



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

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October 22, 2007

Mr. Joe Musso
STP Chair – UL Subject 987
Underwriters Laboratories Inc.
333 Pfingsten Road
Northbrook, IL 60062

Re: UL 987, *Standard for Stationary and Fixed Electric Tools*

Dear Mr. Musso:

The U.S. Consumer Product Safety Commission (CPSC) staff^{*} appreciates this opportunity to comment on the September 7, 2007, ballot for UL 987 *Standard for Stationary and Fixed Electric Tools*. CPSC staff would like to comment on requirements 40A.10.2 and 40A.10.2.1.

Requirement 40A.10.2 states that a table saw blade guard shall minimize the hazard of jamming or wedging of the workpiece if a non-through cut is attempted. Requirement 40A.10.2.1 states that compliance with 40A.10.2 is met if the guard prevents a non-through cut from being started for material 0.25 inches above the blade for a cut at a 45° bevel setting and 0.40 inches above the blade at the 90° bevel setting. CPSC staff interprets this requirement to mean that blade guards must be removed to perform a non-through cut for materials thicker than the specified height above the blade thicknesses.

It is staff's understanding that current blade guard designs have to be removed for non-through cuts. CPSC data shows that consumers often remove blade guards and do not put them back in place. CPSC staff is concerned that requirement 40A.10.2.1 may preclude safer guard designs that do not require removal of the blade guard for non-through cuts. CPSC staff therefore recommends that requirement 40A.10.2.1 be provided as an option and not as a mandatory requirement.

^{*} This letter was prepared by the CPSC staff; it has not been reviewed or approved by and may not necessarily reflect the views of the Commission.

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These comments will also be transmitted to Underwriters Laboratories using the Collaborative Standards Development System (CSDS). If you have any questions or need additional information, please feel free to contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Caroleene Paul', with a stylized, flowing script.

Caroleene Paul

cc: Colin Church, CPSC Voluntary Standards Coordinator