
Table Saw Blade Contact Injuries; Advance Notice of Proposed Rulemaking

Comment of Power Tool Institute, Inc.

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Power Tool Institute, Inc.

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EXECUTIVE SUMMARY

The Power Tool Institute, Inc. ("PTI") and its members have evaluated the Advance Notice of Proposed Rulemaking [Docket No. CPSC-2011-0074] (the “ANPR”), \(^1\) which resulted from Petition No. CP-03-2: Petition Requesting Performance Standards for a System to Reduce Injuries from Contact with the Blade of a Table Saw (the “Petition”). PTI contends that the U.S. Consumer Product Safety Commission (the “Commission”) should decline to adopt a mandatory standard for table saws and withdraw the ANPR. Rather, the Commission should rely upon the evolving voluntary standard UL 987, Standard for Stationary and Fixed Electric Tools.

The reasons for this include the following: (1) if the Commission were to adopt a mandatory standard of the type requested in the Petition, the Commission would be mandating a design requirement, which is not within the Commission’s statutory authority; (2) voluntary standard UL 987, Standard for Stationary and Fixed Electric Tools, 7\(^{th}\) Edition (published on November 5, 2007) and the 8\(^{th}\) Edition (published on October 19, 2011), are working to enhance table saw safety; and (3) the cost to consumers and manufacturers of a mandatory standard would far outweigh any benefits that may be realized.

Rather than imposing a mandatory standard, if the Commission determines that the evolving UL 987 voluntary standard does not adequately address an unreasonable risk of injury, the Commission instead should work with industry to suggest further refinements to the voluntary standard that might include a variety of alternative safety feature options depending on the category of table saw involved, since some safety options may not be appropriate or cost justified for the entire range of table saws.

The Petition Seeks A Design Requirement

Congress has empowered the Commission to evaluate and adopt safety standards for consumer products. Pursuant to Section 7 of the Consumer Product Safety Act, as amended, \(^2\) however, the Commission may only adopt performance standards.

As the Commission is aware, the company behind the Petition is SawStop, which is owned in part by patent attorney Stephen F. Gass. Mr. Gass, who holds an extensive network of approximately 90 U.S. patents (with at least 20 more patent applications filed and currently pending), has represented that SawStop’s patent web would be infringed by any alternative flesh detection technology, including the one developed by PTI and the one developed by Whirlwind Tool Company. If the patent web of SawStop cannot be avoided, the Commission would in effect be imposing a design standard, rather than a performance standard. The mandatory rule

\(^1\) 76 Fed. Reg. 62678 (October 11, 2011).
would create a monopolistic advantage in the marketplace, generating millions of dollars for SawStop and Mr. Gass, and raising costs for consumers. Whether or not the Commission promulgates a mandatory rule, there can be no assurance that Petitioners and SawStop would be willing to license their patent technology at any price, notwithstanding any of their assertions to the Commission to the contrary.

Promulgating a mandatory rule also would undermine and remove any incentive to the development of future new alternative table saw safety technology.

**Revisions to Voluntary Standard UL 987, Standard for Stationary and Fixed Electric Tools, Are Working To Improve Table Saw Safety**

The Consumer Product Safety Act, as amended, prohibits the Commission from promulgating a consumer product safety rule if compliance with an existing voluntary standard is likely to result in elimination or adequate reduction of the risk of injury in question.3

The ANPR listed four characteristics of traditional table saw guarding systems that Commission staff identified as motivating users to remove and not replace the guards: potential workpiece jamming, poor visibility, poor spreader alignment and mandatory removal of the blade guard for certain cuts. All four of these issues are addressed in the 7th Edition of the UL 987 standard. The open, modular design improves visibility. The adjustable extended riving knife reduces the potential for kickback during through cuts, in the extended position, as well as during non-through cuts, in the retracted position. This is an improvement over the three-in-one (spreader + guard + antikickback) assembly, which needed to be removed for non-through cuts and re-installed for through cuts. This, therefore, reduces the potential for kickback associated with misalignment of the spreaders by reducing the possibility of workplace jamming. Since the adjustable riving knife can be used for both through and the overwhelming majority of non-through cuts, transitioning to and from non-through cuts is simple. The latest revisions of the UL 987 standard requires, whether the riving knife is adjustable or interchangeable for multipurpose use, that all riving knife positions shall automatically align with the saw blade without any time consuming realignments by the operator being necessary.

Since the fourth calendar quarter of 2007, manufacturers have introduced over 900,000 saws with newly developed guard systems that meet the requirements of the updated UL 987, 7th Edition, safety standard. The results have been extremely positive. A recently completed survey and study by PTI members of accident reports involving the new modular guarding system proves that operator blade contact injuries are more than 4 times less likely compared to traditional spreader mounted guarding systems.4

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4 Based on comparison of accident reports involving bench top saws.
The injury data utilized by the Commission to justify moving forward with the ANPR included only data regarding saws with the traditional guarding system. Commission staff did not undertake any project to empirically measure the safety performance of the new UL 987 complying guards.

Even if the Commission determines that UL 987, 7th Edition, does not adequately address table saw injuries, the requirement of the new 8th Edition and the future revisions of the international IEC standards that are already circulated in Committee Draft form continue to improve table saw safety and highlight the industry’s commitment to table saw safety.

However, if the Commission disagrees with PTI and concludes that UL 987, 7th Edition, the requirements of the 8th Edition and the aforementioned revisions of the IEC standards that already have been circulated in Committee Draft form do not adequately address table saw injuries, then PTI would consider further development within the voluntary standards process that are based on the different table saw categories. Since each category of table saws has its own customer base with different user patterns and accident rates, it would be reasonable to tailor the safety systems that are specific to each category of table saws. For example, for the bench top table saws that, according to the Commission’s analysis, have the lowest accident rate and on which a requirement for flesh sensing technology would not be justified economically, PTI would suggest deferring to the latest revision of the UL 987 requirements (the 8th Edition with the latest current proposals). For the contractor and cabinet saw categories that the Commission has stated accounts for 89% of all operator blade contact injuries, PTI would consider new proposed voluntary standards that provide for either: (i) a permanent guard or indicator of guard status (guard detection) OR (ii) sensing technology.

The Cost To Consumers and Manufacturers of a Mandatory Standard Would Far Outweigh Any Benefits That May Be Realized

The Consumer Product Safety Act, as amended, prohibits the Commission from imposing a mandatory rule unless it finds the benefits expected from the rule bear a reasonable relationship to its costs, and that the rule imposes the least burdensome requirement which prevents or adequately reduces the risk of injury for which the rule is being promulgated.\(^5\)

In issuing the ANPR, the Commission has relied on the March 2011 Survey of Injuries Involving Stationary Saws, Table & Bench Saws 2007-2008 Report (“2007-2008 Injury Report”). As stated previously, the 2007-2008 Injury Report does not include any data with respect to table saws equipped with the modular blade guarding system meeting the requirements of UL 987, 7th Edition.

Although PTI acknowledges that there certainly are societal costs attributable to injuries on table saws, PTI submits that a meaningful analysis cannot be completed based upon the 2007-2008 Injury Report since it includes data only relating to old guard designs rather than the new modular blade guarding system. Additionally, PTI submits that the data being used by the Commission to estimate societal costs is based on extrapolations and predictions that are imprecise, resulting in societal cost calculations that are greatly overstated.

SawStop saws are available to any consumer who chooses to purchase them. SawStop technology is currently available on saws such as cabinet or contractor saws. These cabinet and contractor saws constitute 30.6% of saws on the market based on number of units in the marketplace. After years of promises SawStop is only now getting ready to release its version of a portable bench top saw with flesh sensing technology. However, based on pre-introduction publications in woodworking magazines, this table saw that will cost close to $1,000 is not the small, compact, lightweight and direct drive unit that the consumers are accustomed to purchasing today at prices ranging from $99 for consumer units to $600 for a professional premium model, and it will not meet the needs of the typical customer for these products. The belt drive configuration that is used by SawStop to implement the blade braking system and other aspects of its design make this table saw much larger, more cumbersome and heavy to handle. In essence, the yet to be introduced SawStop portable bench top table saw will be portable in name only.

In every table saw category, the SawStop technology adds a significant price premium to each table saw that uses it. Of course, each company that could secure a license from SawStop would independently establish its own pricing. However, it is clear that if SawStop technology were required, a current inexpensive bench top saw could increase in price from $100 to approximately $400 and the price of a current professional bench top saw could increase from $500 to approximately $800. This does not include the maintenance cost to consumers of purchasing replacement blades and firing cartridges and resulting downtime for the saw.

Simply put, PTI believes that the costs of the Commission adopting a mandatory rule exceed its benefits.

In any event and as discussed throughout these comments, the evolving voluntary standard UL 987 is working to prevent and adequately reduce table saw injuries and is considerably less costly and burdensome than the Commission imposing a mandatory rule.

PTI is not alone in its beliefs. PTI has collected and is submitting with these comments hundreds of comments that support PTI’s position from members of the public, and the vast majority of these commenters are users of table saws.
STATEMENT OF INTEREST

Organized in 1968, PTI is the leading trade organization in the United States that has members engaged in the manufacture or assembly of electric or battery operated professional or consumer portable and stationary power tools. The purpose of PTI is to promote the common business interests of the power tool industry, to represent the industry before government, to educate the public as to the usefulness and importance of power tools, to encourage high standards of safety and quality control in the manufacture of power tools, and to prepare and distribute information about safe use of power tools. PTI has nine members, six of the current PTI members manufacture table saws. These six companies are as follows: Stanley Black & Decker, Inc.; Delta Power Equipment Corp.; Hitachi Koki, U.S.A., Ltd.; Makita U.S.A., Inc.; Robert Bosch Tool Corp.; and Techtronic Industries, Co., Ltd., One World Technologies. These six companies collectively have over 200 years of experience in the table saw business and currently market a total of 24 different models of table saws. PTI members account for approximately 80% of the sales of all table saws sold in the United States.

Historically, PTI and its members have been successful in identifying potential hazards associated with power tools, including table saws, and continually improving the safety of their products. As part of this process, PTI and its members have always worked through the voluntary standards organizations such as Underwriters Laboratories and ANSI to develop standards that reduce and eliminate hazards associated with power tools. For example, PTI was instrumental in the introduction of the double insulation concept in the United States. With the introduction of double insulation, PTI sought to reduce the frequency of electric shock injuries and electrocutions associated with the use of improperly grounded tools and lawn and garden equipment on household circuits with defective or missing grounding or when the electrical plug or cord has been modified by the consumer. PTI introduced double insulation through the voluntary standards process, working with UL in creating the construction and acceptance requirements that were placed in the UL standards for electric tools, lawn and garden equipment, and eventually all products covered by UL standards. Likewise, PTI also was the driving force that changed the National Electric Code and OSHA requirements to allow the use of double insulation as an alternative to grounding. As another example, PTI worked with the Commission, UL, and various consumer groups to develop a voluntary standard for hedge trimmers – UL 1448 – in response to the Commission’s concerns relating to hedge trimmer accidents. Similarly, PTI and UL addressed the Commission’s concern for portable circular saw injuries by revising the voluntary standard for Portable Electric Tools – UL 45 – to improve guarding, warnings, acceptance testing and instructions. As a reaction to injuries obtained on miter saws, PTI also initiated a revision to the guarding requirements in the voluntary standard for Stationary and Fixed Electric Tools – UL 987. As one final example, upon learning that tool users were receiving electric shocks when drilling or cutting into walls that contain electric wiring, the power tool industry, primarily through PTI and UL, proposed and developed standard requirements for insulating gripping surfaces on tools that are now required on all tools that could expose users to this hazard.
These are just a few of the examples that demonstrate PTI’s commitment, through its members, to maintaining and improving the safety of all power tools. In the category of table saws, PTI also has demonstrated its leadership role in strengthening the safety requirements of the UL 987 standard through its participation in the following efforts:

- The revisions of the 6th Edition, which for the first time in the United States mandated the use of the riving knife.
- The revisions of the 7th Edition, which have introduced the use of the modular safety system of the riving knife, barrier guards and kickback pawls.
- The revisions of the 8th Edition, which are mandating strict performance requirements for the extended riving knife mounted guards not to interfere with the cutting process even under extreme bevel and compound cutting situations and to keep the extended riving knife in alignment with the blade.

PTI members also were instrumental in formulating additional requirements for table saws in the new harmonized IEC standard, which is currently being reviewed by national delegations as an IEC Committee Draft. The new additional proposals will require High-Low fence dimensions to accommodate cutting thin strips without interference with the guards; parallelism and load performance requirements for rip fences; saw blade alignment mechanism and flatness of the table tops with minimum required table top dimension to further reduce the possibility of kickback. It also will require a “zero voltage” sensor to prevent restarting of the motor following an interruption of the power supply to reduce accidental blade activation. Table saw safety is further enhanced by requirements for storage on the saw of removable devices (rip fence, miter gauge, barrier guards, kickback pawls) and the mandatory push stick, for the user’s convenience. PTI and its members always have been and remain dedicated to the continuous improvement and enhancement of consumer safety.

**COMMENT**

I. **Introduction**

On July 9, 2003 and September 5, 2003 the Commission published Notices in the Federal Register soliciting comments to the Petition. The Commission received 69 comments, including comments from PTI.

On July 11, 2006, the Commission voted to grant the Petition and directed Commission staff to draft an ANPR. On July 15, 2006, the Commission lost its quorum and was unable to move forward with publication of an ANPR at that time. Since then, the Petitioners, PTI

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representatives and others have held numerous meetings with the Commission regarding the Petition.

On October 5, 2011, the Commission voted to publish the ANPR, and the ANPR appeared in the Federal Register on October 11, 2011. The Commission subsequently extended the comment period on the ANPR, first to February 10, 2012 and then to March 16, 2012.

The primary Petitioners are Mr. Gass, David A. Fanning and James David Fulmer. According to the Petition, those Petitioners are members of SD3, LLC, a limited liability company holding patent rights to SawStop technology, which the Petition seeks to impose on all table saws through a mandatory standard.

PTI is the leading trade organization in the United States for members engaged in the manufacture or assembly of electric or battery operated professional or consumer portable and stationary power tools. PTI and its members, for the reasons discussed herein, respectfully request that the Commission withdraw the ANPR and defer to the evolving voluntary standard UL 987, Standard for Stationary and Fixed Electric Tools.

Section 7(a) of the Consumer Product Safety Act, as amended, limits the Commission to adopting performance (rather than design) standards, that are reasonably necessary to prevent or reduce an unreasonable risk of injury associated with a consumer product. Section 7(b) requires the Commission to rely upon voluntary consumer product standards, rather than adopt a mandatory standard, whenever compliance with such voluntary standards would eliminate or adequately reduce the risk of injury addressed and it is likely that there will be substantial compliance with such voluntary standards.

Prior to mandating a consumer product safety rule, the Consumer Product Safety Act, as amended, requires the Commission to consider:

- the degree and nature of the risk of injury the rule is designed to eliminate or reduce;
- the approximate number of consumer products, or types or classes thereof, subject to such rule;

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• the need of the public for the consumer products subject to such rule, and the probable effect of such rule upon the utility, cost, or availability of such products to meet such need; and

• any means of achieving the objective of the order while minimizing adverse effects on competition or disruption or dislocation of manufacturing and other commercial practices consistent with the public health and safety.12

The Commission also is required to prepare a final regulatory analysis of the rule containing, among other things, a description of the potential benefits and potential costs of the rule and of any alternatives to the final rule which were considered by the Commission.13 Finally, the Commission is proscribed from adopting a consumer product safety rule unless it finds, among other things, that the rule imposes the least burdensome requirement which prevents or adequately reduces the risk of injury for which the rule is being promulgated.14

II. The Petition is a Request for a Design Standard

Statutory Limitations

As the Commission well knows, Section 7 of the Consumer Product Safety Act, as amended, authorizes the Commission to promulgate consumer product safety standards that include requirements expressed in terms of performance, thereby prohibiting the Commission from promulgating standards based on design. The purpose of this provision, among other things, is to assure that government action does not stifle product innovation.15 Although the Petition purportedly describes a performance standard, there can be little question that the Petitioners seek to mandate the use of the SawStop technology on all saws.16

The Petition requests the Commission to adopt, in effect, a design standard cloaked in superficial language calling it a performance standard. Mr. Gass, a patent attorney, has filed more than 130 U.S. patent applications, and approximately 90 of those applications have issued

15 The Commission at one time possessed the power to promulgate mandatory consumer product safety standards that could regulate a product’s performance, composition, contents, design, construction, finish, or packaging. The Consumer Product Safety Amendments of 1981, however, eliminated the Commission’s authority to promulgate standards containing design requirements and instead required the agency to express standards in terms of performance requirements.
16 The analysis presented in this section is not intended to constitute an opinion by PTI or its members on the validity or extent of any patents held by Petitioners or related to the SawStop technology.
as U.S. patents which pertain to the SawStop technology. He told the Commission at a Commission open meeting on March 1-2, 2011 that the Commission should assume that no manufacturer will be able to introduce injury mitigation technology that does not infringe on his web of patents. Mr. Gass and the other Petitioners have aggressively expanded their patent portfolio in an attempt to corner the market for detection and blade braking saw technology.

