the market with a blade brake saw. If such a saw came out, and found market success, you can bet that every manufacturer would have one in product development right away.

Safety devices currently offered on table saws are not selected based on effectiveness and convenience; they are the minimum established by legal precedent to protect the manufacturers from liability. How many people do you think would use safety belts if they took two minutes and a wrench to put on before driving, and the same hassle to get out of the car? The fact that woodworkers do not use these flimsy and annoying devices does not bother the manufacturers. It is all about profit per unit sold. They think that safety does not sell more units, but they do not really know this to be true because major advancements in table saw safety were not previously possible.

Quick and effective CPSC action is needed to break the deadlock and protect the American public. Safety did not use to sell cars either. Thanks to Government regulation pushing manufacturers in the right direction, it does now! Tens of thousands of woodworkers will benefit every year – hundreds of thousands over time. Health and liability insurance costs will go down too, bringing economic and competitive advantages to woodworking companies nationwide.

I would like the opportunity to use a blade brake table saw in my shop, and I would rather buy the saw from a major manufacturer with good distribution and support like Delta, Jet, General, or Powermatic. Every woodworker with whom I have discussed blade brakes would like that option. Many contractors and cabinet shop owners I work with daily are safety conscious and would like to be able to buy blade brake saws. I would rather blade brakes come to market without Government intervention, but that is not likely to happen.

A Proposed Implementation Schedule

Blade brakes cannot be required on table saws overnight. Manufacturers need time to develop economical mechanisms. Implementation issues need to be ironed out before the devices are mandatory on all saws. Blade brakes may add a couple hundred dollars to the cost of a saw for the next few years, but the unit cost will drop dramatically over time. I predict that, in the long run, blade brakes will only add $50, or even less, to the cost of a typical table saw. That is pretty cheap insurance for a tool that causes such frequent and horrific accidents.

Blade brakes should first be required on powerful saws used in professional settings. The increased cost will quickly be returned in lower insurance premiums for the woodworking companies. Medium priced table saws should come next, after the technology has improved. Low end table saws should be required to have blade brakes after manufacturing advances and sales volume have lowered the unit cost substantially. I propose the following schedule:

- Starting in 2006, all new table saws with 10" and bigger blades, 3 horsepower or more powerful motors, and with a gross operating weight (including fence and wings) greater than 350 pounds should be equipped with blade brakes as described in Petition CP 03-2.

- Starting in 2009, all new table saws with 10" and bigger blades, 1 1/2 horsepower or more powerful motors, and a gross operating weight greater than 200 pounds should have blade brakes.
- Starting in 2012, all new table saws, regardless of blade size, power, or weight, should be equipped with blade brakes.

Please take care to avoid loopholes in the regulation. Be specific about how horsepower and gross operating weight are measured, and define "table saw" broadly enough to prevent companies from classifying their saws to bypass the regulation. You do not want the days of tilt-top saws to return. My dates offer plenty of time for engineering, testing, retooling, and production of these new generation table saws. They also stretch out far enough to keep the CPSC regulations from turning into a gold mine for individual patent holders.

I appreciate this opportunity to express my opinions on this important matter. Do not hesitate to contact me if there are questions about this letter. For the record, I am not affiliated in any way with the petition filers or any table saw manufacturers. I have no financial interest in this matter.

Best Regards,

David S. Wright

cc: Stephen Gass, David Fanning

49 Laurel Ridge ▪ Greenville, SC 29609 ▪ (864) 246-4066 ▪ dsnw@mindspring.com

Stevenson, Todd A.

From: Laurie &/or Marcia Leonard [lleonar1@maine.rr.com]
Sent: Monday, July 28, 2003 5:35 PM
To: Stevenson, Todd A.
Subject: Petition CP 03-2, Table Saws

Dear Sirs:
I would like to make comments concerning "Petition for Performance Standards for Table Saws" Petition No CP 03-2.
I am an Orthopedic Surgeon and unfortunately have seen a number of injuries from table saws with lost fingers. I have heard of lost hands but fortunately have not had such a patient myself. My son-in-law is a carpenter and he knows of 3 men with missing fingers from table saws. The guards that table saws come with are clunky, difficult to use, get in the way, etc and most table saw owners do not use them.
And so, the Saw Stop mechanism of David Fanning which will stop the spinning blade so quickly that only a minor cut is made is absolutely wonderful! I wish it were on my table saw!
I would propose that such a mechanism be mandatory on all new table saws and would hope that one day they would be an OSHA requirement. We would have many fewer serious hand injuries and I would think that industry would find that it would be actually saving money with lowered insurance and Worker's Compensation costs.
Respectfully,
Lawrence M. Leonard, M.D.
Fellow, American Academy of Orthopedic Surgeons
26 Amerescoggin Rd.
Falmouth, Me., 04105-1523

Saw pet. 30

Stevenson, Todd A.

