U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

Caroleene Paul
Mechanical Engineer
Division of Mechanical Engineering
Directorate for Engineering Sciences

Tel: 301-987-2225
Fax: 978-367-9122
Email: cpaul@cpsc.gov

September 20, 2021

Mr. John Stimitz
UL LLC
1285 Walt Whitman Road
Melville, NY 11747-3081

Dear Mr. Stimitz:

Staff of the U.S. Consumer Product Safety Commission (CPSC) requests that UL consider the available incident data on table saw injuries to evaluate the effectiveness of the latest revisions to the voluntary standard for table saws in reducing blade-contact injuries.

In December 2019, Underwriters Laboratories Inc. (UL) deleted requirements specific to table saws from UL 987 *Stationary and Fixed Electric Tools* because the requirements had been superseded by the first edition of UL 62841-3-1, *Electric Motor-Operated Hand-Held Tools, Transportable Tools And Lawn And Garden Machinery – Safety – Part 3-9: Particular Requirements For Transportable Table Saws* (published on August 29, 2016 and effective August 29, 2019). [1] In 2005 and 2007, table saw requirements in UL 987 were revised to include a riving knife and modular blade guarding system, respectively, and since 2010 table saws have been manufactured with this latest guarding system intended to reduce blade contact injuries. The riving knife and blade guard requirements in IEC 62841-3-1 are essentially equivalent to the requirements in UL 987 and is currently in effect.

CPSC staff performed trend analyses for the number of blade-contact injuries, amputations, hospitalizations, and finger/hand injuries that were reported through the National Electronic Injury Surveillance System (NEISS) from 2004 to 2018.[2] This includes the 2004 to 2009 timespan before the table saw were manufactured with the new riving knife and modular blade guard requirements and the 2010 to 2018 timespan after the new requirements became effective on all table saws.

[1] The comments in this letter are those of the CPSC staff and they have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.
[2] Table Saw Update 2019, retrieved from: Table Saw 2019 Update ballot vote (cpsc.gov)

No trend was detected in the analysis of table saw blade-contact injuries or any of the injury severity analyses for amputations, hospitalizations, and finger/hand injuries. Staff also conducted a trend analysis to include the rate of injury per 10,000 table saws in use for each year in the analysis. The analysis found no discernible change in the risk of injury associated with blade contact related to table saws from 2004 to 2018.

If the latest revision of the voluntary standard was impacting the number or severity of injuries, staff would expect a steady decrease in the number of injuries or severity of injuries as the proportion of compliant table saws increased. This was not observed in the trend analyses conducted by staff.

CPSC's website offers two online tools to query incident data:

1) The National Electronic Injury Surveillance System (NEISS) tool:

CPSC NEISS On-Line Query System | CPSC.gov

The CPSC operates a statistically valid injury surveillance system known as the National Electronic Injury Surveillance System (NEISS). NEISS data from the most recent 20 years are available online and the NEISS Query Builder can be used to view and download national product injury estimates based on customized search criteria.

2) The Clearinghouse Online Query Tool:

CPSC Clearinghouse On-Line Query System | CPSC.gov

In addition to the NEISS query tool on the CPSC website, the Clearinghouse Data tool allows searches of the non-NEISS data that is collected by CPSC. This includes: death certificates, medical examiner and coroner reports, injury reports from news sources or the CPSC's SaferProducts.gov site, and other news services.

CPSC staff encourages UL to analyze the table saw incident data to evaluate the effectiveness of the latest revisions to the voluntary standard for table saws in reducing blade-contact injuries and take steps to reduce the risk. This is particularly important given the increase in injuries associated with power home workshop saws during the COVID pandemic[3]. If you have any questions or comments, please feel free to contact me.

Sincerely,

cc: Jacqueline Campbell, CPSC Voluntary Standards Coordinator

[3] https://cpsc-d8-media-prod.s3.amazonaws.com/s3fs-public/Covid-19-and-final-2020-NEISS-estimates-March-December-6b6_edited20210607_0.pdf