As the Commission is aware, a joint venture composed of certain PTI members has developed a flesh sensing technology that reacts faster, has a lower replacement cost of firing, has a lower false trigger rate, can better differentiate flesh from wet woods, and mitigates injury to a greater degree when compared to the SawStop technology. Since that development project was undertaken, a number of patents were issued to SawStop related to sensing technology, and SawStop has stated to the Commission that the PTI joint venture system likely will infringe its patents. In light of this situation, manufacturers have to take into consideration the prospect that introducing this technology will result in costly patent infringement litigation (estimated to cost at least 7-10 million dollars for each party) with uncertain outcomes.

After the PTI joint venture sensing technology became known, SawStop amended one of its then-pending patent applications to purportedly cover any table saw that, instead of application of a blade braking system, would retract the blade rapidly within 14 milliseconds – using any retraction technique after detecting contact. This patent application, which was subsequently allowed by the U.S. Patent Office as Patent No. 7,895,927. SD3, LLC, the patent holding company for SawStop, is the listed assignee of this patent. Furthermore, SawStop will likely assert that this patent is not limited to SawStop’s blade brake-retraction technology, but rather covers any blade retraction technique, thus attempting to block the advancement of PTI’s pyrotechnic propulsion blade retraction system and further hindering the development of alternative and potentially more effective blade retraction technologies and potentially blocking competing inventors from using their own inventions.

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17 SawStop presently has approximately twenty (20) pending U.S. patent applications and approximately twenty (20) of their applications have been abandoned.

18 See e.g., AIPLA Report of the Economic Survey 2011 (reporting a mean cost of approximately $6 million for taking a patent case through trial where there is $25 million or more at stake). A complicating factor with the SawStop patents that will likely make the litigation costs exceed the average litigation costs is SawStop’s extensive and complicated patent web.

19 For example, claim 1 of the U.S. Patent 7,895,927 states:

A method of operating a woodworking machine, where the woodworking machine has a work surface defining a cutting region and a cutting tool that extends at least partially into the cutting region, the method comprising:

moving the cutting tool;

detecting a dangerous condition between a person and the cutting tool; and

retracting the cutting tool below the work surface within approximately 14 milliseconds after the dangerous condition is detected by the detection system.
As another example, U.S. Patent 8,061,245 (also assigned to SD 3, LLC) includes one claim that covers a process as simple and broad as: (i) detecting accidental contact with the blade and (ii) retracting the blade when contact is detected, so long as “at least a portion of the angular momentum” of the blade is used to retract the blade.\(^{21}\)

As yet another example, U.S. Patent 8,051,759 (assigned to SD3, LLC) further broadens the scope of the original blade braking technology claim by possibly covering any table saw that takes a danger-mitigating action when both of the following conditions are detected: (i) spinning of the blade and (ii) contact (or even proximity) with the blade.\(^{22}\) Of course, the table saw reaction systems are useful only when the blade is spinning. SawStop has several other patents that similarly seek to encompass basic features of any table saws with flesh-sensing detection systems.

PTI and its members, of course, have nothing against patents. PTI does, however, challenge whether the Petitioners should be allowed to use the government to mandate the use of a technology that is so broadly covered with a web of patents and thereby force its competitors to incur exorbitant license fees and/or expensive patent litigation (which costs will be passed on to the consumers).

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\(^{21}\) Claim 1 of U.S. Patent 8,061,245 states:

A method for minimizing potential injuries from a woodworking machine having a movable cutting tool, the method comprising:

- detecting accidental contact between a person and the cutting tool; and
- retracting the cutting tool away from the person in the event accidental contact between the person and the cutting tool is detected; where the cutting tool rotates and has angular momentum, and
- where the step of retracting includes using at least a portion of the angular momentum of the cutting tool to retract the cutting tool away from the person.

\(^{22}\) Claim 1 of the U.S. Patent 8,051,759 states:

A method of controlling a woodworking machine having a movable cutting tool, the method comprising:

- imparting an electric signal to a predetermined portion of the machine;
- monitoring the electric signal for at least one change indicative of a dangerous condition between the cutting tool and a person;
- sensing movement of the cutting tool; and
- performing a predetermined action to mitigate the dangerous condition when the change in the electric signal and movement of the cutting tool are both detected.
PTI would have similar concerns if the voluntary standards process were to be used to require a particular technology. Applicable regulations require the Commission, when considering Commission involvement in voluntary standards activities, to evaluate issues regarding the possible anticompetitive effects of such voluntary standards and whether the standards are performance rather than design standards.23

Promulgating a mandatory rule that could be fulfilled only with a specific technology would undermine and remove any incentive to the development of future new alternative table saw safety technology. In addition to safety developments described in the evolving UL 987 voluntary standard and the PTI joint venture sensing technology, saw blade perimeter flesh contact sensing table saw safety technology has been developed by Whirlwind Tool Company24 and various safety devices are being developed and sold by Save’em System.25 Adoption of a mandatory rule of the type requested in the Petition would reduce any incentive to develop future safety technology such as the foregoing.

SawStop Conduct

At one time SawStop approached table saw manufacturers offering to license its patent portfolio technology, demanding an 8% royalty on the retail value of all table saws with the technology in addition to other terms that were onerous. Recently, in a letter to the Commission, Grizzly Industrial, Inc., a table saw manufacturer that is not a member of PTI, explained that it tried to license SawStop's patent portfolio technology but negotiations failed when Grizzly alleged that SawStop demanded unreasonable royalties in excess of what was originally being sought. Mr. Gass has indicated he is unlikely to reach agreement on licensing terms in the absence of Commission action since his business would be hurt unless royalties sufficiently offset his losses. Whether or not the Commission promulgates a mandatory rule, there can be no assurance that Petitioners and SawStop would be willing to license their patent technology at any price, notwithstanding any of their assertions to the Commission to the contrary.

There can be little question that Mr. Gass and the SawStop company primarily are motivated by their own monetary gain, rather than purely to improve public safety. This is why Mr. Gass and his company have filed broad and far reaching patent applications that exceed the

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23 16 C.F.R. 1031.5. “The Commission will consider the extent to which the following criteria are met in considering Commission involvement in the development of voluntary safety standards for consumer products: . . .

(c) Exclusion, to the maximum extent possible, from the voluntary standard being developed, of requirements which will create anticompetitive effects or promote restraint of trade.

(d) Provisions for periodic and timely review of the standard, including review for anticompetitive effects, and revision or amendment as the need arises.

(e) Performance-oriented and not design-restrictive requirements, to the maximum practical extent, in any standard developed . . .”

24 www.whirlwindtool.com
25 www.savemsystem.com
scope of the SawStop technology. In fact, Mr. Gass and SawStop have attempted to exactly patent the table saw requirements of their proposed rule. The petitioners’ proposed rule has four requirements:

- a detection system capable of detecting contact or dangerous proximity between a person and the saw blade when the saw blade is a) spinning prior to cutting, b) cutting natural wood with a moisture content of up to 50%, c) cutting glued wood with a moisture content of up to 30%, and d) spinning down after turning off the motor;

- a reaction system to perform some action upon detection of such contact or dangerous proximity, such as stopping or retracting the blade, so that a person will be cut no deeper than 1/8th of an inch when contacting or approaching the blade at any point above the table and from any direction at a rate of one foot per second;

- a self-diagnostic capability to verify functionality of key components of the detection and reaction systems; and

- an interlock system with the motor so that power cannot be applied to the motor if a fault interfering with the functionality of a key component in the detection or reaction system is detected.\(^{26}\)

SawStop has attempted to make an infringer of any non-licensed table saw manufacturer whose table saws include these features. SawStop’s Patent 7,895,927 and Patent 8,051,759 (see notes 20 and 22 above) attempt to cover any table saw that has the first two requirements. The ‘927 patent requires only (in addition to moving the blade) (i) “detecting a dangerous condition between a person and the cutting tool;” and (ii) “retracting the cutting tool below the work surface within approximately 14 milliseconds after the dangerous condition is detected by the detection system.”

The ‘759 patent requires (i) imparting an electrical signal on the blade; (ii) monitoring the electrical signal to detect “a dangerous condition between the [blade] and a person;” (iii) sensing movement of the blade; and (iv) “performing a predetermined action to mitigate the dangerous condition when the change in the electrical signal and movement of the blade are both detected.” Incidentally, SawStop filed the applications for its ‘927 and ‘759 patents in 2010, approximately seven years after it filed its Petition.

In addition to the first two requirements, SawStop has attempted to patent table saws that include the last two requirements as well. For example, U.S. Patent 7,600,455 has a claim (claim 14) that recites:

\(^{26}\) See Petition CP-03-2.
A woodworking machine comprising:

a cutting tool for cutting workpieces;

a detection system adapted to detect a dangerous condition between a user and the cutting tool; a reaction system adapted to disable the cutting tool when the detection system detects the dangerous condition; and

a control system adapted to monitor the detection system and control actuation of the reaction system;

where the control system is adapted to test at least a portion of the reaction system to verify that the portion of the reaction system is operational without having to operate the reaction system.

These patents show that SawStop is attempting to patent the very requirements that it seeks the Commission to mandate.

In addition to its patent activity, Mr. Gass has volunteered on behalf of litigants to apply product liability pressure onto table saw manufacturers to adopt the SawStop technology. Despite Mr. Gass's representations to the Commission at the May 30, 2006 meeting that his technology is only one way to meet his proposed standard, Mr. Gass has been quoted as stating, "[w]e believe that it will be difficult to come up with anything that was outside the scope of our patents." (The Oregonian, December 23, 2004). Mr. Gass's announcement to the Commission that he is primarily motivated by ethical and societal concerns is not only belied by his statements and unreasonable contractual demands, but also by his actions in constructing a broad and intricate patent web to preclude anyone from complying with the proposed standard without agreeing to his demands.

If the Commission were to require SawStop technology on table saws, there can be no assurance that SawStop and Petitioners would willingly license technology on reasonable terms. In fact, if the government effectively requires use of the SawStop technology, SawStop could demand any license terms it wants or not grant any license at all.

III. Revisions to Voluntary Standard UL 987, Standard for Stationary and Fixed Electric Tools, Are Working To Improve Table Saw Safety

The Consumer Product Safety Act, as amended, prohibits the Commission from promulgating a consumer product safety rule if compliance with an existing voluntary standard is likely to result in elimination or adequate reduction of the risk of injury in question.27}

27 U.S.C. 2056(b).
believes that the existing voluntary safety standard for table saws (UL 987 7th and 8th Editions) and the new proposals to the voluntary safety standard for table saws that are currently in the approval stages at the international level are expected to result in further reduction of the table saw injury rate.

As the Commission is aware, the applicable voluntary consensus standard for table saws is UL 987, Standard for Stationary and Fixed Electric Tools. First published by Underwriters Laboratories, Inc. (UL) in 1971, the standard has undergone multiple revisions.


The new “modular” system consists of an adjustable riving knife, a removable blade guard assembly, and removable anti-kickback pawls. The riving knife can be locked into high and middle positions. When locked into the high position, it serves as the attachment point for the blade guard assembly and anti-kickback pawls. In the middle position, it is used for non-through cutting, where the riving knife provides guarding and anti-kickback protection. All designs have provisions to store the riving knife on the saw. Some designs include a “stored” or lowest setting position that can be used with dado blades without a need for removing the riving knife. The guard assembly consists of a pair of independently hinged, side barriers that attach to an upper barrier guard. No tools are required to install or remove this new blade guard system.

The ANPR listed four characteristics of traditional table saw guarding systems that Commission staff identified as motivating users to remove and not replace the guards: potential workpiece jamming, poor visibility, poor spreader alignment and mandatory removal of the blade guard for non-through cuts. All four of these issues already are addressed in the 7th Edition of the UL 987 standard. The open, modular system improves visibility. The adjustable extended riving knife reduces the potential for kickback during through cuts, in the extended position, as well as during non-through cuts, in the retracted position. This is an improvement over the three-in-one (spreader + guard + antikickback) assembly, which needed to be removed for non-through cuts and re-installed for through cuts. This, therefore, reduces the potential for kickback associated with misalignment of the spreaders by reducing the possibility of workpiece jamming. Since the adjustable riving knife can be used for both through and the overwhelming majority of non-through cuts, transitioning to and from non-through cuts is simple. The latest revisions of the UL 987 standard requires, whether the riving knife is adjustable or interchangeable for multipurpose use, that all riving knife positions shall automatically align with the saw blade without any time consuming realignments by the operator being necessary. Commission staff has recognized significant improvements with the new guard.28

28 ANPR Briefing Package, Recommended Advance Notice of Proposed Rulemaking for Performance Requirements to Address Table Saw Blade Contact Injuries, September 14, 2011, pp. 15-16.
All of the injury data considered by the Commission to date pertains to injuries that have occurred on table saws where either a guard was not being used or where the predecessor model guard was being used. Commission staff did not undertake any project to empirically measure the safety performance of the 7th Edition UL 987 complying guard systems.

Since the fourth calendar quarter of 2007, manufacturers have introduced over 900,000 saws with newly developed guard systems that meet the requirements of the updated UL 987, 7th Edition, safety standard. The results have been extremely positive. A recently completed survey and study by PTI members of accident reports involving the new modular guarding system proves that operator blade contact injuries are more than 4 times less likely compared to traditional spreader mounted guarding systems.29

PTI members Stanley Black & Decker, Inc.; Makita U.S.A., Inc.; Robert Bosch Tool Corp.; and Techtronic Industries have recently completed a survey of table saw accident reports and performed an analysis involving operator blade contact injury reports for the new modular guarding system in comparison to the reports for traditional guarding systems. Operator blade contact injuries are occurring 4.16 times less frequently with the new modular safety system compared to the injury rates with the traditional guarding systems.

The analysis compared the operator blade contact injury rates of bench top table saws with the new modular guarding systems to bench top table saws with a traditional spreader mounted guarding system.30 The injury rates were established based on calculating the number of “Table Saw Years” to produce one injury. PTI members that manufactured relevant saws submitted data for quarterly manufactured volumes for each guarding system design of table saws and a total number of operator blade contact injuries that were associated with the reported volume of table saws. Since various manufacturers started production of various models at different times, it was necessary to normalize the table saw volumes and duration of these saws on the market by establishing the number of “Saw Years” that accounted for the reported number of injuries. The total of all PTI reported “Table Saw Years” divided by the total number of reported operator blade contact injuries represents an injury rate for each guarding system design. By comparing these injury rates one can ascertain the safety performance of comparable designs. These results prove that operator blade contact injuries with the new modular safety system are occurring 4.16 times less frequently when compared to the injury rates with the traditional guarding systems.

29 Based on comparison of accident reports involving bench top saws.
30 PTI members did not manufacture contractor and cabinet style table saws for sufficient time periods and in sufficient numbers to reach statistically significant results for table saws in those categories with the new modular guarding system.
Of the estimated 66,900 emergency room-treated injuries involving table saw operator blade contact in 2007 and 2008, approximately 44,500 (66.5%) of the injuries occurred on table saws that did not have a blade guard attached. The most common reason for absence of the blade guard was removal by the consumer (75.0%). If users of saws equipped with the new guard find it necessary to remove the guard, it is easily replaced on the saw without tools. PTI believes this will result in increased guard usage and fewer injuries. Favorable public response to the new design suggests that this is the case. The new guard systems have been very well received by the user community. Table saw users are keeping the new guard on the saw more than its predecessor models and generally find that it is more user friendly.