From: Tim Swartz [tims@wall-goldfinger.com]
Sent: Monday, July 28, 2003 5:00 PM
To: Stevenson, Todd A.
Subject: Petition CP 03-2, Petition for Performance Standards for Table Saws

Comments on: Petition CP 03-2, Petition for Performance Standards for Table Saws

I signed the petition to urge the Commission to establish the standard proposed by Messrs. Gass, Fanning and Fulmer et al because of my long experience in woodworking, and the danger of table saw accidents within the business in which I work.

I have been doing custom woodworking in various settings for over 30 years, as a carpenter, cabinet and furniture maker, and now as a foreman in a shop building corporate boardroom furniture. Throughout my working life, I have shaken the hands of many short-fingered woodworkers who have lost all or parts of their fingers to table saw accidents.

I have known several woodworkers well who have had accidents; I feel it is mostly my good fortune which has kept me from witnessing an accident of this type myself. I have seen the physical and mental suffering these accidents have caused, and the permanent effects which they wreak on the accident victims. None of the people I have known who have had accidents are foolhardy or negligent workers. All of them have been intelligent people whose concentration wavered just a little at the wrong time, and who suffered a major accident as a result. Two of my acquaintances who have lost fingers have been guitar players, who have consequently lost the ability to pursue their musical ambitions as well as losing some capacity to work at their trades.

The table saw is a basic tool, capable of an incredible variety of work, is a central part of virtually all shops, and is often present on carpentry job sites as well. None of the guarding systems I have seen and worked with can prevent any injuries from occurring, and statistics suggest that they never will. The Saw Stop system is an exciting development in table saw safety, which I hope will become an industry standard. The unwillingness of manufacturers to adopt it is testimony primarily to their short-sighted focus on immediate profits, rather than their long-term interests, much less the safety of those who buy and use their products. The ability of this device to limit damage to fingers which come in contact with the blade means that my friends would not have had to suffer the life-changing damage which has been the result of a moment's inattention. It would have made the difference between a visit to the doctor and multiple hand surgeries. It would have made the financial difference between perhaps a $20 co-pay and tens of thousands of dollars of medical care. And it would have meant that both my guitar-playing friends would still be playing. For me, that is the most important way to sum up the difference.

Because of my concern and that of the company for which I work, we were among the first to order a table saw now being produced by Saw Stop, as the only way to get this technology into our workplace. I don't ever want to see one of the accidents which I know have happened to thousands of woodworkers, professional and amateur.

I therefore urge the CPSC to help thousands of woodworkers, now and in the future, by mandating the use of the Saw Stop or similar system as a standard safety device on table saws. I look forward to the expansion of its use on other tools as time goes by, and others see the great increase in safety which this system promises.

Tim Swartz
Woodshop Supervisor
Wall/Goldfinger, Inc.
7 Belknap St. Suite 3
Northfield VT 05663
www.wallgoldfinger.com

7/29/03

tims@wallgoldfinger.com
802-485-6261 ext. 4985

7/29/03

Sar put

July 28, 2003

David A. Fanning
22409 S.W. Newland Road
Wilsonville, OR 97070
(360) 944-7204

Todd A. Stevenson, Secretary
Consumer Product Safety Commission
Washington, D.C. 20207

Re: Petition CP 03-2

Dear Mr. Stevenson:

Enclosed is a letter dated July 24, 2003 from seven individuals who had joined in the above-identified petition. Those individuals now demand that their names, addresses and company name be withdrawn from the petition.

Please let me know if you have any questions.

Sincerely,

David A. Fanning

C: Edward Choi, Pak Hiu Sink, Ivan Choi, Keith Chan, Marco Tong, Shirley Lau, FungWing Man

July 24, 2003

SawStop, LLC
22409 SW Newland Road
Wilsonville, OR 97070

Attention: Mr. Renee Knight

Fax: 503-638-6201 Total Pages: 1

Dear Sir,

After reviewing Petition CP 03-2, Requesting Performance Standards for a System to Reduce or Prevent Injuries from Contact with the Blade of a Table Saw - Parts 1 and 2 (0841) currently available on the U.S. Customer Product Safety Commission website: http://www.cpsc.gov/library/foia/foia03/petition/peti.html, we, the undersigned, were shocked to learn that our personal points of view was misinterpreted as that of our company, UL International Limited.

