



November 24, 2010

Inez Tenenbaum  
Chairman  
Consumer Product Safety Commission  
4330 East West Highway  
Bethesda, MD 20814

Dear Chairman Tenenbaum:

The National Consumers League urges the CPSC's speedy action in supporting rulemaking for the safety of table saws. The CPSC has jurisdiction to do so under 5 U.S.C. section 553 (e) and 15 U.S.C. section 2058 (i). The facts cry out for CPSC attention.

It has been seven years since the 2003 SawStop petition was filed asking that the Commission take action toward a safety standard on table saws. See the petition at the link below.

**Petition CP 03-2, Requesting Performance Standards for Table Saws - Part 1 (0841)**

<http://www.cpsc.gov/library/foia/foia03/petition/Bladesawpt1.pdf>

The technology exists – and indeed is being used today by one manufacturer – to prevent the needless and brutal accidents associated with the hazards of using table saws. These involve amputations of fingers, including potentially those of teenage students working with table saws in woodworking classes.

While this petition languishes before the Commission, with no action taken by previous CPSC officials, every day ten new amputations associated with the use of table saws occur. According to CPSC's own data, a table saw injury occurs once every nine minutes. The average per-accident business cost is estimated to be \$67,000. 30,000 people suffer injuries from table saws each year, and over 3,000 suffer amputations. Table saws sold in the U.S. are currently required to meet UL Standard 987 for Stationary and Fixed Electric Tools but this standard does little to prevent the amputations and injuries described above.

The hazards posed by table saws are unacceptable, especially when we have the means to prevent these accidents.

Once again, one company has developed and patented this safety technology. This is ample evidence that safer table saws can – and must – be adopted across the industry.

The safety technology involves a detection system such that when the table saw blade senses an electrical signal given off by human tissue – like a finger – the safety system is activated and the blade stops. Clearly the technology is effective, as demonstrated by hundreds of testimonials from shop teachers, hobbyists, students and others who operate table saws.

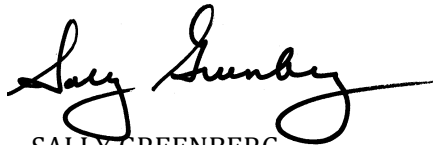
In this regard, NCL strongly urges the Commission to take action toward a performance standard

for table saw safety. We would urge you to give the industry a specific time period in which to adopt current technology or develop new technology to prevent grave injuries and amputations from table saws. The benefits of a performance standard include allowing for innovation and creativity in the design of a table saw with these safety components built in.

Table saw safety – and the ability of CPSC to take action to protect users of table saws– seems to us to be a classic example of how the Commission’s role was envisioned by Congress when the CPSC was established in 1972. While table saws do have certain inherent hazards, that is not an excuse for failing to enact safety regulations for these products. There are many products, such as lawnmowers and ATVs, which are inherently dangerous and yet are still regulated by the Commission. And because we now have the technology to prevent those hazards and the pain, suffering and cost that goes along with any pattern of human injury from a hazardous product, the Commission should take action. In closing, it is our view that the Commission should delay no further, and we urge decisive steps toward a rulemaking on table saw safety.

Thank you for your time and attention to our concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Sally Greenberg", with a long horizontal flourish extending to the right.

SALLY GREENBERG  
Executive Director  
National Consumers League

CC: Robert Adler  
Commissioner

Nancy Nord  
Commissioner

Anne Northup  
Commissioner

Thomas Hill Moore  
Commissioner