An estimated 23,800 injuries (35.5%) for the 2007 and 2008 years occurred as a result of kickback of the material, including scenarios where kickback of the material caused the operator’s hand to be pulled into the blade, resulting in a laceration injury or amputation. Experience and testing proves that with the improved protection of the riving knife described in the updated edition of UL 987, the number of injuries resulting from kickback would be substantially reduced in the future.

Accordingly, PTI believes the data from the new guard system indicates that it is adequately addressing table saw injuries.

Even if the Commission determines that UL 987, 7th Edition, does not adequately address table saw injuries, the requirement of the new 8th Edition and the future revisions of the international IEC standards that are already circulated in Committee Draft form continue to improve table saw safety and highlight the industry’s commitment to table saw safety.

However, if the Commission disagrees with PTI and concludes that UL 987, 7th Edition, the requirements of the 8th Edition and the aforementioned revisions of the IEC standards that already have been circulated in Committee Draft form do not adequately address table saw injuries, then PTI would consider further development within the voluntary standards process that are based on the different table saw categories. Since each category of table saws has its own customer base with different user patterns and accident rates, it would be reasonable to tailor the safety systems that are specific to each category of table saws. For example, for the bench top table saws that, according to the Commission’s analysis, have the lowest accident rate and on which a requirement for flesh sensing technology would not be justified economically, PTI would suggest deferring to the latest revision of the UL 987 requirements (the 8th Edition with the latest current proposals). For the contractor and cabinet saw categories that the Commission has stated accounts for 89% of all operator blade contact injuries, PTI would consider new proposed voluntary standards that provide for either: (i) a permanent guard or indicator of guard status (guard detection) OR (ii) sensing technology.
IV. The Cost to Consumers and Manufacturers of a Mandatory Standard Would Far Outweigh Any Benefits That May Be Realized

A. Injury and Cost Estimates.

The Consumer Product Safety Act, as amended, prohibits the Commission from imposing a mandatory rule unless it finds the benefits expected from the rule bear a reasonable relationship to its costs, and that the rule imposes the least burdensome requirement which prevents or adequately reduces the risk of injury for which the rule is being promulgated.\textsuperscript{31} Simply put, PTI believes that the costs of the Commission adopting a mandatory rule exceed its benefits.\textsuperscript{32} In any event and as discussed throughout these comments, the evolving voluntary standard UL 987 is working to prevent and adequately reduce table saw injuries and is considerably less costly and burdensome than the Commission imposing a mandatory rule.

In issuing the ANPR, the Commission has relied on the 2007-2008 Injury Report. As stated previously, the 2007-2008 Injury Report does not include any data with respect to table saws equipped with the modular blade guarding system meeting the requirements of UL 987, 7th Edition.

PTI’s primary focus of its analysis of the 2007-2008 Injury Report is on blade contact injuries. The reason for this is that blade contact injuries are the only reported injuries addressable by flesh-sensing technology. PTI wishes to point out that a significant portion of table saw accidents are from objects thrown by the blade or caused by the workpiece propelled by a kickback. The flesh-sensing technology does not address in any way those injuries caused by thrown objects nor does it in any way prevent kickback.

Although PTI acknowledges that there certainly are societal costs attributable to injuries on table saws, PTI submits that a meaningful analysis cannot be completed based upon the 2007-2008 Injury Report since it includes data only relating to old guard designs rather than the new modular blade guarding system. Additionally, PTI submits that the data being used by the Commission to estimate societal costs is based on extrapolations and predictions that are imprecise, resulting in societal cost calculations that are greatly overstated. In the 2007–2008 Injury Report, Commission staff estimated that approximately 33,450 emergency department-treated blade contact injuries occurred annually over the 2-year period 2007–2008. From these estimated 33,450 annual injuries, the Commission Injury Cost Model (“ICM”) projected an

\textsuperscript{31} 15. U.S.C. 2058 (f).

\textsuperscript{32} It is PTI’s view that, in considering this proposed rule, the Commission should be mindful of President Obama’s directive in Executive Order 13579 issued on July 11, 2011, which states that independent agencies such as CPSC, to the extent permitted by law, should comply with Executive Order 13563, which requires that agencies should identify the “least burdensome tools for achieving regulatory ends” and that mandatory regulation should be issued “only upon a reasoned determination that its benefits justify its costs…taking into account, among other things, and to the extent practicable, the costs of cumulative regulations[.]”
annual total of 67,300 medically treated blade contact injuries with an associated injury cost of approximately $2.36 billion per year. However, there are numerous statements that table saw injury hospitalization rates are different from an average hospitalization rate involving all injuries. PTI questions on what basis (other than previous empirical experience not relating to table saws) the Commission staff can extrapolate from 862 injury reports to project 33,450 emergency room treated injuries and then more than double the emergency room-treated injury projections from the 2007-2008 Injury Report to project the medically treated injury number.

To illustrate the lack of reliability in the Commission projections as to the number of table saw injuries one only needs to compare the conclusions of the Commission’s own special follow-up studies to the 2001/2002 and 2007/2008 NEISS reports. In the language of Commission, “the results of the special study represent the most accurate estimates available” for table saw injuries. Despite this claim, the shortcomings of the projections are obvious in the following examples:

**A: Inconsistent Operator Blade Contact Injury Estimates**

The 2001/2002 NEISS projection for the annual average number of all table saw injuries is 38,490 and the number of annual operator blade contact injuries is 28,300. The 2007/2008 NEISS projection for the annual average number of all table saw injuries is 39,750 and the number of annual operator blade contact injuries is 33,450. Thus, according to NEISS projections, the number of all table saw injuries has increased by 3.3%, and the number of annual operator blade contact injuries has increased by 18.2%. This disparity calls the reliability of the estimates into question. The design of the guarding system is the same for both time periods and the material being cut and the construction technique have not changed. The training of the saw operator has not changed. Therefore, the sudden and more than fivefold disproportional increase in the percentage of operator blade contact injuries is inexplicable.

**B: Inconsistent Rates of Hospitalization**

The Commission follow-up study to the 2001/2002 NEISS projection has concluded that 11.0% of blade contact injuries required hospitalization. The Commission follow-up study to the 2007/2008 NEISS projection has concluded that 6.7% of blade contact injuries required hospitalization.

Since the mechanics leading to the injury (contact with a spinning saw blade) in both time periods is identical, a 67% difference in the rate of hospitalizations also cannot be explained and also calls into question the Commission estimates.
Questions like those illustrated by the above examples concerning the Commission estimates and PTI members’ own experience lead PTI to doubt the validity of the basic parameters that the Commission is using to calculate the societal cost of table saw injuries.

Economists engaged by PTI, Dr. Kip Viscusi, Ph.D., a Professor of Economics at Vanderbilt University, and Econometrica, Inc. have raised significant questions about the ANPR, including the injury numbers and cost data related to these injuries that has been utilized by the Commission. Their reports are attached hereto.33

The ICM developed by the Commission has components accounting for medical cost, work losses, insurance administration and liability cost that combined account for 20% of the average table saw injury cost, but 80% of the total ICM cost developed by the Commission is assigned to the pain and suffering cost component. PTI believes that especially the pain and suffering portion of the ICM is based on cost factors that are overstated, thereby overestimating the societal costs. In this regard, PTI is aware that plaintiffs’ counsel and defense counsel in table saw litigation have hired experts to assess the societal cost figure. Significantly, both sides are using the NEISS injury statistics of 28,300 reported blade contact injuries instead of the 55,300 predicted by the Commission ICM.34 Plaintiffs’ counsels have hired John D. Graham, Ph.D., the Dean of the School of Public and Environmental Affairs at Indiana University. For the year 2001, he estimates an average injury cost of $22,917 per table saw injury, which includes all of the Commission estimated medical costs and lost wages, but he has chosen to use only 50% of the Commission’s pain and suffering figure. Thus, Dr. Graham’s total societal costs for table saw injuries for the estimated 28,300 blade contact injuries in 2001 is $648.5 million – significantly less than the Commission’s estimate of $2.13 billion. The pain and suffering component of Dr. Graham’s analysis still constitutes by far the largest share of his estimated injury costs (in excess of $15,407 of the $22,917). Dr. Graham’s approach in valuing pain and suffering relies on the Commission’s review of data in Jury Verdicts Research. There are serious deficiencies in this approach. Dr. Graham attempts to apply results from the Jury Verdicts Research uniformly to all table saw injuries, but this approach is not supportable. The pain and suffering estimates in the Jury Verdicts Research are a convenience sample, not a random national sample and, as a result, will tend to be skewed to the larger stakes cases.

PTI also notes that, in the 2007-2008 Injury Report, only 6.6% of the cases (5,247 average per year) involved a victim that was either admitted to the hospital or transferred to another hospital for admission as compared to 11% hospitalization rate in the Commission’s 2001-2002 report. The remaining cases were treated and released from the hospital. This would

33 The report of Econometrica, which is attached hereto, concludes that the data used by the Commission significantly overstates both the annual total number of medically treated table saw blade contact injuries (Econometrica estimates 42,814 instead of 67,300) and the total societal cost of these injuries (Econometrica estimates $1.39 billion instead of $2.36 billion, leading to an estimated average cost of a table saw blade contact injury at $32,500). In reaching its conclusions, Econometrica assumed the accuracy of the NEISS-based Commission estimate of 33,450 annual emergency department treated table saw blade contact injuries; as stated elsewhere in these comments, PTI believes that estimate is overstated.

34 Based on Commission special study for 2001.
seem to be yet another factor suggesting that the $2.13 billion in societal costs referenced by the Commission is greatly exaggerated. Certainly, medical costs are a significant portion of societal costs attributable to table saw injuries. It cannot be disputed that the medical costs for an injury when an individual is treated and released from the hospital are going to be significantly less than when an individual is admitted to the hospital. Likewise, the number of injuries treated outside of the ER is not systematically accounted for, and there is no basis for doubling “the most accurate estimates available” by the Commission for reported blade contact table saw injuries. Also, it is unsupported that the average cost of these additional medically treated injuries outside of the ER is the same as the cost of ER treated injuries.

A final note on the Commission’s estimate on societal costs concerns the number of accidents predicted by the NEISS database. Obviously, this number is the basis to any prediction of societal costs related to those projected injuries. The NEISS based injury statistics are, at best, based on a large statistical extrapolation of relatively few actual injury reports with commensurate margins of error. In contrast to the statistics generated by this extrapolation, PTI members’ table saw injury experience is not remotely close to the Commission’s operator blade contact injury estimate of 28,300 for 2001 or 66,900 for the two year period of 2007 and 2008 as reflected in the 2007-2008 Injury Report. Actual reports of injuries to those table saw manufacturers that account for approximately 80% of all table saw sales during 2007/2008 years in the United States shows 335 injury reports received from January 1, 2006 to December 31, 2010. This is an average of only 67 per year and includes all table saw injuries, not only those limited to operator blade contact.

B. **Unintended Consequences**

Another factor that has not been fully appreciated in assessing societal costs is an evaluation of unintended negative consequences from adopting flesh-sensing technology: specifically, a decreased use of the blade guard. Although PTI does not contend that flesh-sensing technology has no merit, PTI submits that a decrease in guard usage as a consequence of mandating flesh-sensing technology on all table saws would result in additional non-blade contact injuries and injuries caused by workpiece propelled at high velocity from kickback. An increase in these injury scenarios would offset the potential societal cost benefits derived from using the SawStop technology.

PTI maintains that protection from contact with the blade remains the number one priority in table saw safety. SawStop technology requires contact with the blade and therefore only has the potential to mitigate injury in blade contact scenarios; it does not prevent blade contact injury nor does it in any way address non-blade contact injuries such as injuries caused by thrown objects. A decrease in the use of the blade guard means an increase in users operating the saw without the barrier to the blade and likely without the riving knife combination. This

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35 The Commission’s 2007-2008 Injury Report, and the Commission’s resulting estimates of 33,450 annual emergency department treated blade contact injuries and 67,300 annual medically treated blade contact injuries are based only on 862 actual injuries from this two year period.
greatly increases the number of potential blade contact and non-blade contact injuries. Providing a user-friendly guard, such as the new guarding system described in UL 987, 7th Edition, remains the best means by which to protect the table saw operator both from blade contact and non-blade contact injuries.

As for non-blade contact injuries, the Commission’s May 2003 Injuries Associated with Stationary Power Saws Report, states that approximately 5000 injuries (13%) of the estimated 38,000 injuries involving table saws occurred as a result of an individual being hit by stock/cutting materials or other flying debris. Assuming that the adoption of flesh-sensing technology on table saws results in a reduced frequency of guard use, it is a virtual certainty that injuries associated with operators being struck by flying objects will increase.

A decreased use of the blade guard also will result in an increased number of blade contact injuries, some of which will be severe injuries that result from high velocity contacts with the saw blade. Current flesh-sensing technology does not in any way prevent kickback from occurring on table saws. In addition to causing objects to be thrown by the blade, kickback can result in blade contact injuries when the operator’s hand is propelled into the blade when the kickback occurs. According to the 2007-2008 Injury Report, stock was kicked back or jumped in 40.5% of the injuries. It is undisputed that, in certain injury scenarios involving kickback, the operator’s hand is holding the work piece near the back of the blade and, when the kickback event occurs, the user’s hand is pulled into the blade. According to the 2007-2008 Injury Report, of the 22,400 estimated blade-contact injuries where kickback occurred, 14,600 (65.2%) occurred when the operator’s hand was pulled into the blade from behind the blade. PTI members have done kickback testing and have confirmed that wood can be propelled by the blade at speeds that exceed 200 inches per second. In literature that accompanies the sale of the SawStop saws, SawStop states that, assuming a 5 millisecond stop time, an operator can expect a 1/16th of an inch cut for every 12 inches per second of approach speed. Thus, at 120 inches per second, the user would sustain a 5/8 inch depth of cut, certainly enough to amputate multiple fingers if these fingers are contacting the saw blade at the same time, for example when an open hand or fingers would hit the back of the saw blade. Injuries where the hand is pulled into the blade from behind as a result of kickback cannot occur if the blade guard is in place. First, the riving knife/spreader combination greatly reduces the likelihood of a kickback occurring and, second, the riving knife/spreader combination, together with the guard, provide a barrier to the hand contacting the blade. If flesh-sensing technology is mandated on all saws and the frequency of use of blade guards decreases, injuries where a user’s hand is pulled into the blade as a result of kickback will increase as will the societal costs relating to those injuries.

PTI’s point in raising these issues is not to suggest that flesh-sensing technology does not have merit and cannot, in certain injury scenarios, mitigate an injury. PTI’s point is that flesh-sensing technology does not come close to addressing all injury scenarios and, moreover, the adoption of flesh-sensing technology likely will result in an increase in certain non-blade and blade contact injuries. Thus the estimation of societal benefits of incorporating a SawStop technology is incomplete and misleading if there is no consideration of increased cost to society.
due to unintended consequences. The modular guard that meets the current ANSI/UL 987 Standard is designed to reduce the likelihood of all injury scenarios, including blade contact, kickback, and flying objects.

C. Injuries Are Not Occurring on Consumer Oriented Saws

The data in the 2007-2008 Injury Report suggest that a large majority of the table saw injuries involved a professional grade table saw. With respect to the 66,900 operator sustained blade contact injuries that occurred over the two-year period from 2007 to 2008, 68.0% occurred on fixed cabinet saws and another 18.8% occurred while operating a contractor saw. Based on PTI’s experience, fixed cabinet saws and contractor saws are primarily used by professional woodworkers. Although there are do-it-yourself consumers that use fixed cabinet saws and contractor saws, it is logical to assume that the large majority of fixed cabinet saw and contractor saw users are professional woodworkers. In contrast, the data from the 2007-2008 Injury Report reflects that only 11.2% of the studied injuries occurred on bench top saws, despite the fact that the population of this category of table saws is more than twice as large as the population of contractor and cabinet saws combined. In this regard, it is important to recognize that, although the bench top category is more consumer oriented than the cabinet and contractor saw segment, the higher-end bench top saws are also used regularly by professional users.