We, the undersigned, are hereby expressing our great disappointment and objection to your unauthorized act to associate our names with the company name that we work for.

As a result, we demand for an immediate and unconditional removal of our names, our company name and addresses tabulated below from the petition that we have submitted in April, 2003 and any public statements regarding SawStop.

Should you have any questions, please feel free to contact the undersigned at

(Phone) +852 9301 9103, or
(Email) 03427105g@polyu.edu.hk

Address as shown in Index of Petitioners for Petition to Initiate Rulemaking for Table Saws:
18th Floor, Delta House, 3 On Yiu Street, Shatin, NT, Hong Kong

Names as shown in Index of Petitioners for Petition to Initiate Rulemaking for Table Saws:

CHOI, Edward _____

SINK, Pak Hiu _____

CHOI, Ivan _____

CHAN, Keith _____

TONG, Marco _____

LAU Shirley _____

MAN, Fung Wing _____

July 28, 2003

David A. Fanning
22409 S.W. Newland Road
Wilsonville, OR 97070
(360) 944-7204

Todd A. Stevenson, Secretary
Consumer Product Safety Commission
Washington, D.C. 20207

Re: Petition CP 03-2

Dear Mr. Stevenson:

Enclosed is a signature of B. Thomas Harter, MD, who wishes to join in the above-identified petition. Please let me know if you have any questions.

Sincerely,

David A. Fanning

I join in the preceding petition under 5 U.S.C. §553(e) and 15 U.S.C. §2058(i) to initiate rulemaking for table saws.

Signature: B. Thomas Harter MD

Name: B Thomas Harter MD

Date: 4/7/03

Address: 225 Abraham Flexner Way

Louisville, Ky

Telephone: 502-561-4239

Fax 3/6

September 4, 2003

David A. Fanning
22409 S.W. Newland Road
Wilsonville, OR 97070
(360) 944-7204

Todd A. Stevenson, Secretary
Consumer Product Safety Commission
Washington, D.C. 20207

Re: Petition CP 03-2

Dear Mr. Stevenson:

Enclosed is the signature of Wayne A. Kulesza who wishes to join in the above-identified petition. Please let me know if you have any questions.

Sincerely,

David A. Fanning

I join in the preceding petition under 5 U.S.C. §553(e) and 15 U.S.C. §2058(i) to initiate rulemaking for table saws.

Signature: Wayne A. Kulesza

Name: WAYNE A. KULESZA

Date: 8/18/03

Address: 8412 ASHWOOD DR.

RALEIGH NC.

MODEL MAKER / PATTERN MAKER

Telephone: 1-919-661-6774

college of architecture and landscape architecture

cala umn

workshop

Kevin Groenke – Manager
139 Rapson Hall
89 Church Street
Minneapolis MN 55455
612 624 9093
612 624 5743 fax
archshop@umn.edu

Saw comm 32

Office of the Secretary
Consumer Products Safety Commission
Washington, DC 20207

August 1, 2003

Petition CP 03-2
Petition for Performance Standards for Table Saws

To Whom it May Concern:

I submit this letter in support of petition CP 03-2 "Petition for Performance Standards for Table Saws". In 1987 I had 2 fingers on my right hand amputated while operating a table saw as a student employee at the University of Minnesota. Although I was fortunate that my fingers were successfully reattached, I have lost the function of two knuckles, and sustained permanent nerve damage and reduced circulation. Aside from the medical expenses paid by my insurer, I received a Workman's Compensation settlement and suffered a significant loss of work time. Had I pursued litigation I believe I would have received a much larger settlement against the University. This injury and countless others could have easily been prevented had manufacturers of table saws made a greater effort to design and incorporate effective safeguards to prevent such injury.

Since 1994 I have managed a student workshop in the College of Architecture and Landscape Architecture at the University of Minnesota. Each and every time a table saw is turned on, I fear that what happened to me may happen to one of our student users. Over the past 12 months our 3 table saws have been used for over 3,000 hours by more than 300 different users. We have been extremely fortunate that no serious injuries have been sustained by users of our table saws We employ every possible safeguard when operating the table saws in our facility. The most effective guards and other safety devices are installed on our machines and used whenever appropriate Every user is trained in the use of the equipment and directly supervised until they demonstrate that they understand and follow safe operating procedures. Despite all of these safeguards, a significant risk of mishap and injury exists every time a tablesaw is used. I believe that until a table saw incorporating an effective, fail-safe system to prevent injury is available, a serious injury to one of our users is an unavoidable eventuality. Our saws are only 3 of countless thousands across the country, each of which have the same potential for causing injury.

