

**LOG OF MEETING  
DIRECTORATE FOR ENGINEERING SCIENCES**

SUBJECT: Dimension saws – Meeting requested by the European Federation of Woodworking Machinery Manufacturers (EUMABOIS) to discuss dimension saws.

DATE OF MEETING: September 18, 2018

PLACE OF MEETING: WEB-EX

LOG ENTRY SOURCE: Caroleene Paul, ESME

COMMISSION ATTENDEES: See attached attendance list

NON-COMMISSION ATTENDEES: See attached attendance list

SUMMARY OF MEETING:

EUMABOIS representatives reviewed points submitted in writing to CPSC staff in letter dated April 27, 2018 (attached):

- Suggestion to clearly define “dimension saws” in accordance with ISO 19085-5:2017.
- Suggestion that proposed rule not apply to dimension saws.
- Description of dimension saws as “professional machines” that range in price from \$4,000 to \$60,000, and require a large footprint to operate.

CPSC staff asked for marketing materials related to dimension saws.

EUMABOIS representative stated that proposal for active injury mitigation (AIM) system was not clear in reliability and test method. CPSC staff recommended that EUMABOIS send in written comment regarding proposed rule.

MEETING ATTENDANCE RECORD  
EUMABOIS/ CPSC Staff – September 18, 2018

COMMISSION ATTENDEES:

Name		Phone	Email
Vince	Amodeo	301-504-7632	<a href="mailto:vamodeo@cpsc.gov">vamodeo@cpsc.gov</a>
Jason	Goldsmith	301-987-2569	<a href="mailto:jgoldsmith@cpsc.gov">jgoldsmith@cpsc.gov</a>
Hyun	Kim	301-504-7632	<a href="mailto:hkim@cpsc.gov">hkim@cpsc.gov</a>
Mark	Kumagai	301-987-2234	<a href="mailto:mkumagai@cpsc.gov">mkumagai@cpsc.gov</a>
Caroleene	Paul	301-987-2225	<a href="mailto:cpaul@cpsc.gov">cpaul@cpsc.gov</a>
Tim	Smith	301-987-2557	<a href="mailto:tsmith@cpsc.gov">tsmith@cpsc.gov</a>

NON-COMMISSION ATTENDEES:

Name		Organization	Email
Jody	Allen	Woodworking Machinery Industry Association (WMIA)	<a href="mailto:jallen@wmia.org">jallen@wmia.org</a>
Iuri	Betti	SCM Group	<a href="mailto:iuri.betti@scmgroup.com">iuri.betti@scmgroup.com</a>
Bruce	Rosenthal	SCM Group	<a href="mailto:brosenthal@scmgroup.com">brosenthal@scmgroup.com</a>
John	Stimitz	UL LLC	<a href="mailto:john.stimitz@ul.com">john.stimitz@ul.com</a>

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Members:  
FMIM - SVDSZ - SMT - TECHNOLOGY INDUSTRIES OF FINLAND - SYMOP - VDMA - ACIMALL - DROMA - AIMIAP - UNIMAP - DREVMASH - ZSDSR -  
AFEMMA - IIBT

2018 April 27

To: U.S. Consumer Product Safety Commission  
Directorate for Engineering Sciences  
5, Research Place, Rockville, MD 20850

Caroleene Paul  
[cpaul@cpsc.gov](mailto:cpaul@cpsc.gov)

**Subject: Document CPSC-2011-0074 regarding the regulatory options for table saw**

Dear Mrs. Paul,

EUMABOIS is the European Federation of National Associations of woodworking machines and tools manufacturers. The federation represents over 850 companies in the woodworking industry with a total turnover exceeding 6 billion euro, and includes the two biggest Associations, German VDMA and Italian ACIMALL – which means more than 60% of world production of woodworking machines.

EUMABOIS represents companies that also produce “dimension saws”, regularly exported to the United States. The “Proposed Rule” could have an important impact for them and it is just for this reason that EUMABOIS has analyzed this document very carefully.

We know that public comments will be accepted only after the results of the ongoing study by CPSC that will be published in the Federal Register next August 1, but, if possible, we would like to open a direct communication channel between us since now.

Our **first suggestion** is to add in the “Proposed Rule” a clear definition for “dimension saws”, directly taken from the new ISO 19085-5:2017 “Woodworking machines — Safety —Part 5: Dimension saws” that is just the specific international safety standard for these type of table saws.

**3.1**

**dimension saw**

hand-fed machine fitted with a single main circular saw blade, which is fixed in position during the cutting operation, and a sliding table adjacent to the saw blade

Note 1 to entry: An example and the terminology are given in [Figure 1](#).

Note 2 to entry: The main saw blade is mounted on a spindle below the table.

Note 3 to entry: It is possible to operate the machine from two possible workplaces (see [Figure 3](#)).

Note 4 to entry: The machine may have any of the devices/additional working units listed in the scope.