While the Commission claims that less than 2% of the estimated table saw injuries are work related, PTI’s experience is vastly different. In the opinion of PTI, neither the NEISS data nor the 2007-2008 Injury Report can be accepted. As demonstrated by the 2007-2008 Injury Report, the NEISS reports have failed to filter out work related accidents in 16 out of the 862 cases. The 2007-2008 Injury Report was trying to ascertain if the accident is work related based on narrative description of the accident. In the narrative description the victim is focusing on describing the events leading to the accident and the fact whether the accident happened in the context of performing a work related activity is purely incidental. This suggests that a significant portion of the Commission estimated injuries are not occurring to those individuals the Commission is primarily mandated to protect.

PTI for some time has believed that accident rates with table saws are not uniform for all table saw categories. Significant variations exist in the way that saws are used including the frequency of use and the number of years the saw remains in service. An average cabinet style table saw may be used for hours, almost on a daily basis for many years, compared to an average bench top table saw that may be used only occasionally during the year for fewer years before being discarded. This disparity in usage needs to be considered in evaluating the odds of users

36 In Tab C to the 2011 Briefing Package, Memorandum from William Zamula, EC, to Caroleene Paul, Project Manager, “Performance Standards for a System to Reduce or Prevent Injuries from Contact With the Blade of a Table Saw: Economic Issues,” September 9, 2011, the Commission staff notes inconsistencies of survey respondent responses to questions regarding type of saw used and type of drive system in the saw. PTI questions whether these inconsistencies call into question other conclusions based on survey responses included in the 2007-2008 Injury Report.
sustaining a blade contact injury. For this reason, PTI compiled data on the estimated number of cuts performed by an average table saw of each table saw category. Using the estimated average frequency of cuts, and the estimated saw population, the 2007-2008 Injury Report percentages reported by the Commission, and the number of NEISS projected blade contact injuries for each table saw category reported by the Commission, PTI has calculated the number of cuts per injury and found them to be similar in each category; 1.4 million cuts for the bench top category table saws, 1.2 million cuts for contractor category table saws and 1.1 million cuts for cabinet style table saws. Thus the higher percentage of injuries reported by the Commission with respect to contractor and cabinet style saws is consistent with the idea that the risk of injury is greater when correlated to the number of cuts made. 37

It would seem that the Commission would be most concerned with injuries occurring to ordinary consumers on consumer oriented saws. Commission injury data, however, suggests that the ordinary consumer segment of users constitutes a much smaller portion of those individuals suffering injury.

PTI therefore questions whether the Commission has jurisdiction to adopt a mandatory rule based on these injuries. 38

D. Benefit-Cost Analysis for Bench Top Table Saws

Mandating SawStop technology for the bench top category of table saws is economically not justifiable. An economic analysis performed in an identical manner as utilized by the strongest proponents of SawStop technology supports this conclusion. As described below, estimated benefits of mandating SawStop technology of $91.35 and $142.00 are in each case less than half of the estimated cost of requiring this technology.

Dr. Graham has performed a Benefit-Cost Analysis (BCA) for an average table saw from a perspective of addressing the question of whether the costs of a SawStop type safety device are greater or less than the costs of injuries that are prevented by the device, during the lifetime of an average table saw. 39 In other words, at what point (switchpoint) would the cost benefit gained by a safety technology to reduce the cost of table saw injuries be offset by the added cost of such safety technology. The “switchpoint” cost refers to the maximum cost increase, in a typical table saw under consideration, that can be justified by a societal BCA of a safety system. If a safety system costs more than the switchpoint value, the safety system is too expensive. If the safety system costs less than the switchpoint value, the benefits of the system outweigh the costs.

37 These calculations are made, in part, based on the data available in the Commission’s own studies. In so doing, PTI does not concede the accuracy or relevance of the Commission studies.
38 15 U.S.C. 2052 (a)(5); 15 U.S.C. 2080(a) (“The Commission shall have no authority under this Act to regulate any risk of injury associated with a consumer product if such risk could be eliminated or reduced to a sufficient extent by actions taken under the Occupational Safety and Health Act of 1970…”).
39 Dr. Graham’s report is attached hereto.
While PTI acknowledges that the methodology of Dr. Graham to use BCA from a societal perspective gives certain insight to a regulating agency such as the Commission, we strongly disagree that it is proper to apply such an analysis to individual manufacturers. PTI also believes it is improper to perform such an analysis for an average table saw. Lumping all table saw categories into one basket, as done by Dr. Graham, is misleading. The industry, consumers, retailers and the Commission recognize distinct categories of cabinet, contractor and bench top table saws. Each category of these table saws has a distinct design characteristic; different life and durability expectations; a distinct customer base and, as indicated in the 2007-2008 Injury Report, substantially dissimilar injury rates per unit of table saws. In the paragraphs below, PTI will show the BCA for bench top category table saws using the exact same methodology that Dr. Graham has used, applying the same Injury Cost Model Dr. Graham used but adjusted for 2008 and the principle of utilization of only emergency room treated blade contact injury number estimates where this number is calculated from the 2007-2008 Injury Report based on the reported percentage of bench top table saw injuries. The population and life expectancy of bench top table saws are based on PTI statistics and market research.

The inputs for the BCA of the bench top category table saws are listed below:

<table>
<thead>
<tr>
<th>Input parameter</th>
<th>Description</th>
<th>Medium input values</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lifespan of the saw</td>
<td>The expected useful life of a bench top table saw</td>
<td>7.5 years</td>
</tr>
<tr>
<td>Injury incidence</td>
<td>An operator blade contact injury related to bench top table saw use of sufficient severity that the operator seeks medical attention.</td>
<td>33,450 x 11.2% = 3,746</td>
</tr>
<tr>
<td>Population</td>
<td>Number of bench top table saws in use</td>
<td>6,536,250</td>
</tr>
<tr>
<td>Injury rate</td>
<td>Average rate of bench top table saw injury = injury incidence / population</td>
<td>.000573</td>
</tr>
<tr>
<td>Average cost of injury (ICM)</td>
<td>Includes the following costs associated with table saw injuries: medical costs, lost wages, pain and suffering, and legal/liability fees.</td>
<td>$26,812.89^40</td>
</tr>
<tr>
<td>Discount rate</td>
<td>A rate used to compute the present value of injury costs that occur in future years.</td>
<td>3%</td>
</tr>
</tbody>
</table>

^40 ICM from 2001: Medical costs = $2,118

Lost wages = $5,392

Pain & suffering = $15,407 (here Dr. Graham has used ½ of CPSC $s)

Total = $22,917

2007CPI/2001CPI = $207.34/$177.10 = 1.17

Total ICM for end of 2007 = $22,917 x 1.17 = $26,812.89

($26,812.89 ICM is at the midpoint of the 2007/2008 Commission table saw injury statistics)
The annual cost of injuries per unit of a bench top table saw is a product of an average cost of a table saw injury, the injury rate for the bench top category of table saws and the effectiveness of the safety device. The total injury cost for each unit of the bench top table saws is the present value of the lifetime sum of annual injury costs.

<table>
<thead>
<tr>
<th>Year</th>
<th>Injury rate</th>
<th>ICM for 2007/2008</th>
<th>3% discount rate</th>
<th>SawStop effectiveness</th>
<th>Annual injury cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>0.000573</td>
<td>26,812.89</td>
<td>0.970874</td>
<td>0.9</td>
<td>13.42</td>
</tr>
<tr>
<td>2</td>
<td>0.000573</td>
<td>26,812.89</td>
<td>0.942596</td>
<td>0.9</td>
<td>13.03</td>
</tr>
<tr>
<td>3</td>
<td>0.000573</td>
<td>26,812.89</td>
<td>0.915142</td>
<td>0.9</td>
<td>12.65</td>
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<tr>
<td>4</td>
<td>0.000573</td>
<td>26,812.89</td>
<td>0.888487</td>
<td>0.9</td>
<td>12.29</td>
</tr>
<tr>
<td>5</td>
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<td>26,812.89</td>
<td>0.862609</td>
<td>0.9</td>
<td>11.93</td>
</tr>
<tr>
<td>6</td>
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<td>26,812.89</td>
<td>0.837484</td>
<td>0.9</td>
<td>11.58</td>
</tr>
<tr>
<td>7</td>
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<td>26,812.89</td>
<td>0.813092</td>
<td>0.9</td>
<td>11.24</td>
</tr>
<tr>
<td>7.5</td>
<td>0.000269</td>
<td>26,812.89</td>
<td>0.801075</td>
<td>0.9</td>
<td>5.21</td>
</tr>
</tbody>
</table>

Total injury cost per unit of a bench top table saw during its lifetime: $91.35

For the median value inputs, as listed above, and the switch point calculation methodology in accordance with that of Dr. Graham, if all bench top table saws as of the beginning of 2008 would use SawStop technology, the cost savings gained during the expected life of these saws, by mitigating the injuries through the use of this technology, would be $91.35.

As discussed in Section IV(a) above, PTI’s experience as to the number of table saw injuries and their associated cost is vastly different than the conclusions reached by the

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41 Dr. Graham has assumed the effectiveness of the SawStop safety system to be 80% to 100%, with respect to the cost of injuries. This assumption is based on expert testimony that the SawStop™ system will prevent injury in the vast majority of cases (Gass 2009). According to Dr. Graham, there will, however, be some cases in which stitches and other medical treatment are still required. There may also be cases of manufacturing defect or cases in which the operator’s hand moves into the blade at a velocity that is so rapid that the technology does not prevent serious injury.
Commission. For this reason, PTI has asked Econometrica to evaluate data from the 2007-2008 Injury Report, including to review credible available data to evaluate whether the ICM used by the Commission is appropriate for the table saw accidents. The report of Econometrica, which is attached hereto, concludes that the data used by the Commission significantly overstates both the annual total number of medically treated table saw blade contact injuries (Econometrica estimates 42,814 instead of 67,300) and the total societal cost of these injuries (Econometrica estimates $1.39 billion instead of $2.36 billion, and the estimated average cost of a table saw blade contact injury at $32,500).42

Using the ICM data points estimated by Econometrica, i.e the total number of medically treated injuries of 42,814 and the average cost of a blade contact injury of $32,500, but all other parameters and the methodology in accordance with that utilized by Dr. Graham, for the bench top table saw category the cost savings gained during the expected life of these saws by mitigating the injuries through the use of SawStop technology would be $142. Therefore, PTI concludes that for the bench top category of table saws, $142 is the highest possible economic savings gained from the use of the SawStop technology. However, the corresponding cost of requiring this technology is at least double this potential economic savings.

Making the SawStop technology mandatory for bench top table saws is not economically justifiable and it will economically damage consumers who need an inexpensive tool for occasional do-it-yourself (DIY) projects and small self employed contractors who may not be able to afford the likely $300+ price increase in the bench top category of table saws. In addition to this economic damage to consumers and self-employed contractors, at least some of these categories of table saw consumers will likely opt for less expensive non-table saw products (such as circular or band saws) to perform cutting operations for which a table saw performs more safely and efficiently.

E. Costs of a Mandatory Rule

SawStop saws are available to any consumer who chooses to purchase them. SawStop technology is currently available on saws such as cabinet or contractor saws. These cabinet and contractor saws constitute 30.6% of saws on the market based on number of units in the marketplace. After years of promises SawStop is only now getting ready to release its version of a portable bench top saw with flesh sensing technology. However, based on pre-introduction publications in woodworking magazines, this table saw that will cost close to $1,000 is not the small, compact, lightweight and direct drive unit that the consumers are accustomed to purchasing today at prices ranging from $99 for consumer units to $600 for a professional premium model, and it will not meet the needs of the typical customer for these products. The

42 In reaching its conclusions, Econometrica assumed the accuracy of the NEISS-based Commission estimate of 33,450 annual emergency department treated table saw blade contact injuries. As stated elsewhere in these comments, PTI believes that estimate is overstated.
belt drive configuration that is used by SawStop to implement the blade braking system and other aspects of its design make this table saw much larger, more cumbersome and heavy to handle. In essence, the yet to be introduced SawStop portable bench top table saw will be portable in name only. PTI questions whether there may be issues with durability and reliability of the SawStop technology on a saw of this type, which may be subjected to harsher and more varied working environments than other SawStop saws.

The SawStop technology adds a significant price premium to each table saw category that uses it. Of course, each company that could secure a license from SawStop would independently establish its own pricing. However, it is clear that if SawStop technology were required, a current inexpensive bench top saw could increase in price from $100 to approximately $400 and the price of a current professional bench top saw could increase from $500 to approximately $800. Dr. Gass has testified that the redesign, added components and royalty for flesh sensing and blade brake technology could add $100 to $150 to the wholesale cost of a bench top table saw and that a reasonable retail price of these devices is likely to be double of the wholesale cost price ($200 to $300). This does not include the maintenance cost to consumers of purchasing replacement blades and firing cartridges and resulting downtime for the saw.

Therefore, if the Commission were to adopt a mandatory rule, it could be tantamount to the elimination from the market of portable bench top saws as we know them today, due to the cost of compliance. The increased cost of even the least expensive table saws could result in power tool users resorting to unsafe methods to accomplish cuts normally performed on a table saw. For example, consumers could return to the practice of attempting to jury rig portable circular saws on various benches in an effort to perform ripping and cross cutting operations. Certainly, this could result in a significantly increased safety hazard.

An additional cost factor concerns the braking cartridge itself. Although a cartridge would be included with the initial purchase of the saw, a user would be required to purchase additional cartridges for occasional nuisance tripping at the cost of $69 and for the dado cutting at the cost of $89. Mr. Gass has indicated that users purchase an average of 3 cartridges with each SawStop saw. Commission staff has acknowledged that replacing such a cartridge is difficult.

A likely additional cost is replacement of the blade in the event of a brake cartridge trip – false trip or not. This could add a significant additional cost to the consumer. Blades can cost as much as $100.00.

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44 During the 1970’s and 1980’s, PTI members were made aware of many accidents involving portable circular saws attached to tables or plywood sheets. With the rising popularity of inexpensive consumer model table saws during the 1990’s, these types of accidents have almost entirely been eliminated.
Clearly, the added cost of the SawStop technology to the bench top table saws, approximately $300, combined with the cost of replacement parts and the cost of unintended consequence accidents is much greater than the potential benefit of $91 or $142 gained by mitigating the injuries. Furthermore the 2007-2008 Injury Report suggests that the bench top table saws account for over 2/3 of the existing table saw population but contribute only 11.2% to the volume of table saw operator blade contact accidents.

CONCLUSION

PTI and its members have concluded that the Commission should decline to adopt a mandatory standard for table saws and withdraw the ANPR. Rather, the Commission should rely upon the evolving voluntary standard UL 987, Standard for Stationary and Fixed Electric Tools.

The reasons for this include the following: (1) if the Commission were to adopt a mandatory standard of the type requested in the Petition, the Commission would be mandating a design requirement, which is not within the Commission’s statutory authority; (2) voluntary standard UL 987, Standard for Stationary and Fixed Electric Tools, 7th Edition (published on November 5, 2007) and the 8th Edition (published on October 19, 2011), are working to enhance table saw safety; and (3) the cost to consumers and manufacturers of a mandatory standard would far outweigh any benefits that may be realized.

Rather than imposing a mandatory standard, if the Commission determines that the evolving UL 987 Standard does not adequately address an unreasonable risk of injury, the Commission instead should work with industry to suggest further refinements to the voluntary standard that might include a variety of alternative safety feature options depending on the category of table saw involved, since some safety options may not be appropriate or cost justified for the entire range of table saws.
The following are consumers’ comments on the CPSC’s ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw" submitted via a portal created by the Power Tool Institute (www.powertoolinstitute.info).
Name: Peter Parker  
State: OH  
City: Vincent  
Address: 594 Lewis Pointe Dr  
Address 2:  
ZIP: 45784  
E-mail: peter_parker@woodcraft.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. There is already too much government regulation now that is not the American way, is unconstitutional, and is flat out wrong. Thank you for supporting freedom.