By my observation, little effort has been made by manufactures to reduce the inherent danger of the table saws they produce. The guards, splitters, anti-kickback devices and other safety devices provided with most table saws manufactured today are ineffective, poorly designed and usually removed by the end user of the equipment. After-market devices offer a greater degree of safety but, due to cost prohibitions, they are installed on a small percentage of machines in use. Table saws are responsible for a majority of serious woodworking machine injuries simply because the manufacturers of the machines have failed to provide adequate safeguards.

Incorporation of a device to detect user contact with a tablesaw blade and instantaneously stop and/or retract the blade would exponentially reduce the inherent risk of personal injury while using a table saw. If such a system is demonstatably effective I believe that it is the moral responsibility of manufacturers of table saws to incorporate it on every table saw they produce. To date saw manufacturers have failed in their moral responsibity to provide the safest product that is reasonably possible.

Sincerely

Kevin J. Groenke

11455 N Antelope Lane
Parker CO 80138

August 4, 2003

Office of the Secretary
Consumer Product Safety Commission
Washington DC 20207

Subject: Petition No. CP 03-02

Dear Sir or Madam:

I wish to provide comments on the subject petition entitled "Petition Requesting Performance Standards for a System To Reduce or Prevent Injuries From Contact With the Blade of a Table Saw."

I have followed the development of technology to minimize the injuries an operator may sustain if he/she accidentally encounters the spinning blade of a table saw. I am very impressed with the progress made and anxiously await the marketing of this technology. Two of my very close friends had mishaps with table saws, both of which would have resulted in very minor, if any, injuries had they had access to this technology. Instead, both individuals had extensive reconstructive surgery done on their injured hands and suffered much pain and discomfort.

I discussed this technology with the members in attendance during one of our Woodworking Guild meetings. When I mentioned the insignificant injury that may result when an individual encounters a spinning saw blade equipped with this technology, I was impressed with the comments that came from the audience. One individual said he had no estimate of the real cost as he suffered permanent loss of fingers. A second said his medical bill was $12000.00. There were several other similar comments. It was disturbing to learn of the number of individuals that had saw-related mishaps. A table saw equipped with this technology can be purchased for less that $3000.00! A very minor cost considering the alternative.

I encourage the Consumer Product Safety Commission to view Petition No. CP 03-02 very favorably and keep in the forefront the many individuals who have needlessly suffered or are currently suffering because this technology was not available at the time of their mishap. This technology should be made available to the consumer by all manufacturers marketing table saws within the United States. This provides the consumer the greatest flexibility when purchasing a saw.

Thank you for taking time to review my comments regarding this very important petition.

Sincerely,

Del D Fussell

Del D Fussell

Saw 34

Stevenson, Todd A.

From: Kerry Gough [kerrygough@mindspring.com]
Sent: Tuesday, August 05, 2003 5:50 PM
To: Stevenson, Todd A.
Subject: Petition Requesting Performance Standards for Table Saws, No CP 03-2

August 5, 2003

Todd A. Stevenson
Secretary
Consumer Product Safety Commission
Washington, D.C. 20207
By email only to cpsc-os@cpsc.gov

Re: Petition No. CP 03-2—Petition for Performance Standards for Table Saws

Dear Secretary Stevenson:

I whole heartedly support the petition referenced above. My son, Matthew Gough, injured his left hand v operating a Skil Table Saw. Had the saw been equipped with the Saw Stop or a similar device, his injuri have been minimal.

However, in the absence of a safety device such as Saw Stop, Matthew suffered severe injuries to three fi on his left hand. Rushed to the emergency room, the physicians and surgeons performed an open reducti with internal fixation of the index and middle finger phalanx fractures, extensor tendon repairs of the thu index and middle fingers and digital nerve explorations of the same digits. While healing is progressing he will never regain full motion of these digits and will have residual numbness and neuro-vascular injuri the affected digits as well.

The proximal tip of the middle finger does not show adequate signs of mending and a plate may be required. In addition, damage to the nerves has resulted in numbness in the distal phalanxes of the middle and index fingers, on the thumb side.

