



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
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March 11, 2016

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

Dear Mr. Stimitz:

On February 19, 2016, UL created a work area for *UL 62841-3-1 Ed. 1 - Proposal Review - Opened 2016-02-19* to review a proposal on UL 62841-3-1 Ed. 1.<sup>1</sup> The comment period and voting are open until April 4, 2016. The proposal includes the following:

- 1) Adoption of the First Edition of IEC 62841-3-1, Standard for Electric Motor-Operated Hand-Held Tools, Transportable Tools and Lawn and Garden Machinery - Safety - Part 3-1: Particular Requirements for Transportable Table Saws, as the First Edition of UL 62841-3-1.
- 2) Adoption of Active Injury Mitigation System (AIMS) requirements for table saws.

The proposed AIMS requirements mitigate injury from a rotating table saw blade by limiting the depth of cut to a test probe to 4 mm when the probe makes contact with the saw blade. The proposal also allows for a phased-in approach to implementing AIMS requirements for different category table saws (cabinet saws, contractor saws, and portable bench top saws).

Since the publication of an ANPR for table saws in 2011, CPSC staff has stated the need for safety requirements beyond a blade guard system to reduce the risk of blade contact injuries on table saws. Staff has provided UL with incident data that highlight the limitations of relying on blade guard technology to address the estimated 33,200 average annual emergency room-treated injuries associated with table saws.<sup>2</sup> Staff is very pleased to see UL taking significant steps to improve table saw safety with the addition of AIMS requirements. CPSC staff supports the proposed changes to the voluntary standard and believes the inclusion of AIMS technology in the

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<sup>1</sup> 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.

<sup>2</sup> Estimated average annual injuries are based on data from the CPSC's NEISS in the years 2009 through 2013 for table saws (product code 0841). This does not incorporate adjustment factors based on special study results.

voluntary standard will reduce the risk of injuries associated with operator blade contact. We urge the STP and UL to accept the proposal to incorporate these requirements into the standard. We also recognize that manufacturers of bench saws may need additional time to implement an AIMS that can meet the proposed performance requirements. For this reason, staff believes the proposed phase-in period is reasonable.

Thank you for this opportunity to comment. If you have any questions or comments, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Patricia Edwards", written in a cursive style.

cc: Patricia Edwards, CPSC Voluntary Standards Coordinator