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I advocate the safety of table saw operators and the effort to make table saws more safe. It is obvious to this writer the primary reason for lobbying for a change in safety requirements if for monetary gain and not consumer safety. Mr. Gass has a conflict of interest and a selfish reason for promoting this legislation. Therefore, I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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In our shop we have 9 employees, we have 3 table saws & a band saw, we have not ever had an accident in (34 years) other than bruises from a kickback or two. We always use the guards and teach safety to any new employee using the equipment.

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Name: Bruce Ames  
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Address 2:  
ZIP: 66937  
E-mail: bames@awteq.com  

From my many years experience in the cabinet industry I believe a large portion of the table saw injuries are from lack of instruction or from carelessness. I have observed both.  

Dr. Gass, having covered his great invention with some 90 patents and applying for 20 more, has in all practicality eliminated competition for flesh detection. Giving him a market monopoly for this technology is not right. We all have the freedom to purchase the Saw Stop. It should not be mandated.  

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The new blade guard designs introduced in the last few years have brought the injury rate down to almost zero. It is not apparent that this new technology will reduce this injury rate any further, and in fact may increase it. The technology is available if buyers choose to purchase it on their saws. Let the market place determine the use of this technology, not government regulations that will create a potential monopoly and dramatically increase prices. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Rick Beckman  
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City: Holt  
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Address 2:  
ZIP: 48842  
E-mail: beckmania122@comcast.net

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the proposal to mandate ANPR as the only system to reduce or prevent injuries from contact with the blade of a table saw. The ANPR would mandate the use of a single technology, potentially creating a monopoly. This would fly right in the face of our free market economy and stifle any further development of new table saw safety equipment. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
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City: Foley
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E-mail: cewheeler@gulftel.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology.

Here is another case of the Government interfering in private business decisions. More regulations only sap the entrepreneurial spirit from our country. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Stephen Burke  
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I oppose the ANPR because I believe the development and adoption of safety technology should be done on a voluntary basis. Manufacturers and consumers should not be forced to accept one, and only one, technology. Furthermore, I believe that requiring this technology takes yet another step toward relieving the user/purchaser of any responsibility for injuries. Certain activities, i.e. using a lawnmower, riding a motorcycle, swinging a hammer, and, yes, operating a tablesaw carry with them inherent risks. It behooves the user to be aware of, and take steps to mitigate, said risks. Accidents happen, as they say, and, sometimes, we have ourselves to blame for them.  
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology.

This type of mandate will produce unintended consequences in the market place and therefore, the workplace. This rule which is contemplated as a measure to improve safety may in fact have a net negative impact. Unintended consequences are, by definition, those which occur due to forces and actions not discernible or measurable by the problem solvers/policy makers engaged in the process.

For this reason, I believe that instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process.

The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the mandated the use of a single technology and potentially creating a monopoly for this product. I am in favor though of all table saws having some effective flesh sensing device and believe the industry (other than Saw Stop) should be given 1-2 years to develop and implement equally effective systems. If the rest of the industry fails to comply within he time allotted, Saw Stop should then be allowed to proceed with producing the technology for others for a suitable period.

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It would be great if all America could afford to drive only the safest and best cars, it just does not work that way. We all have different needs and limited supply of funds to spend on every safety feature that pops up. The Saw Stop is a good saw with a great feature for safety. We called it the Hot Dog Saw, because that was all they would use to demostrate it at shows. I bought one for my fellows here at our shop. Not everyone to going to drop three grand plus to get an American Made Saw, Ha. That was what they clamed at first. It is made oversees! The average shop may or may not have the funds to spend for one, However; the home owners are going to have a hard at the price tag even if they make one for $1000.00. To past hard set rules for the public is hard but to mandate the use of only one style of saw is not the American way. This is a monopoly! There is laws against a monopoly of porducts. You might what to think about this move before passing it.

The court system with a sharp lawyer gave a person who did not nor could not read simple instructions of how to use a saw judgement. No one can understand how a jury could have awarded the case let alone the large sum of money for stupidity. As much as you probably would want to safe gaurd Americans, it does not always work. More labels, warning stickers they just add cost to buyer. You know the instructions usably are the thing consumers open when something fails to start.

I would say when all the fuss and dust settles; just use your common sense and good judgement for a decision. Personally, I would not be for a monopoly. I will be looking forward to your decision.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Ric Rodriquez
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
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Name: William Young  
State: PA  
City: Cressona  
Address: 87 schuylkill st  
Address 2:  
ZIP: 17929  
E-mail: Byoung@stmartincabinetry.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the proposed rule for a system to reduce or prevent injuries from contact with the blade of a table saw. It is not fair to mandate this rule on the public or manufacturers simply because some people don't know how to use table saws. This new rule appears to mandate the use of a single technology, which could create a monopoly, create conflicts of interest, and undermine the development of new table saw safety technology. Instead of imposing a law which mandates a single technology that may not be appropriate for all table saws, CPSC should stop trying to idiot-proof everything and instead work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process.
It would be impossible to apply the Saw Stop technology to small "bench top" tablesaws. The force created by the violent stop would rip the saw apart and cause even more injuries. It would eliminate these small saws from the market due to the cost involved with re-engineering the product to absorb the force. 10 times the number of injuries are caused by "kick back" then by amputation. The kick back injuries can be just as severe and deadly. For these reasons I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw."

The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I am dead set against the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. if we could buy this other places i would
I just read your article and you wrote "These new guarding systems are modular and offer excellent visibility and ease of removal and installation. In the four years since the introduction of the new guarding systems, there has been only one reported blade contact injury on a table saw with the new guard system". Based on this alone why is this even being discussed?

I have a solution, Mr. Glass is driving this issue so ask him to give up his patents so all the manufactures will be on a level playing field and see how quick this comes to a stop. (Ha, even without flesh detecting technology.)

I would like to say that before a cell phone retained all my phone numbers I used to HAVE TO THINK to remember my numbers. Now I do not - so I donâ€™t, saw stop will / is creating a false sense of safety.

Any machine is dangerous and if only one out of the group of products is set up this way, this in itself will be dangerous when operating other equipment. It removes the thought process of working / being safe. OUCH!

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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In addition to the comments above my personal thoughts are as follows: There are inherent risks with the use of any power tool be it a hand drill, a table saw or any other machine. Accidents will happen no matter how hard we try to regulate design. My thoughts are that if we want to put some time, effort and money into reducing the number of injuries do it with safety and operational training programs. We should let free enterprise be free and put the responsibility of safe operational practices on the operator where they should be.

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Name: Bill Patton
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City: Wichita
Address: 4826 Portwest
Address 2:
ZIP: 67204
E-mail: bpatton8640@gmail.com
I feel that the government should back down in their attempt to make all things perfectly safe for all users. While on the face, it seems noble, to make a tool safer through this rule change. At some point the user must be held accountable for their own actions. Instead new rules, new laws are enacted to "protect" them. Most of the times these new rules simply make additional revenue for attorneys. In my past experience, table saw accidents occur due to operator error and poor choice. So this proposed rule change would help that? I disagree. I believe also that the true cost of the change is not even been discussed yet. What is the cost if the saw stop technology is activated, even if by no contact by flesh, just a malfunction on some level? Cost in both replacement parts and down time? Never discussed. If owned by a monopoly, then I am certain that it will be much higher than anticipated. Continue to search out the best safety features, but know that on some level an individual must bear responsibility for their actions. So with that said continue with the following:

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
Name: Derek Schrock
State: KY
City: Bowling Green
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." As a consumer I feel that the purchaser of table saws should have the option of choosing what features they want to purchase and which are too expensive to be cost justified. I have been a woodworker for many years and have never had any safety issues with my table saw. I opposed being forced to buy a safety technology from a single company and would rather see the marketplace develop alternate methods of improving safety if needed.

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I am strongly against ANPR's efforts to force all producers of tablesaws to adopt a specific technology promoting safety. This technology exists as a choice today in a free and open market - consumers may choose to purchase technology if they desire to pay for the safety benefits of such a device. We don't need any more regulation or organizations making decisions for the American consumer.

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ZIP: 12430
E-mail: henry3256@earthlink.net

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a
table saw." The ANPR would mandate the use of a single technology, potentially creating a
monopoly and undermine the development of new table saw safety technology. Instead of
imposing a single technology that may not be appropriate for all table saws, CPSC should work
with the power tool industry and others in the table saw community to promote safety through
the voluntary standard process. The standard, ANSI/UL 987, already is working, has
demonstrated positive acceptance by table saw users, and is in the best interest of safety.
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Name: Don Yake
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Address 2: 
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I oppose the the use of single technology creating an monopoly. Other technology is available or being developed. The single technology is too expensive. Current standard does work and promote safety.

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Name: Blake Peterson  
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I OPPOSE the ANPR and their bid to monopolize the table saw / wood working industry. I have been taught to practice saw safety since I was a child and continue to do so today after 40 years of wood working and still have ALL of my fingers. I do not need someone telling me that I have to use their product. Every time one of these saws are "tripped" there is a cartridge that has to be replaced at a significant cost. Yes they may save fingers but they may also be tripped by a nail or even wet wood such as treated lumber. It could get awfully expensive using this saw and the only one benefitting from this is Saw Stop! Simple shop safety practices will accomplish the same goal. What is next, bandsaws, jointers, skill saws etc. It certainly won’t stop there. One thing this will accomplish is that it will drive up significantly the value of older saws.  

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This movement by the ANPR to mandate the automated stop system governing a table saw is overreaching and is too restrictive. I have seen the demonstration of the device and agree that it has great potential for specific applications, but with proper safety training and guarding, commercial users of table saws can function safe without the need of this additional equipment. This is an obvious attempt to push the sale of new technology. Let's make it available but not mandatory. In a world of new technologies, there are endless opportunities to mandate safety with the use of add on sensors and servo motors. We can keep simple equipment basic and allow people to think. There will always be risk that our brains need to consider.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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As a woodworker for 30 years and a guitarist for 45, I can appreciate the need to work safely. While accidents will occasionally be unavoidable, I also believe that safety begins with a mindset. I do appreciate the ingenuity which is applied toward product safety and it's potential for a reduction in accidents in a PRODUCTION environment. As a tool consumer, I typically consider ALL of the features the product has to offer - be they ergonomics, power and safety - and I adamantly believe that the choice should remain the consumer's. The owner of a large shop will likely choose a table saw with inherent safety systems thereby reducing insurance costs, while the owner of a single person shop may not feel it necessary and the additional cost will serve only as an unnecessary burden. Therefore, it is for that reason that I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Karl Anderson
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Joseph Scherer  
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As a manager of a wood job shop, I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." We teach our employees good table saw safety. It is our right to determine if we want the latest technologies in safety. Once again it becomes all about the money and one person's financial gains. Last time I checked I thought we were living in the free country of America. Get the government involved and we will need the lawyer to turn on the table saw. The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.  
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I am against the mandatory use of saw stop. I think it is wrong for one individual to do what he is doing only to monopolize the market. I am tired of lawyers twisting the system and using our government to overstep its boundaries. When does it stop?

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I strongly oppose making it mandatory to use Saw Stop. I work in a kitchen cabinet shop and years ago we did have a few accidents. But we came up with ways of safeguarding our saws without the Saw Stop system. We have not had an accident for many years (probably 20 plus years).

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And then they came for the table saw. The Consumer Product Safety Commission (CPSC) has decided table saws are too dangerous and want to make strict new rules for the way they’re designed. The commission is considering mandatory inclusion of an unprecedented safety standard flesh-sensing technology, which can stop the blade the instant it contacts skin. Great, right? With the new safety feature in place, we can all grab the spinning blade without fear. A cool party trick. All will be well.

I can appreciate safety features for table saws, but the simple fact is that most people, pros and CONS alike, treat the saw with respect and operate it safely. Yes, some people lose fingers, but it seems like simple math to me: Keep your fingers away from the blade and they stay on your body. And if you never contact the spinning blade with your flesh, then any flesh-sensing technology would be useless to your saw.

I don’t mean to be insensitive to victims of table saw accidents, and I can see the value of the technology, especially during training or when unsupervised kids start playing with their parent’s equipment. It’s a groundbreaking innovation and should definitely be an option on the market. But by and large, the vast majority of table saw accidents are the fault of the user, not the saw manufacturer. Instead of focusing on the small minority of accidents, maybe we should consider the plight of the countless other saw users, many of whom make theyâ€™re living with their power tools.

With the CPSC dead-set on the new regulation, the agency seems apathetic to its unintended consequences. According to the Power Tool Institute, Inc., if the regulation is made mandatory, a current inexpensive saw selling for $100 could increase to approximately $400, and a current professional benchtop saw selling for $500 could increase to approximately $800. It makes no sense to penalize the millions of responsible working-class Americans, who are careful to avoid injury, by forcing a new government mandate that would inevitably raise the price of their tools.

And where do the new rules stop? At what point does our personal responsibility begin and the government’s responsibility to coddle us come to an end? Should all knives be dull? Should all forks be sporks? When will we be forced to wear bike helmets all day because someone, somewhere, might fall down and break their crown?

I think the flesh-sensing saw technology is a clever invention, and it certainly has its place as a voluntary design optionâ€”just not as a mandatory regulation.

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"I oppose the mandatory rule for table saws. Those at SawStop seek to mandate the use of a single technology, potentially creating a monopoly and undermining the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users."

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Name: LARRY KOOP
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." I have one saw stop in my shop. The other two saws do not have one because it would be a detriment to our production and restrict the custom cutting procedures of our business. I have been cutting on table saws since 1970 and am in custom cabinetry. With the many demands put on the type of cabinetry I build the saw stop would eliminate 35% of the type of cutting I do and cost hundreds of hours in unnecessary set up time. With the hourly rate between 20 and 25 $/hour in my shop it is not a benefit at all.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: John Weber  
State: PA  
City: Bethel Park  
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ZIP: 15102  
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"I oppose the mandatory rule for table saws. Those at SawStop seek to mandate the use of a single technology, potentially creating a monopoly and undermining the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users."

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"Machines Do Not Compensate For Human Error"

The only safety device that will prevent injury and accidents on any machinery is the operator's awareness. Training, education, and awareness is vital in the use of any woodworking machinery but the Absolute Most Important fact is that the operator has to Pay Attention and Focus on what they are doing. All safety devices in place and working properly still all it takes is someone not paying attention to cause themselves serious injury. It's the human at the machine that causes the greatest danger to himself.

I have over 41 years experience with tablesaws and the 2 minor injuries I sustained were my error not the machine's. All of the few tablesaw injuries and near misses I've witnessed over the years have been operator caused.

What I believe it comes down to is if we are going to do something about the Safety Issue we need to come at the awareness/training and get more creative there rather than mandate something that will actually increase injuries by the unprepared user believing the Sawstop will save him. More Safety Guards are not the answer they can and do cause a false sense of security.

I include the following because it does speak to how I feel about this mandate issue. I disagree that the Machine is the problem when I know it is the person that chooses safety or carelessness. "I oppose the mandatory rule for table saws. Those at SawStop seek to mandate the use of a single technology, potentially creating a monopoly and undermining the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users."

No safety device is completely stupid-proof sorry but it's true.

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I. Notices and Communications
Notices and communications with respect to this filing may be addressed to the following:
Andrew Rodriquez

II. Introduction
As a hobbyist woodworker, I wish to express my concern regarding the possibility of the CPSC issuing any sort of rulemaking regarding an obligation to include flesh detection technology on table saws. While I understand the CPSC’s concern regarding table saw safety, there are a number of alternative approaches already in existence that make the need for such a rulemaking questionable. While recent legal actions (such as the Osario vs. One World Technology case) might seem to indicate a need for regulation, drawing such a conclusion from current evidence is flawed.

III. Alternative Safety Methods Exist
While it is easy to assume that flesh sensing technology is the answer, it is an excessive solution to a problem for which many other options exist. The most obvious option is for users to follow the instructions that come with the tool. Table saw manuals identify danger zones and specify any number of safe procedures to be used when operating the tool. The obligation to include such procedures and warnings is already within the jurisdiction and regulation of the CPSC.