The medical bills incurred as a result are as follows:

Provider	Date	Amount
California Shock Trauma Air Rescue	3/9/03	10,407.20
American Medical Response	3/9/03	803.08
U.C. Davis Physicians Services	3/9-3/21/03	9,633.00
U.C. Davis Hospital Services	3/9-3/11/03	56,024.00
UCDMC Pharmacy	3/11/03	53.50
Raley's Drug Centers	3/14/03	81.97
Hand Therapy	April--present	1,000.00
		78,002.75

Matt's accident is not an unusual one. There are many, many similar injuries each year—all of which could be prevented with the adoption of the kind of safety device proposed by the petition.

I urge the CPSC to adopt the standards set forth in the petition.

Very truly yours,

Kerry M. Gough
Discrimination and Harassment Stop Here!

Visit Us at goughlaw.com

kerrygough@mindspring.com
Gough & Company, Counselors at Law
160 Franklin Street, Suite 200
Oakland, CA 94607

510 832 5800

Stevenson, Todd A.

Gov comment 86

From: Bernie [bernie@bessette.com]
Sent: Thursday, August 07, 2003 8:17 PM
To: Stevenson, Todd A.
Subject: Petition CP 03-2 Performance Standards for Table Saws

Having had a friend cut off four fingers on a table saw last summer, I believe that a performance standard such as the one proposed is a valuable safety standard.

Please mail a copy of the petition to:
Bernard J. Bessette
1306 Forest Hill Dr. SW
Aiken, SC 29801

Thank you,

Bernie Bessette

Gary

36

Stevenson, Todd A.

From: Aaron Moore [AMoore@ll-a.com]
Sent: Tuesday, August 12, 2003 8:46 AM
To: Stevenson, Todd A.
Subject: Table Saw Petition CP 03-02

To whom it may concern,

I am strongly against setting a performance standard requiring a table saw blade to stop when you touch it. This will raise the cost of table saws by $500 - $1000. I am for safety, but this is overkill. To double the price of the most expensive tool in most woodworking shops is just too much. This is the reason the SawStop people who filed the petition couldn't sell it to anyone. Please do not let them use the CPSC to force on us a (patented) product that they could not sell in the marketplace.

I am for setting standards requiring a more useful splitters and blade guards which would be a big step towards reducing injuries but would not be prohibitively expensive. The problem with current splitters and blade guards is that they are (a) impossible to use for certain cuts and (b) cumbersome to remove and replace, so that they are removed by the user to make certain cuts and then never replaced. There are splitter/guard arrangements that are affordable and do not have these shortcomings.

Thank you.
Aaron W. Moore
423 South Street
Holliston, MA 01746
508-429-1602

Northfield FOUNDRY & MACHINE CO.

320 North Water Street
P.O. Box 140
Northfield, Minnesota 55057

Phone: (507) 645-5641
Fax: (507) 645-4005
E-mail: northfield@rconnect.com

Saw comments

August 12, 2003

2003 ... OFFICE OF THE SECRETARY 11:22

Saw Stop LLC
22409 SW Newland Rd
Wilsonville OR 97070

Dear Sirs:

In response to your article featured in Woodshop News Magazine, we are one of the manufacturers that witnessed your demonstration of your stopping device at the Atlanta Woodworking Machinery and Furniture Supply Fair in Atlanta, Georgia. We also conversed with you about applications of your Saw-Stop in connection with our line of machinery. At that time you had nothing that would function on anything but a light duty belt driven contractors saw. The device you have seems to work only on certain machinery with certain conditions and therefore doesn't work on all saws. Your statement about manufacturers changing their existing machines to fit your stopping device, only tells me that you are unaware of the conditions and usage under which saws of this type are used.

The following are some of the problems that are a concern pertaining to your device.

1) The demonstration you used consisted of a "hot dog" simulating a finger moving toward the spinning blade. The demo however, is far from reality. End users of table saws do not move material through saws at a creep speed as demonstrated, but more often 10 fpm to 20 fpm maximizing their production, as all saws are not used in a home shop environment.

2) Generally small contractors or hobbyist saws are belt driven, therefore being able to utilize your concept. But there are thousands of direct drive units sold that can't electronically isolate their saw arbor shaft, making it impossible for your device to function, as we know it.

In the field, many end users use different cutting tools such as size of blades, dado sets, cutting heads, molding heads; were these considered when in the engineering stage?

Many of the saws used today cut nonferrous metals. Would contact with the blade cause false tripping. In the field of up-cut saws, where blade sizes are used from 10" to 32" and up to 15 HP, this total mass of the blade and the motor armature could reach 50#s. I foresee a problem stopping and dropping the saw out of the way as this system works. There is a high possibility that this might cause the blade breakage and flying metal parts.