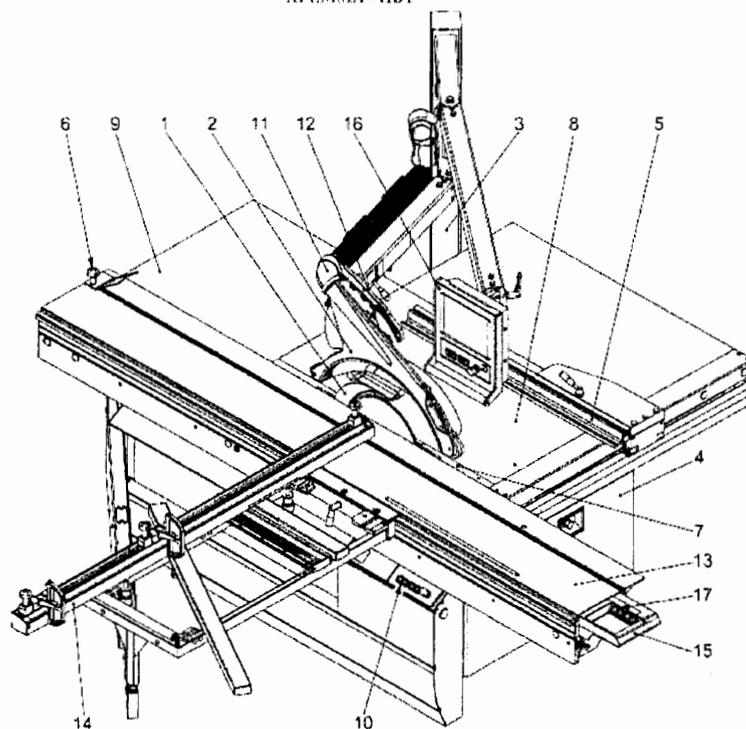
European Federation  
of Woodworking Machinery Manufacturers

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Centro Direzionale Milanofiori - 1<sup>a</sup> Strada Palazzo F3 - I - 20090 Assago (MI) - Tel. ++39-02-89210200 - Fax ++39-02-8259009  
[www.eumabois.eu](http://www.eumabois.eu) - [info@eumabois.com](mailto:info@eumabois.com)

Registered office: Diamant Building - 5<sup>e</sup> Floor - Bld Reyer, 80 - B - 1030 Bruxelles - Tel ++32-2-7068230 - Fax ++32-2-7068253

Members:  
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**Key**

- |                             |   |
|-----------------------------|---|
| 1 riving knife              | 10 controls   |
| 2 saw blade(s) guard        | 11 saw blade guard support (may include pipe for chips and dust extraction) |
| 3 saw blade guard support   | 12 push stick   |
| 4 fixed guard beneath table | 13 sliding table  |
| 5 rip fence                 | 14 cross-cut fence mounted to the cross-cut sliding table                   |
| 6 clamping shoe             | 15 sliding table handle   |
| 7 table insert              | 16 moveable control panel   |
| 8 machine table             | 17 additional controls at the rear side of the sliding table                |
| 9 extension table           |   |

This definition will help to avoid confusion between “dimension saws” and cabinet saws in which the sliding table is “typically” not adjacent to the saw blade.

Our **second suggestion** is to not apply the “Proposed Rule” to “dimension saws”. This suggestion is supported by the following reasons:

- 1) “dimension saws” are not “consumer products”, but “professional machines”, typically operated by skilled workers specifically trained to use these machines. Such workers operate on “dimension saws” or on machines with similar risk level for a large part of their daily work. The processed materials are of high quality and skilled workmanship is required;

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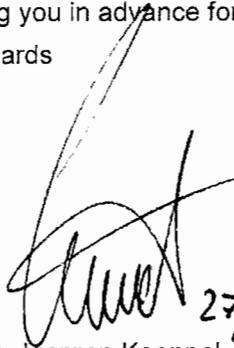
- 2) price of "dimension saws" ranges between 4,000 \$ to 60,000 \$ with a median price much more higher than 2,550 \$ estimated in Table 12 of CPSC-2011-0074 for cabinet saws that are the only type of table saws that could be "confused" with the "dimension saws";
- 3) the annually shipped "dimension saws" to the United States can be estimated at approx. 6,000 units. Taking into account that according Table 12 of CPSC-2011-0074 total annual shipments of table saws is 665,000 units where 33,000 units are cabinet saws (representing 5% of total table saws), it is possible to conclude that "dimension saws" annually sold represent 18% of cabinet saws and only 0,9 % of total number of table saws. Also assuming that cabinet saws represent 10% of the table saw population (see CPSC-2011-0074, XVIII Proposed Findings – B. number of consumer products Subject to the Proposed Rule - page 22241), "dimension saws" number will continue to be not significant in relation with total number of table saws.

From the technical point of view, EUMABOIS will be represented regarding this matter by Mr. Iuri Betti, from SCM GROUP spa. He is also the chairman ISO TC39/SC4 "Woodworking Machine" (<https://www.iso.org/committee/48390.html>) and expert in the related WGs. Since March 2014 ANSI is a P-member in ISO TC39/SC4 and in particular supported publication of ISO 19085-5 in 2017. Please do not hesitate to contact Mr. Betti for any technical matter or clarification ([iuri.betti@scmgroup.com](mailto:iuri.betti@scmgroup.com)).

We would appreciate to organize as soon as possible a WEB – conference between EUMABOIS and CSPC representatives eventually inviting also Mr. Bruce Rosenthal, chair of US ANSI TAG representing ANSI in ISO TC39/SC4 and member of ASC O1.

Thanking you in advance for your kind reply,

Best regards



27/04/18

Mr. Juergen Koeppel  
EUMABOIS President



Mr. Luigi De Vito  
EUMABOIS Vice-President

European Federation  
of Woodworking Machinery Manufacturers

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