Next, users can and should use simple tools like push sticks to keep their hands out of the danger zone. Push sticks are simple mechanisms, often made from scrap lumber, that are used to guide workspaces through a saw blade with minimal risk to the user. These sorts of tools take a minimum amount of skill to assemble, and in many cases can simply be a block of wood.

Third, there are any number of more advance work piece handling tools that can be used. Similar to push sticks, they are designed to keep user appendages outside the danger zone for the given tool. In addition to the simple safety provided by a push stick, these devices often include advanced ergonomic or utility benefits.
This is not to say that flesh-sensing technology does not have a place in society. Clearly, some people will choose to place a premium on safety and wish to have as many safeguards in place as possible. However, that should be the consumer’s choice, not a regulatory decision.

IV. CPSC Action in this Area is Preferential, Unjust, and Not in the Public Interest
At this point in time, there is only one commercial provider of flesh-sensing technology and that is the system developed by SawStop. While other technologies exist (such as the Whirlwind system currently being developed and tested), they are not true flesh-sensing technologies, as they are based on obstruction, rather than skin impedance or resistivity.

The SawStop technology is patented. While it can be licensed, there is only one provider of the technology. As such, until such time as that patent expires, any CPSC action to mandate flesh-sensing technology would essentially create a monopoly in violation of anti-trust laws.

Further, such a regulation would clearly raise the cost of a commonly used tool. Table saws are often one of the primary tools in a workshop, as it can perform so many basic functions straight cuts, miter cuts, rip cuts, dado cuts, cutting tenons, and more. Assuming the CPSC action being considered is only limited to table saws, it should be noted that the basic SawStop table saw is listed on the SawStop website as starting at $1599. Similarly configured saws without flesh-sensing technology current cost $600 or less, while extremely basic table saws can be purchased for less than $200. In other words, the marginal cost of this technology today is approximately $1000-$1400 per tool. Such an increase would effectively price out the average user. While it is possible the technology itself could come down in cost as volumes increase, it is unlikely that such reductions would be able to overcome such a significant hurdle.

Further, such action might have a more negative side effect that positive. Absent a table saw, workers may shift to less conventional approaches to perform tasks better suited to a table saw (e.g., circular saws, band saws, jig saws, radial arm saws, miter saws, etc.). Before taking any action, I would ask the CPSC to analyze the impact of transferring this work to this other equipment to determine whether the inevitable migration from table saws to alternatives would actually reduce risk, or increase it as workers begin having to use tools with which they are less familiar.

Finally, beyond the hobbyist, many small businesses use portable table saws. Raising the price of a table saw and increasing the burden on such small businesses is likely to have a negative effect on these businesses, demographically singling out the lower income workers that depend on such tools to perform the labor that is core to their businesses. While it would be incorrect to assert this as any sort of class-based discrimination, the fact of the matter is that lower-income groups will be disproportionately affected by the proposed rule compared to others.

V. Operational Safety is the Responsibility of the Operator, not the Manufacturer

With any operation involving machinery, there is an inherent risk that must be considered. Woodworkers are not obligated to buy table saws; they choose to do so to meet specific needs. There are a number of woodworkers that pride themselves using only hand tools to build, so alternatives to power tools clearly exist.

While people may injure themselves with table saws, it is because cutting wood (with a table saw, a circular saw, a hand saw, or any other instrument) contains by definition some risk. Anything that can cut wood will also cut flesh. However, there are a number of home appliances and tools with similar capabilities:
- Food processors
- Meat slices
- Chain saws
- Meat grinders
- Lawn mowers

The public has learned to treat these implements with respect, and recognize their inherent risk. While some of these tools have safety elements built into them (e.g., kill switches built into lawn mowers and chain saws), they nonetheless retain some element of danger (e.g., running over a foot with a lawn mower, or cutting into a leg with a chain saw). Regulation should be limited to protecting consumers from tools that are dangerous, but not activities that are dangerous. In this case, the activity by its very nature carries risk, whether being performed with a hand saw, a hammer, or any of a hundred other tools used in wood working. To call out the table saw is arbitrary at best, and at worst, seems to indicate a specific interest created through aggressive lobbying focuses more on creating demand for a new technology as opposed to actual produce safety.

VI. The Carlos Osario Case is the Exception
The recent Osario Case, in which a plaintiff successfully sued a tool manufacturer for the plaintiff’s improper use of the tool, is an example of a case where the legal system failed. In that case, a jury found in favor of a plaintiff who chose to violate a number of common sense safety practices, any one of which could have kept him from harm. In that case, Carlos Osario:
- Did not have experience using a table saw
- Operated the table saw with several safety features removed (the blade guard and the splitter)
- Attempted to perform a rip cut without properly setting up the table saw to perform cuts (not using a rip fence)
- Encountered trouble with binding during the cut, but attempted to force the cut, with that excessive use of force ultimately carrying his hand into the saw blade

As a woodworker, I believe it is reasonable to assume that anyone who took these actions was themselves negligent, and their negligence was the cause of their injury. While it is true that flesh-sensing technology would have reduced or eliminated Mr. Osario’s injuries, so would a minimum level of competency as can reasonably be expected from a professional performing this job. At a minimum, a professional would have used a rip fence, which would have reduced the possibility of the saw binding. Additionally, keeping the blade guard in place also likely would have mitigated the problem. The improper actions of an unskilled laborer using a tool for which they had not undertaken any minimal level of user education or training (such as reading the manual) is not a justification to impose such draconian regulation as is implied by the CPSC’s ANOPR.

VII. Conclusion
While I believe the CPSC is well intentioned, its ANOPR preludes to a regulatory direction that is inappropriate. The balance between public regulation and personal responsibility can at times be difficult to manage, but in this case, such an intrusive regulation goes far beyond what is just and reasonable. For these reasons, I ask that the CPSC reconsider their policy direction, and not
pursue a rulemaking that would impose a requirement for table saw manufacturers to include flesh-sensing technology on their tools.

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I oppose the ANPR for the SawStop. This is an example of too much government.

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Name: Gordon Brickey
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Address 2: 
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E-mail: glbrickman@gmail.com
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

Please redirect your efforts to safety education and labeling instead of pushing an expensive solution that I do not want and I believe will be detrimental to the trades and wood related hobbies. Help us promote safe and responsible tool use instead of promoting a solution that would require the use of a single technology in all cases.

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Although I agree with the reasons driving the CPSC's proposal for tablesaw safety, I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. We all need to work hard on protecting consumers and users of tablesaws, but the proposed rule change would not be a positive step in the industry.

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Name: Donald Tweed  
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

I am 80 years old, and for 60 years have operated many power tools, including various table-saws. I currently own a Rockwell Model 10 Contractor's Saw which must be over 25 years old by now. All of my fingers are intact because I pay attention. In my opinion, Osario (sp) was stupid, his supervisor was criminally negligent and those 12 jurists who came up with the incredibly moronic decision to penalize the saw maker should all be declared mentally incompetent.

The SawStop 'hotdog test' is unrealistic. In an accident you don't slowly inch your finger into a saw blade, you RAPIDLY jam your finger/hand/arm/ into the blade because you are pushing into the blade, or you have slipped and and are lurching into it. Wh haven't seen that test, have we?

So what's next from super-nanny; a mandate that all cars be capable of driving themselves? After all, the technology is (almost) available, so why not mandate it and protect all the incompetent drivers from themselves?

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. I have been a woodworker for 30 + years.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." I am aware of at least one failure of this technology and of the potential for serious increased risk in the very popular transportable tool size saws. Further, I've been told that no formal failure analysis of the system has ever been performed or documented by SawStop. I am very concerned that unintended risks of harm from unidentified failure modes will unreasonably endanger the 1000's of reasonably careful woodworkers who would otherwise have been reasonably safe without the device. Safe management of the tremendous amount of energy and related forces applied by actuation of the device has not been reasonably evaluated and addressed across the full line of table saw designs. The effectiveness and failure modes of the device with the various cutting accessories regularly used on table saws has not been evaluated or documented by SawStop. Instead of imposing a single technology that has not yet been proven appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

It is the user's responsibility to safely use a tool and the safety devices provided. Consumers already have to option to purchase tools with additional safety features should the wish to do so and to pay that cost accordingly.

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I oppose requiring all saw makers to use a single technology. With current safeguards and proper training, table saws can be operated safely. Improper use does not pollute the air or water making it a public health issue, rather it is a matter of personal safety. If someone wants the Saw Stop safety features, they can buy it. I chose not to buy it because I thought it was unnecessary for me. The choice is there if someone wants it. Don't force everyone into this mold.  
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I oppose a federally mandated use of "flesh detecting technology on table saws". As a citizen of the United States of America and a consumer, I believe that "flesh detecting technology" is not appropriate on all table saws and for every saw user. Thousands of users have not injured themselves in use of their table saws. Past accidents with table saws could have been avoided by not using one. It is a freedom that the consumer must choose. "Flesh detecting technology" is available to the consumer at this time on the Sawstop table saw. Again, I oppose any decision to federally mandate the use of "flesh detecting technology" on all table saws.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I am writing to you today in regards to the decision of sawstop style technology. I dont even know where to begin. Having used extensively both bolt to the floor quality cabinet style saws to cheap home depot throw away models. Having sawstop technology will not stop anything. Mr. Gass is just trying to shove his patent down our throats, and the vast majority of us do not want it. The fact of the matter is his technology does ZERO/ABSOLUTELY nothing to prevent kickback. Having been on the receiving end myself of such a kickback. I can personally say its a "less than desirable" event. Would sawstop of helped me then? Nope. In fact Mr. Gass must rely on industry standard guards to prevent such an incident. The fact of the matter is. no matter what you do to a saw to make it safer, its easily disabled. Mr. Gass himself states that the reason there are so many accidents is because people disable or remove the safety guards that come standard with a saw. What makes his system any different? Especially on a job site where people routinely cut through nails and screws and use green or wet lumber. No contractor is going to burn up 200 dollars a day and lost productivity because somebody cut through a nail in a board. Quality guarding, and a workable riving knife system is more realistic. If you must force manufactures to do anything. Make them invest in regional training sessions. The fact of the matter is a table saw is no more dangerous to a conscious well trained user than a common kitchen knife is. In Conclusion. Safety Is top pririty however sawstop technology is not the answer in this case. The answer is useable, quality guarding.
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

These words above, although for illustrative purposes, pretty much sum up how I feel towards the matter. The only thing that I want to add is I think that people should be held responsible for there actions or failure of actions. It should be common sense to read the owners manual and should the recommendations it gives. It also should be common sense not to put one's hand in a position to where it is close or could become close to a spinning blade that is designed to cut stuff.

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To begin, no one should have an issue with safety or even with requiring minimum standards to help insure a safe workplace and safe consumer goods.

There is, however, a distinct disconnect between regulating safety standards and responding to lobbying efforts by individuals or business concerns that stand to capitalize on the resulting regulations, especially when said businesses have secured patents covering claims that preclude the emergence of any alternative technology, thus insuring a monopoly.

In the matter of Dr. Gass and SawStop Inc., it becomes questionable as to whether the CPSC is potentially being used as the 'lever of last resort' to require an entire industry to adopt 'flesh sensing technology' after attempts by Mr. Gass to license his technology to the industry have met with resistance, partly due to licensing terms.

Material costs of adoption notwithstanding, granting such a regulation would allow Dr. Gass to set the terms of a license without requiring any negotiation between himself and the industry, he would have total monopolistic control over the cost to adopt.

Arguments as to whether the industry might adopt alternative means to accomplish the same ends are only viable if there are other patents currently in force from a competing technology, any future technology seeking patent protection for a similar purpose will be denied or it's claims reduced due to the extensive number and broad range of claims granted to Dr. Gass since 2001 in over seventy patents granted and several more pending for this particular technology.

In all, if the CPSC sees fit to require this technology of the industry, the industry will have no recourse but to license it from Dr. Gass. Any attempt to field a proprietary solution from the industry will be met with an infringement suit, which will prevail after a three or four year court battle.

The industry will suffer job losses since many consumers will no longer be able to afford the higher costs of tool aquisition, some companies will cease their U.S. operations and concentrate on non-U.S. markets, further depleting domestic jobs and this circumstance will continue for the life of the patents.

I wouldn't be surprised if a decision to adopt this regulation resulted in the general public's suspecting collusion, especially given the current state of public antipathy for government agencies in general.
If, in the interests of safety and the public good, Dr. Gass's patents were to be made public domain, set aside or alternative technology allowed to emerge without threat of legal action, then I would be in favor of the proposed regulation, however, that's not the case at the moment, leaving the CPSC a difficult decision to make, I hope the CPSC considers some of what I've pointed out in it's decision making process.

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Address: 8241 Deer Pond Ct.  
Address 2:  
ZIP: 55042  
E-mail: johnbsnell@gmail.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.  
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I am writing to express my opposition to any new regulation on table saws. I do not oppose Saw Stop technology but would like to reserve the right to choose. Also, I feel Saw Stop technology is in its infancy and that someone will come up with a device less expensive, if given a chance, and possibly one that would fit all saws. Having used power tools all my life (both professionally and as a woodworker at home), I keep safety in mind to prevent accidents. Government regulation is not the answer.

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I am a 52-year old amateur woodworker. My history with power tools goes back to my teen years. I purchase and machine hardwood lumber by the hundreds of board-feet each year. I have had few mis-haps and have never been seriously injured with any power tool. As a matter of fact, the only cut I from a power saw that I can remember happened on a band-saw while in high school back in 1978. And that required only a bandaid.

I owe my lack of injuries to being careful and observing common sense.

I am strongly opposed to the possibility of mandating the "Saw-Stop" technology on any table saw. I am completely ok with this technology being on the market and would consider purchasing a saw with this technology, but I do not want to be forced to buy one.

Given the potential patent infringement lawsuits that will ensue, should this be mandated, I would expect to see serious harm to many companies that manufacture products that are safe, when used as recommended.

I am in the market for a new table saw (as I currently use a cheap contractors saw). I will probably purchase a current model without "Saw-Stop" now while I still can.

The most important safety feature of any tool is the mind of the user.

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I oppose the mandatory rule for table saws. Those at SawStop seek to mandate the use of a single technology, potentially creating a monopoly and undermining the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
Name: Scott Edkin
State: NY
City: Wilton
Address: 10 New Britain Dr.
Address 2: 
ZIP: 12831
E-mail: swedkin@aol.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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While I have seen the technology demonstrated, it does not alleviate the responsible use of table saws and proper safety measures practiced. I don't believe that such a mandated technology would benefit the industry overall, and would otherwise encourage poor safety practices because of the over-reliance on technology to protect consumers.

Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process.

The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
Name: Christopher Knappett
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City: Issaquah
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Address 2: 
ZIP: 98027
E-mail: cjknappett@gmail.com

As an active woodworking enthusiast for over 30 years without a single injury (wood-knocking) to date. The consumer has the responsibility to act/use the tools safely, alertly, un-impaired just as he-she would operate a car or a gun etc. I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. If the ANPR does choose to go forward in the manner so written, so as to encourage the positive growth of saw-stop technology, all design patents and related engineering materials should be "open" and released to other retail manufacturers in the similar tool sector so as to not have the end-item prices controlled by a single manufacturer and hurt the paying customer who is being forced to buy the single source technology.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

(I TOTALLY SUPPORT) the above mentioned paragraph. This will have a devastating effect on the cost of purchasing power saw equipment. I own & still operate power saws for the last 40 years & have (NEVER) encountered an injury to myself from their use. (COMMON SENSE) is the best accident prevention tool in the world.

--------
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ZIP: 29621  
E-mail: 1jcyane@gmail.com  

Consumer Product Safety Commission  
Docket No. CPSC–2011–0074  
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw."

Protection from table saw accidents is a good idea.  
Protection from personal destruction via nuclear bombs is a good idea.  

Not all good ideas require CPSC regulation.  
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Name: Arno Alnutt
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City: Thomaston
Address: 901 Crystal Drive
Address 2: 
ZIP: 30286
E-mail: alnutt1@windstream.net

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. Stop regulations! There are enough regulations for the next 50 years. If table saws must be regulated, there is a much cheaper and effective method out there that does not destroy the blade and other mechanisms thus costing the consumer additional money. I am tired of the government regulating the life of adults. I remain responsible for myself.