When the blade cartridge fires, the inertia of the blade, belt driven system and motion coming to a halt caused a pin to shear, driving the blade sub-table. So it is the action of the blade stopping and dropping below the table that is the crux of the Saw Stop System. However, heavy duty saw tables, radial saws and up-cut saws do not lend themselves adaptation of this criteria, or it would change the total concept of the machine.

It seems the inventor had a very good idea, but it has limited usage.

Sincerely,

Northfield Foundry & Machine Company Inc

John P Machacek, CEO

cc US Consumer Product Safety Commission

SawStop petitions government to mandate safety device

Manufacturers are dragging their heels, so the government should intervene, says SawStop

By Tod Riggio
ASSOCIATE EDITOR

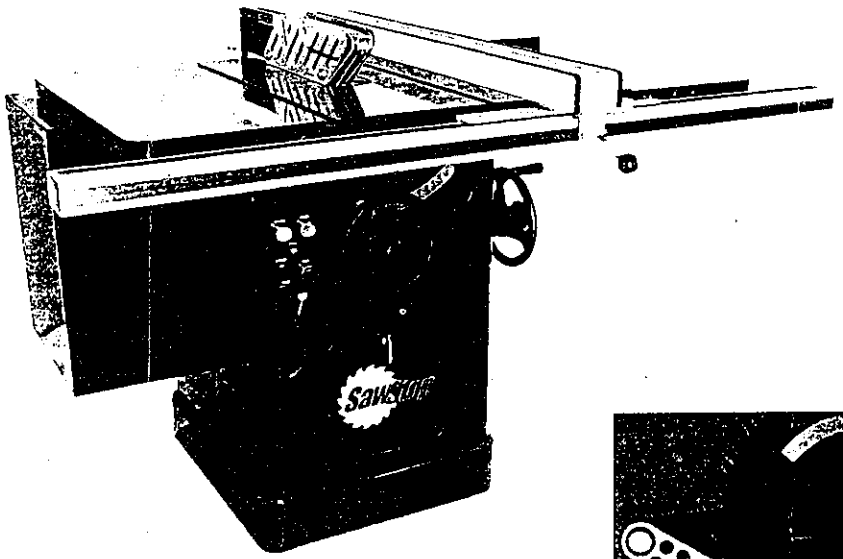
The inventors of the SawStop safety device are petitioning the U.S. Consumer Product Safety Commission to initiate a rulemaking process which would ultimately require table saw manufacturers to include SawStop's device, or one similar to it, on their products.

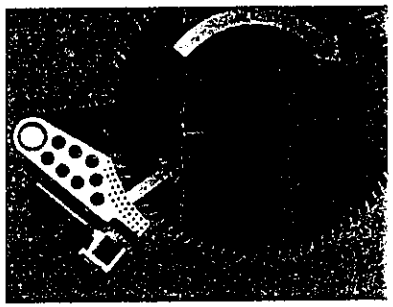
The petition is a last resort of sorts.

SawStop introduced its device at the 2000 International Woodworking Machinery and Furniture Supply Fair in Atlanta. The inventors claim they have since demonstrated their technology to almost every major saw manufacturer with no takers. They charge that manufacturers are looking for excuses not to adopt the technology, rather than looking for ways to implement it.

"We definitely have gotten fed up with the manufacturers' resistance to doing anything," said SawStop president Stephen Gass. "If they were doing their own design, that's fair. But to do nothing and try to suppress the technology is wrong. If even one manufacturer had done this on a product, I wouldn't have been inclined to file a petition."

SawStop's device promises to reduce the seriousness of table saw accidents, and perhaps even prevent the loss of fingers. It recognizes the electrical properties of what is being cut, and stops the saw blade whenever it comes into contact with conductive material — namely the user's hand. A triggered device releases a spring that pushes a pawl made of aluminum into the teeth of the blade, thereby stopping the blade. The action of stopping the blade causes the blade to retract and drop below the table. The system also interrupts power to the motor when the system detects accidental contact. Stopping and retracting the blade happens within about 2 to 5 milliseconds, according to SawStop.





At last summer's IWF Fair in Atlanta, SawStop took pre-orders for this 10" cabinet saw, as well as a 10" contractor's saw; the SawStop safety device works with a spring that releases an aluminum pawl into the blade, which then stops and drops below the table.

