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Mr. W. Jeff Keirns
Chairman, Consumer Safety
Glazing Committee
Suite 505
1000 Connecticut Avenue, N. W.
Washington, D. C. 20036

Dear Mr. Keirns:

This letter is in reply to Mr. Zeolla's correspondence of September 4, 1974, in which he indicates that Consumer Safety Glazing Committee must determine whether to (1) Performance test glazed products, or (2) Performance test the glazing material outside of glazed product.

He requested advice on whether alternative (2) would be acceptable to the Commission if a correlation between methods (1) and (2) can be established.

It is the Commission's view that issues affecting the provisions of a standard which arise during the development period for the standard must be resolved by the offeror. The Commission does not view the offeror process as a contractual proceeding whereby an offeror develops a standard in accordance with Commission specifications. Rather, it is the responsibility of the offeror to draft a recommended standard that will address the hazards identified and eliminate or reduce the unreasonable risk of injury presented by the consumer product under consideration.

ADVISORY OPINION

Thus, the Commission believes that Consumer Safety Glazing Committee must make the determination whether to include performance testing of glazed products, or performance testing of the glazing material outside of the glazed product in the standard it is developing. In any event, you are expected to justify, in your submission of a recommended standard to the Commission, various alternatives selected and resolution of issues which arise during the development proceedings.

Sincerely,

Original signed by
David Schmeltzer

Michael A. Brown
General Counsel

CONSUMER SAFETY GLAZING COMMITTEE
NATIONAL HEADQUARTERS, SUITE 505, 1000 CONNECTICUT AVE. N.W., WASHINGTON, D.C. (202) 296-0797

M. N. Zeolla
Architectural Glass Project Mgr.
One Gateway Center
Pittsburgh, Pa. 15222
412/434/3315

4 September 1974

Dr. Alan Ehrlich
Project Monitor
Consumer Product Safety Commission
Washington, D.C. 20207

RE: ARCHITECTURAL SAFETY GLASS PROJECT

Dear Dr. Ehrlich:

In the area of performance tests and test procedures to be incorporated in the architectural glass standard that will evolve in the development project, we are confronted with two alternatives:

(1) Performance testing of glazed products, or

(2) Performance testing of the glazing material outside of the glazed product.

In my opinion, requiring testing of (1) in a standard would appear to present serious problems principally from the standpoint of practicality and economics.

If correlation between methods (1) and (2) can be established would incorporating method (2) in the standard be acceptable to the CPSC?

Your answer would be of great assistance.

Sincerely,

M. N. Zeolla
Project Manager

MNZ/cs