--------
Name: Edwin Sweeney  
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E-mail: edsweeney001@yahoo.com

I am an amateur wood worker and I own a well known top of the line contractor style saw that I use on a regular basis and constantly employee prudent safety measures. I absolutely oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology and once again reinforce the notion that "government is the answer". Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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The above sums up my feelings, but please allow me to add something. I have been an amateur woodworker for more than 40 years. I have used the same bench saw since 1973 and have NEVER been injured by using this tool. The reason? I have always been cautious, respectful of the tool, been aware of its' limits and mine. I've always listened to the tiny voice in my head that says 'Don't do that you idiot!'

We do a good job with safety devices and protocols; seat belts, collapsible steering columns, energy absorbing and controlled collapse car frames, anti-locking brakes, automatic traction control, etc. Yet still, with all, people still do stupid things and kill themselves and others. Some safety devices are not needed, not wanted, over-priced, and threaten to price whole populations out of the market.

The recent verdict against Ryobi is a perfect example. A jury giving a man $1.5 mil. for being stupid. Any casual user of a table saw would testify that every thing he did was wrong. Now we are at the point of awarding a monopoly to a guy trying to ram his system through so that he and his associates can enrich themselves in the name of 'safety'.

We can legislate until we're blue in the face, but at some point people have to take responsibility for their own actions. The accident rate is high, but not because of deficient design. The most basic saw is safe if used properly. The problem is, woodworking is a growing hobby that attracts newcomers with no experience who expect to spend a couple thousand dollars, plug, and play. They don't attempt the most basic learning steps. Read the traffic on any woodworking discussion site; no clue about what to do, yet there they go, blindly confident.

If you want to improve safety of tablesaws, make the buyers learn what the hell they're doing. Of course, that would be about as effective as trying to teach people how drive.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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As an editor and power tool reviewer I find the matter to be more of one entity trying to capitalize on its monopoly of current safety technology. If the matter were entirely related to safety, then allowing competing solutions would have been allowed. As it is, I feel one company is trying to have government regulations placed on an industry and the sole recipient of that regulation's windfall would go to a monopolized solution.

The increase in product costs will force table saw users with moderate means to purchase products either on the used market or begin using alternative methods and tools for table saw tasks that will create more injuries than those presently caused by the current lines of table saws.

We support training and the safe use of all power tools. However the costs to make tools that by their very nature cut and shear entirely safe by employing a device that is limited in its effectiveness appears to be overstepping of what the public can and should expect from government agencies.

Where does the regulation stop. Should blenders have rubber blades. Should highways be lined with SAFER barriers throughout their entire length. Yes, technology resulting in safer tools should be employed. But when the costs become prohibitive, we need to step back and make sure that the steps we are taking are necessary, and necessary at this time.

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Name: Howard Evans
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Address: 168 Medford Street
Address 2:
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E-mail: hevans1944@woh.rr.com

"I oppose the ANPR for 'a system to reduce or prevent injuries from contact with the blade of a table saw.' The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

The preceding statement was drafted by the Power Tool Institute, Inc. (PTI) a consortium of power tool manufacturers whose product costs would be adversely affected by any Federal mandate to use patented, monopolistic, "flesh-sensing" technology controlled by SawStop. I agree completely with the PTI statement and their position. The consumer should be free to consult with their saw vendor and choose whether or not SawStop is "right for them," as the drug pushers say on TV. I am not a huge believer in Government mandates "imposed for my own good." I am old enough to remember when seat belts in automobiles were "optional equipment" you had to special-order from the car dealer or purchase and install yourself. This I did do on a '56 Buick in 1967 because as an airman it was the only car I could afford, and I couldn't drive it on base without seat belts. This was a mandate of the Base Commander. Still, I embraced and wore seat belts from Day One because of their obvious cost-to-benefit ratio. However, even if SawStop were not a monopoly but was instead a competitive commodity like seat belts, I would still have second thoughts about using it, much less requiring its use everywhere, like seat belts. Voluntary standards DO work as demonstrated by SAE for automobiles and ASTM and ANSI standards applicable to virtually everything else. The National Electrical Code, a set of standards promulgated by fire insurance underwriters to promote safe electrical wiring practices, has been constantly updated since it came into existence, yet in itself has no statutory regulatory authority. It is however often cited in its entirety as a building code requirement in local jurisdictions. And just as often, other jurisdictions will grant exceptions to certain parts of the NEC Code to avoid imposing undue hardship on contractors. The key element here is choice. Choice is always preferable to mandate in a free society, even if some will choose unwisely.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. By purchasing and using a table saw a person has accepted the chance that an injury might occur due to their actions or a malfunction in a device designed for their protection. I believe that the best safety device is knowledge. I also believe that rules and regulations will not prevent ill informed people from making decisions that are not optimum to their safety. I believe the people should take responsibility for their actions and that industry should not be made responsible for all conceivable accident options.
Don't let one lawsuit and incident redefine the industry. I vehemently oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." Do not mandate the use of a single technology and probably create a monopoly. Consumer saws would disappear because they would be too expensive. CPSC should work with the power tool industry and users of table saws to promote safety. Let the market develop other safety devices so there is fair competition.

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I oppose the mandatory rule for table saws. Please do not inhibit consumers' abilities to purchase table saws by mandating this technology (which is already available for those who wish to utilize it) which will inevitably raise the cost of the equipment by hundreds of dollars. The increased cost will put these machines out of reach for many consumers, most of whom will be the non-professionals without the proper training and knowledge and will attempt unsafe ways around the too-expensive table saws.

Those at SawStop seek to mandate the use of a single technology, potentially creating a monopoly and undermining the development of new table saw safety technology. In addition, the Flesh Sensing technology does nothing to prevent work material kickback or objects ejecting from the saw itself, unlike current safety measures and guards.

Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users.

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Saws are already safe if you use the current technology available and that comes with most saws. Regulating a monopoly into existence is ridiculous.

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
Name: Charles Holland  
State: IN  
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Address 2:  
ZIP: 46060  
E-mail: hollandcl@gmail.com

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Name: John Hartney
State: MI
City: Holland
Address: 1024 E 12th St
Address 2: 
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: James Johnson
State: CA
City: Norco
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Address 2: 
ZIP: 92860
E-mail: jjohnson@headwaters.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Craig Hairmon  
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City: omaha  
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Address 2:  
ZIP: 68104  
E-mail: craigharimon@yahoo.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. I The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.  
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Name: Robert Estoll  
State: IL  
City: Naperville  
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E-mail: robestoll75@gmail.com  

I am against the passing of any regulation requiring the SawStop technology. I believe that the industry needs to work towards an OPTIONAL solution. This technology would give one man a monopoly on this type of device and goes against the very fabric of a free market. It is historical record that Mr. Gass has only sought legislation after he failed to convince the industry that his device was needed on all saws.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." We have enough safeties in place as it is. The reason accidents happen is because of user error. I've never seen any of my tools jump at me and try to cut me. If you remove the blade safety installed on your table saw then you are opening up the possibility of cutting off your fingers. The user manuals that come with table saws warn to never use the saw without the safeties in place.

The mandating of flesh detection technology is not necessary. It will cause a monopoly on the market and ultimately drive the price of table saws out of range for people like myself. I own a ryobi bts21. It was a $250 table saw. That is all I can afford to pay. I've never hurt myself using it because I am a responsible tool owner.

This will only hurt the tool manufacturers and make the person who created the flesh detection technology rich (as they have it patented).

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Name: Sam Keith
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City: Newport News
Address: 14 Scott Rd
Address 2:
ZIP: 23606
E-mail: lu50sketh@cox.net

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw.". The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

I follow the safety measures suggested for my saw and use common sense. To put in regulation because of a lawsuit and misuse by one person does not work.

I ask that we leave things as is.

--------
Name: Nathan Horton  
State: GA  
City: Lawrenceville  
Address: 440 Ashland Manor Dr.  
Address 2:  
ZIP: 30045  
E-mail: nshorton@gmail.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
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City: Lincoln  
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Address 2:  
ZIP: 68588  
E-mail: kwulser@unlserve.unl.edu  

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw. It should be left to the discretion of the hobbyist as to the type of protection they would prefer. Litigious individuals will be able to find fault with any protection system. Woodworking by its nature will always require thoughtful and considered planning regardless of the tool used. Any protection system considered should also take into account the costs involved. After all, if one were to, for example, require a $10,000 system, injuries would drop dramatically, but at what price to the thousands of woodworking enthusiasts?  

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Enough already! The ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw" represents the WORST of heavy handed government regulations in that it gives a virtual government-sanctioned monopoly to a single person. This is FAR less about safety than it is Stephen Gass' crusade to mandate we purchase HIS product. If safety IS the issue then why not require we all wear helmets while riding in cars?
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

I would also like to ask about the tens of thousands of table saws that are already in use and what is to be done about these. Or, doesn't the CPSC care about those? I would have to believe that if I just recently bought a table saw with no safety technology, I would not be in the market for another "safer" table saw.

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E-mail: pdorsey118@yahoo.com

I oppose ANPR for two reasons. Number one, the incident that started this action. Mr. Osorio should not have been allowed anywhere near a table saw without the benefit of proper instruction. Any child in the first week of shop class knows one should use a fence when making a rip cut on a table saw. I think his employer should have been responsible for his ignorance.

Number two, Mr. Gass, it seems, would hold a monopoly that would not allow any new development of table saw safety technology. I pray the CPSC uses better judgment than the courts did in this matter.

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Name: Bob Lyon
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

I would embrace the demand to implement such technology only if the patent and licensing standards were changed so that you do not create a monopoly for the SawStop company. Only if the licensing fee were eliminated would this be an equitable situation for all of the other makers of tablesaws.

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Name: Sidney Thompson  
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Address 2:  
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E-mail: sidt@engr.uga.edu

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I have been an avid user of table saws for more than 30 years as both a professional and home woodworker. I have used all types of table saws with very few safety devices in place with the exception of the brain that the good Lord gave me and I have yet to have any kind of serious accident. Not only do I use table saws, I teach others how to safely use table saws and have no injuries that I am aware of with any of my students. I think the Sawstop product is a good one for those who can afford it so that they can work without regard for safety but I think a better choice is to get trained on the tool properly before setting out to use it.

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

Please don't make this technology mandatory. It should be voluntary for manufactures so that they can remain competitive in the market with quality products. Mr. Gass should not be further aided in his quest to make money off of the ignorance of unskilled laborers.

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Name: John Holz  
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The hazards of operating a table-saw are obvious to the user. Choices of safety equipment are available in the marketplace, including riving knives, articulated blade covers/guards, and the SawStop machines. Additional rules and regulation are inappropriate "nanny government". If people want safer table-saws, they can but SawStop machines. If manufacturers want to produce safer machines, they can invest in the development of safer designs or seek to license technology/disigns from SawStop. Let the free market operate freely. No more regulation, please.

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Let's narrow this debate to some facts. Anything that the CPSC can do to decrease or prevent table saw injury is a good thing. But, there are legitimate concerns over how this would happen. Does the technology offered by Sawstop need to be mandated? Will this technology be offered, as well, in band saws, scroll saws, wet saws, circular saws, radial arm saws, miter saws, etc? Who is going to benefit financially from the decision to mandate this new technology? Is this new technology practical for all manufacturers of table saws? Will this force companies to raise their prices if a law is enacted and will it hurt business as potential customers decide it is too expensive?

I don't believe table saw safety should be mandated, but I do believe it is the responsibility for all men and women to practice sound safety habits when working under potentially dangerous situations. Mandating such technology will open Pandora's box to a plethora of other hazards in our society. A little common sense and good judgement is all we need.

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Below you'll find the full text of what the lawyers want to make sure we say in opposition to this new requirement. I'm leaving the boilerplate so as not to miss anything, but let me put it simply: If you mandate that everyone uses flesh sensing technology, then you'd better void the patent and make it available to all manufacturers for $0 added cost. I work in high tech, a field well know for it's patent disputes. However, nowhere in my software career has the federal government REQUIRED a specific, patented technology to be utilized. Let the market decide ho best to protect consumers. (As an aside, I think the ruling in this case was ridiculous to begin with .. The user defeated EVERY safety measure on the saw, used it in ways contrary to the operators manual, and then sued the manufacturer. "Ridiculous" would be putting it kindly.)

So here's the boilerplate:

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Please do not mandate that I participate in a technology that is thought to be in MY best interest. I have been using a table saw for more than 50 years without harm. This technology, as safe as it may seem, SHOULD BE A CHOICE (not a mandate). The excessive price will prevent many of us from purchasing the unit ultimately depriving us from the profession or the hobby we love. There are millions of woodworkers in this country. Don't make a rule for the extreme minority.

Let the market develop as it will. If the safety, price, weight, and design of the units fall into place, everyone will buy one. Please don't force the issue through regulations.

Incidentally, this entire issue seems to represent a technology that creates a monopoly. Consequently it undermines the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
I have watched with interest the controversy surrounding tablesaw injuries and have worked on tablesaws for many years. I own the saw that was used to start this controversy. It is a very low end saw and because of that the accessories are very cheap. I would submit that a good portion of tablesaw injuries are caused from unsafe practices and improper training. Get an instruction book and see if there is enough information about safe practices. I cannot see that a table saw is inherently more dangerous than a chisel or knife if used carelessly. I would say that a better system of guards would be used if they were better engineered. My own experience with the guard on my delta contractors saw II is I have to get my fingers dangerously close to the blade to get the guard out of the way of a push stick which I believe is a more essential piece of safety equipment than the guard. I submit that a dust shield, riving knife(big splitter), a properly set fence that locks square to the blade, and a push stick would prevent most table saw injuries.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

Where is the expectation for personal responsibility? Please quit trying to save me from myself at the profit of others.

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I oppose the mandatory rule of legislating the use of one proprietary technology for table saw safety. This is not the only solution and it is very anti-free market. No more regulations please.
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E-mail: retroaces@yahoo.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a
table saw." The ANPR would mandate the use of a single technology, potentially creating a
monopoly and undermine the development of new table saw safety technology. Instead of
imposing a single technology that may not be appropriate for all table saws, CPSC should work
with the power tool industry and others in the table saw community to promote safety through
the voluntary standard process. The standard, ANSI/UL 987, already is working, has
demonstrated positive acceptance by table saw users, and is in the best interest of safety.

I feel that the CPSC should not be in the business of handing a monopoly to SawStop. As a
consumer, I should have the right to decide what kind of wood working technology best suits my
expertise and wallet. The CPSC should not be in the position of acting as a parent.

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I am against any regulation that would force manufacturers of table saws to include a SawStop or SawStop-like technology to prevent users from contact with the saw blade.

Why? Such regulation would put the price of a table saw beyond the reach of many and would give the SawStop company an unfair edge over many other fine manufacturers of table saws.

It would be far more advantageous to start a campaign to promote table saw safety.

We need more contractors and woodworkers, not fewer. Any such regulation would raise the price of all table saws, including entry saws, which in turn would reduce even further the number of potential woodworkers.

Woodworking is a craft and an art. Let's not kill an already endangered art by imposing more regulations on the manufacturers of table saws.

Regulation-free competition will achieve the same goal in time.

PS: I am a retired woman who enjoys woodworking. I purchased a SawStop contractor's saw last year to replace a 30-year old table saw that had seen a lot of use and which helped me refine my skills over the years. I bought a SawStop because I could afford it and because I had been using one regularly at a local Woodworker's Club and liked it very much. However it must be noted that I would not be a woodworker today had the cost of my first table saw been more than I could have afforded as a school teacher.

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E-mail: drhimler@aol.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

Please do not penalize the industry or the consumers for the blatant stupidity of one individual, who failed to read the instruction manual. What should have been a simple workman's compensation issue has potentially morphed into a potentially cost-prohibitive industry killing government intervention.