Manufacturers would have to redesign their saws to include this device. And retail prices are expected to increase by at least $100, according to the most conservative estimates. Retrofit kits are not currently an option.

SawStop is trying to produce its own saw with pre-orders for 250 cabinet saws and 100 contractor saws. But an agreement with a Taiwanese manufacturer has not been finalized.

SawStop states that saw manufacturers have raised two specific issues upon examination of a prototype safety device: The reaction system could be made to fire when cutting very wet or green wood, and the brake cartridge was not sealed against sawdust and could therefore malfunction. SawStop says both issues have been resolved.

A third issue suggested by some manufacturers is that the device will promote carelessness by users, thus making the saws more dangerous, according to Gass. "That's a lawyer's argument," he said. "It's just an excuse not to go forward."

The petition had more than 300 signatures in April and was about to be filed. According to Gass, the petition did not require any signatures but was e-mailed to people on the company's mailing list for a reaction.

Some respondents have questioned whether SawStop's motives are purely financial, since it could stand to profit from such a rule.

"It's sort of a personal attack that has no logical merit," said Gass. "If I wasn't involved in SawStop, I probably wouldn't just out of the blue file this petition. Having said that, who else is going to do it? Really, I think it's the wrong question. The question should be is it right, or is it wrong?

"I spend my days doing this in part in hopes of earning a good return on it, but also because it's the right thing to do. It's a good thing for woodworkers, and it's a good thing for society as a whole to not have people having those kinds of injuries. Ultimately I don't want to go to a trade show five years from now and have some kid show me his mutilated hand, and say why didn't you do everything you could to get this out there?"

The rulemaking process includes product testing, review by CPSC staff and public comment. It can takes months or years, depending on what complications arise, and on new regulations or changes that can occur at any step. It may also drive a deeper wedge between SawStop and the manufacturers, Gass acknowledged.

"I don't know how much more ticked off they can be at us," he said. "We've created a problem for them and they've told us that.

"I think it's likely [the CPSC] won't grant the petition right now, but at least I've done what I can."

Contact: SawStop LLC, 22409 S.W. Newland Road, Wilsonville, OR 97070. Tel: 503-638-6201. Fax: 503-638-8601.

Saw comment

37

Stevenson, Todd A.

From: AL6449@aol.com

Sent: Wednesday, August 13, 2003 12:37 PM

To: Stevenson, Todd A.

Cc: peterdav@microsoft.com

Subject: CP 03-2

Driving a car has the potential of harming self, others. Operating a table saw, sewing machine, router or any other Power device does have the potential to harm yourself and others. They are not designed to be operated by children and you have to make yourself aware of the dangers. I am completely at odds with This proposal.

Al Davidson
al6449@aol.com

Saw comm

Stevenson, Todd A.

From: Nolan, Jeffrey [jeffrey.nolan@sap.com]
Sent: Wednesday, August 13, 2003 1:32 PM
To: Stevenson, Todd A.
Subject: Petition CP 03-2, Petition for Performance

I would prefer that you not issue standards for tables saws in the form that has been suggested by the petition. This is clearly an attempt by a single manufacturer, Sawstop, a company whose principles are the lead petitioners, to have their products become mandatory on competitor products. To mandate these products would have the effect of creating a dangerous monopoly, and that is neither the intent nor spirit of the commercial code.

A tablesaw is inherently dangerous and manufacturers ship these machines with appropriate safety equipment. That users disable or misuse the equipment and then hold the manufacturer responsible is analagous to regulating the automobile manufacturing industry because some drivers will operate their products while under the influence of alcohol or drugs. What is next, putting breath analyzers in cars?

Regards,
Jeff Nolan

Jeff Nolan 650.849.2624
SAP Ventures
Exec Asst: Kathy Finch, 650.849.4043

http://sapventures.blog-city.com/

Stevenson, Todd A.

Sam

From: Mike Moskau [MMoskau@co.jefferson.co.us]
Sent: Wednesday, August 13, 2003 4:56 PM
To: Stevenson, Todd A.
Subject: Petition CP 03-2, Petition for Performance Standards for TableSaws

Dear Sir/Madam,

I am for this petition. A system for preventing injury from a table saw blade is a good idea. I have been waiting for a product like this to come on the market in order to protect employees from severe injury while using a table saw. Thank you for the opportunity to voice my opinion for a safer work place.

Saw

41

Stevenson, Todd A.

From: STEVEN BONEY [sjb6@prodigy.net]
Sent: Thursday, August 14, 2003 9:31 PM
To: Stevenson, Todd A.
Subject: Petition CP 03-2, Petition for Performance Standards for Table Saws

To whom it may concern:

I wish to voice my opposition to Petition CP 03-2, Petition for Performance Standards for Table Saws.

Our government does not need to enforce the use of said table saw safety devices. Table saw users and consumers should retain the sole right to determine what safety equipment is adequate for use on any table saw they purchase and use.

Sincerely,

Steven Boney
1694 Meadows Lane
Luxemburg, WI 54217

8/15/03

Saw

42

Stevenson, Todd A.

From: vze1y5sp [mark.allen104@verizon.net]

Sent: Saturday, August 16, 2003 11:53 PM

To: Stevenson, Todd A.

Subject: Petition CP 03-2, Petition for Performance

I feel that this petition should be turned down. Look on Woodnet form www.woodnet.com and you can see Steve Gass discussing his product. Let's face it this petition was not filed with safety in mind, but profit for one company. If safety is a concern there are other cheaper and tested ways to make a table saw more safe.

mark allen

Gas

Stevenson, Todd A.

From: vze1y5sp [mark.allen104@verizon.net]
Sent: Sunday, August 17, 2003 10:56 PM
To: Stevenson, Todd A.
Subject: Petition CP 03-2, Petition for Performance

The above mentioned petition filed by Gass, Fanning, and Fulmer, et al is an attempt to have the commission establish national guidelines based upon patents held by the petitioners. To do so would in effect be mandating the use of their patented technology. The petitioners state they have approached all of the manufacturers of table saws with licensing proposals and have been rejected. Without a response from those manufacturers one can only speculate on the basis for such rejection.

Although there is potential for significant savings in human terms, there is also tremendous financial gain to be made by the petitioners. The product has only been demonstrated by a "single prototype" for a period of 6 months, according to Gass as recently as today (August 16). The technology, though seeming somewhat promising, has yet to undergo any formal comprehensive testing program as might be required by responsible underwriting institutions.

In light of the potential for tremendous financial gain on the part of Gass, Fanning, and Fulmer, et al and in the absense of proper testing and evaluation by nationally recognized, independent testing agencies I strongly urge the commission reject the petition.

Mark D. Allen
1012 18th St
#8
Vienna, WV 26105

8/18/03

Saw #3

Stevenson, Todd A.

From: Pat [patricks@ywave.com]
Sent: Sunday, August 17, 2003 3:33 AM
To: Stevenson, Todd A.
Subject: Petition CP 03-2, Petition for Performance Standards for Table Saws

Petition CP 03-2, Petition for Performance Standards for Table Saws

I believe the costs estimated for manufactures to redesign tablesaws to include Saw Stop is considerable underestimated based on the following posts by Steve Gass - Inventor and President of SawStop located here:

http://www.forums.woodnet.net/ubbthreads/showflat.php?Cat=&Board=UBB2&Number=596526&page=0&view=collapsed&sb=5&o=&fpart=all

I suggest you ask the major makers of tablesaws how much it would cost to include Saw Stop.

I am against requiring Saw Stop to be installed on new saws.

Thank you,
Patrick Sariego
15609 Scenic Shores Dr.
Yelm, Wa. 98597
360-894-0505

Petition Requesting Performance Standards for a System to Reduce or Prevent Injuries from Contact with the Blade of a Table Saw

CC 03-1-59	10/24/03	C. Johnson Secretary-Treasurer	Compressed Air and Gas Institute 300 Summer Ave. Cleveland, OH
CC 03-1-60	10/26/03	Ed. Johnson	King George, VA E760@aol.com
CC 03-1-61	11/05/03	Stephen Gold Vice President	National Association of Manufacturers 1331 Pennsylvania Ave,NW Suite 600 Washington, DC 20004
CC 03-1-62	11/06/03	Daniel Lanier	Power Tool Institute Inc 10 Light Street Baltimore, MD 21202
CC 03-1-63	10/24/03	T. Duesterberg President & CEO	Manufacturers Alliance/ MAPI 1525 Wilson Blvd. Suite 900 Arlington, VA 22209
CC 03-1-64	11/24/03	Stephen Gass David Fanning James Fulmer	22409 S.W. Newland Rd Wilsonville, OR 97070
CC 03-1-65	11/25/03	Robert Morris	12504 Colby Dr. Woodbridge, Va 22192
CC 03-1-66	12/02/03	Rick Baker	1721 S.W. 30th St. Topeka, KS 66611