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the biggest problem in mandating sawstop technology is the added cost and expense of not only purchasing the device, but having to stop work and get a replacement part. I have been woodworking with power tools for over 35 years, and have never had an accident with them. I have also read and been taught safety rules for the tools. Those that do not have the common sense to learn or ask how to use these tools will always have accidents. you cannot legislate stupidity out of existence. Just as you would not have an untrained fool practice law, all tools require training before use.

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I am writing to you today in regards to the decision of sawstop style technology. I don't even know where to begin. Having used extensively both bolt to the floor quality cabinet style saws to cheap home depot throw away models. Having sawstop technology will not stop anything. Mr. Gass is just trying to shove his patent down our throats, and the vast majority of us do not want it. The fact of the matter is his technology does ZERO/ABSOLUTELY nothing to prevent kickback. Having been on the receiving end myself of such a kickback. I can personally say its a "less than desirable" event. Would sawstop of helped me then? Nope. In fact Mr. Gass must rely on industry standard guards to prevent such an incident. The fact of the matter is, no matter what you do to a saw to make it safer, its easily disabled. Mr. Gass himself states that the reason there are so many accidents is because people disable or remove the safety guards that come standard with a saw. What makes his system any different? Especially on a job site where people routinely cut through nails and screws and use green or wet lumber. No contractor is going to burn up 200 dollars a day and lost productivity because somebody cut through a nail in a board. Quality guarding, and a workable riving knife system is more realistic. If you must force manufacturers to do anything. Make them invest in regional training sessions. The fact of the matter is a table saw is no more dangerous to a conscious well trained user than a common kitchen knife is. In Conclusion. Safety is top priority however sawstop technology is not the answer in this case. The answer is useable, quality guarding.

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Address 2:
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E-mail: rgnorman1974@gmail.com

"I OPPOSE the mandatory rule for table saws or any other saws for that matter. Thank you for your consideration.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." I am sick and tired of governmental intrusions into every aspect of our lives. We are now told what light bulbs we may or may not use in our homes. You are not allowed to build an aircraft plant in a particular state. The list goes on and on forever, with most of the rules being for our own good and for our personal safety.

Whatever happened to personal responsibility? Apparently the public is too dumb to be careful and not get hurt. Well, maybe we are but being dumb is a right, too. Let us alone to wise up all by ourselves. It is just possible that we are smarter than the government thinks.

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I am opposed to Federal Government mandating tool construction because there is no telling how far it could go. I have drawn more blood with a wood chisel, so would they be outlawed or have to be somehow made safer to use? Let common sense prevail.

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Name: Todd Margo  
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Address 2:  
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E-mail: todd.l.margo@gmail.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I wish to express my opposition to the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." This ANPR would have the effect of mandating the use of a single technology (owned by the company originating the petition), creating a monopoly and undermining the development of new table saw safety technology.

Additionally, imposing a single "one size fits all" technology that may not be appropriate for all table saws (e.g. bench top saws). I urge the CPSC to oppose this ANPR and alternatively work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process.

I agree that SawStop technology is good. I am an owner of a Sawstop cabinet saw. That was my free choice to make. But, the technology is most beneficial mainly to table saws which meet Sawstops specifications. Sawstop trunnion and arbor are specifically designed to handle the stresses encountered should the braking mechanism trigger. This is why I paid more money for the saw; I knew it was a more robust design. Once again, that was MY FREE CHOICE, which should remain the case for all future table saw shoppers. One size does not fit all, and should not.

The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. There are other matters that make this proposed action wrong. The government can't effectively create rules that prevent stupidity. As a woodworker of over 50 years, I applaud the inception of riving knives on table saws instead of splitters. As I travel to fellow woodworker's shops, however, I RARELY see blade guards in place---indeed I rarely use mine! Where it "may" be appropriate to have some sort of flesh sensing technology installed on saws used in industry or in schools; I think that this proposed rule would give an advantage to a company that in MY opinion makes a saw that is otherwise inferior to the Delta Unisaw or the Powermatic 66. In addition unless the rule would require that Mr. Gass and his company license the technology to the competing manufactures at no charge, the rule would place an undue financial burden on the average hobbits woodworker. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I used a table saw almost daily in my work as a carpentry contractor for over 35 years. I have never used a blade guard. I always use the fence, a reasonably sharp blade, push sticks and I make jigs to make the more dangerous cuts safely.

I feel the hysteria over the Osorio vs. One World Technologies, Inc. lawsuit is way out of proportion. I completely disagree with the verdict. If you circumvent the safety features and don’t learn how to use the saw safely; how can you only be 35% liable? He did work there a year already. He had obviously used this technique before, albeit without injury. I always thought you could only go into a court of equity with clean hands, not being guilty of contributory negligence.

If you make this safety device mandatory, which is SawStop’s, self-serving, for profit position, please consider every other tool, ladder, knife, automobile, chemical, food, beverage, plastic bag, rope, etc, which could be used incorrectly and cause bodily harm illegal.

Someone could sit and stare into my laser level until they damaged their eyes. Who would be liable for that? The laser maker, the store where I bought it, the battery company who made batteries that last so long you could stare long enough to hurt your eyes, the client who wanted me to put the window, door, cabinet, addition or whatever up level or even myself? Certainly it could not the person who hurt himself or herself. When will people take responsibility for their own actions?

I agree with the Power Tool Institute’s view below.

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. Mandating that small businesses buy new, more complex and expensive tools will hurt the construction industry, and undermine any positive gains from such a law.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
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I oppose the mandatory rule for table saws. Those at SawStop seek to mandate the use of a single technology, potentially creating a monopoly and undermining the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users.
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Please stay out of my workshop. I go there to relax and enjoy myself. I know how to use my equipment safely. Please let me be.

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As a woodworker, the son of a carpenter and a member of generations of American construction workers I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." To mandate the use of a single technology would create a monopoly and undermine the development of new table saw safety technology. CPSC should not be used as a means for making vast profits for a single entity at the expense of limiting further development. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users. I strongly urge CPSC to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. Further, the power tool industry might better ensure the safety of power tool users by pooling resources and intellectual effort to invent superior safety provisions that are open source designs that all power tool manufacturers can adapt to their own otherwise proprietary designs. As an aside, if a table saw protection device can be invented that does not destroy blades and the protection device (like the Saw Stop device does), table saw users will have even more to celebrate.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." beyond those already provided on ALL saws. The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. If the current patent holder is interested in consumer safety, then they should release the patent to all manufactures, fee free. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I am opposed to any legislation which will force me to use any particular device on my power equipment. I would rather be given the opportunity to choose which device I want to use. Any ruling which would force manufacturers to use a certain device and not any others is basically the Government forcing a monopoly upon the citizens of this nation.

In particular, I am refering to the proposal to force manufacturers of power saws to use the SawStop device over any others. I urge you to not approve the ANPR mandating SawStop devices on all saws, and instead work to produce a safety standard which would allow many different types of safety devices to be implemented.

Perhaps a better idea would be to require mandatory safety training. If you need to have a license to drive a car, which means taking a training course, why not require a training course for using saws?

That would be better than a government-imposed monopoly!

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The consumer has been well informed of the current ability to minimize injury using technology such as that provided by flesh sensing table saws. At this point, it has become a choice by the table saw user to continue use of non-sensing table saws. I expect my personal choices to be respected by my government, it is for this reason that I; Oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Lee Buescher
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Address 2: 
ZIP: 55364
E-mail: lbuescher@gmail.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: William Buescher
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"I oppose the mandatory rule for table saws. I don't want one company having a monopoly on the saw stop technology. I want the saw makers to be able to provide different technologies and at different prices. It is similar to automobiles, some people can afford a BMW with advanced safety while others buy a used car. This rule may just keep people using old saws instead of buying new due to the excessive cost.
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.  
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw. It should be left to the discretion of the hobbyist as to the type of protection they would prefer. Litigious individuals will be able to find fault with any protection system. Woodworking by its nature will always require thoughtful and considered planning regardless of the tool used. Any protection system considered should also take into account the costs involved. After all, if one were to, for example, require a $10,000 system, injuries would drop dramatically, but at what price to the thousands of woodworking enthusiasts?"
I urge you to oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw," which would mandate a single design standard, creating a monopoly situation and hindering the development of additional new safety technology.

The ANSI/UL 987 standard, is working well and is in the best interest of safety.

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Name: James Montgomery
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: John Barnhill  
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. A monopoly has never benefited the majority.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. It is interesting that ANPR should be in the business of 'creating' a monopoly, especially in a free enterprise market. Instead of imposing a single technology that may not be appropriate for all table saws let the market and purchasers dictate what will become the new standard. Woodworkers are a very safety oriented group and will purchase products that will reflect that concern. One of the major problems in the USA today is that Legislators think they know what is best for everyone else. If they keep their fingers out of what they know nothing about and allow the public/market to operate, things will improve. It is funny that saws in Europe with riffing knives have been available for years. Where was ANPR to legislate that innovation into the USA? As to the 'numbers' figures never lie but liars figure! CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw."

I am an architect and hobbist woodworker and I have been working with table saws and other power tools for most of my life. These tools are not inherently dangerous if used properly and the idea that the government would require manufacturers to include an extremely expensive safety system on their saws is absurd and an excellent example of government intrusion into our lives.

SawStop is out there, and selling very, very well. In fact I am strongly considering purchasing a SawStop table saw in the next few years as my children get out enough to teach woodworking to. But that's my choice - I'm choosing to spend a significantly larger sum of money on their saw than another manufacturer's saw for the added safety. I should also be free to chose otherwise, and if I did not have children I most likely would chose otherwise. Again, I have been using table saws for over 20 years with nothing even resembling an accident.

SawStop makes an excellent and wonderful product, and the table saw purchasing public is aware of it. Please allow the market to dictate matters like these. There is no doubt in my mind that if this remains voluntary, eventually the other manufacturers will follow suit - because it will hurt their bottom line not to. But please don't make a decision that would make it financially difficult or impossible for many people to pursue woodworking as a career and a hobby. Table saws are essential to any shop, please let us be adults and chose what is best for us, and let's all hope the concept of personal responsibility makes a comeback soon.

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I oppose the mandatory rule for table saws. Stupidity and carelessness should not be legislated against. Legislation that mandates the use of a single technology, potentially creating a monopoly and undermining the development of new table saw safety technology, is an unfair breach of fair competition. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users.

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I have been a woodworker for more than 40 years. I accept the fact that it involves certain risks to my various body parts! And I still have them all intact. Why? Common sense and caution.

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." CPSC should work with private industry and the table saw community at large to promote safety through the voluntary standards and training.

I suggest developing training rules for individuals in the construction industry prior to starting in the trades.

The problem isn't the table saw, it's the stupidity of the user.

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I am vehemently opposed to your (CPSC) efforts to impose on the American public a new rule for tablesaws which would put into place "a mandatory system (Saw Stop) to reduce or prevent injuries from contact with the blade of a table saw."

I am a woodworking woman over the age of 60 who has at least as much life experience and wisdom as any of you on the commission, and I highly resent government entities, such as yours...continual efforts to infantilize me. Do not presume to know what I need. I do not require or want a governmental 'mommy and daddy' to protect me from myself! If I may, let me put it to you more succinctly..."Knock It Off"!

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We do not need more one-size-fits-all mandates from the federal government! A nanny government is not going to prevent injuries from those who are irresponsible and use tools in an unsafe manner. These regulations would increase costs to consumers significantly, create a monopoly to one company, and prevent lower income people from being able to purchase such tools.

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw."

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." It appears that the ANPR would require the use of a single technology, potentially creating a monopoly and limit the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Rick Stout
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Name: Robert Cook
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E-mail: bobcook48@comcast.net

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I STRONGLY oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

Technology is not a good substitute for common sense and education. Most all injuries related to shop tools are due to user error. I have been using shop tools for 40+ years and have NEVER had even a minor injury - why? - because I learn how to safely use each and every one of my tools BEFORE I start to use them.

As it is often said "You Can't Fix Stupid" and this situation is no exception.

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E-mail: taildragger.96@comcast.net  

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.  
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Name: Terrence Houston
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City: Cincinnati
Address: 4191 Race Rd
Address 2:
ZIP: 45211
E-mail: terryhouston@yahoo.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." Mandating this technology will make new table saws too expensive for many, many people, and while table saws are inherently dangerous, they are much safer than the alternatives, such as hand-held circular saws. Other table saw improvements such as effective guards and riving knives are worthwhile, but this system is not.

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I am a Sawstop Professional Cabinet Saw owner. I made the decision to purchase this saw because I deemed the additional costs of having this technology was a wise investment AND because I was in a financial position to absorb the premium cost in exchange for the insurance of the safety protection. Even after I decided I could afford this saw, I still vacillated between it and a Powermatic with pretty much the same features at about $500-600 less money. My personal driving decision was that I have 3 young children who come into my workshop and I knew they would one day want to use my saw. However, I am opposed to a ruling that will mandate incorporating this technology on every table saw.

1. Operators should be able to assume whatever level of risk they are willing to take.

2. Mandating the inclusion of Sawstop technology would eliminate many people from having a saw that they are willing to assume the risk of use. Furthermore, many will resort to other affordable practices like rigging circular saws upside down on a platform which I believe will be more dangerous than using these inexpensive table saws that lack the Sawstop safety technology.

3. A mandate could give buyers a false sense of security and diminish the concept of being absolutely certain you are not going to end up in the blade.

4. The system can be circumvented, and must be circumvented to cut certain materials.

I support voluntary compliance and recognizing those companies whose products are safer. I support the concept of letting the table saw owners choose the level of technology they want to invest in.
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As a woodworker of 40 years, I oppose mandating the SawStop technology for all table saws. Woodworking as a hobby is available and affordable to almost everyone. More government regulation will only increase the costs and thereby decrease the availability of woodworking equipment for the average hobbyist. Just as motorcycle helmet laws are left to the states, so should table saw technology be.

The CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw."

While the goal of increasing safety and reducing injuries is admirable, this effort is seriously flawed and misguided. Mandating flesh-sensing technology would effectively create a windfall for SawStop and stifle development of other safety technologies that could provide similar protection without the drawbacks of the SawStop system (cost, complexity, false activations, etc.).

While the SawStop system is impressive in demonstrations, in the real world it probably won't be very effective for one simple reason: After the first or second time a table saw user experiences a false firing of the system and has to spend nearly $200 just for the parts to fix it, they will disable it in order to avoid this cost. This is a fundamental flaw in the SawStop approach.

There are other safety systems in development that do not suffer from this flaw and would provide similar protection without the cost and inconvenience to table saw owners. Mandating flesh sensing technology would prevent these devices from ever coming to market and impose an undue burden on both table saw manufacturers and table saw users.

Technologies that are already in place, such as riving knives and quick-attach/detach blade guards have proven to improve table saw safety substantially, but for some unfathomable reason, this was not considered in your hearings. That demonstrates either a clear bias or negligence in your investigation, neither of which is acceptable. This data, both from domestic and European sources (where they have been in used for many years), MUST be considered in any discussion on table saw safety.

Creating a reasonable PERFORMANCE standard in consultation with the power tool industry is the proper approach to improving table saw safety; mandating a specific technology is not. A performance standard will promote development of safety technologies rather than stifle it, resulting in more - and likely better - choices for consumers.

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Name: Brian Nystrom
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I am very opposed to the idea of REQUIRING all manufacturers to utilize the sawstop technology on all table saws. The lawsuit that started this fiasco was a travesty of law in this country. The outcome is as shameful as would be outlawing all stupidity in this country. Mr. Gass is out for Mr. Gass. If he wants safety he could give the technology away or lower the cost. Even then, the consumer should have the choice and the risk of not having the technology. Standards on this sensing technology should be VOLUNTARY, not mandatory.

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I am a woodworking hobbyist, and oppose this mandate on a single technology (sawstop flesh sensing) for reasons stated by the CPSC. As a woodworker of 35+ years, I feel it is my responsibility to monitor the proper implementation of safety equipment on my tools. My concern is one primarily of cost being added to an already expensive tool. Secondly, this would open the flood gates for the same technology on all other power tools. Where do we draw the line. Are we going to see flesh sensing technology on our bench chisels, screw drivers, hand planes.... By no means do i advocate, an unsafe work environment, but to have extra cost forced down my throat by one individual, and a bunch of attorneys looking for the cash cow in my field makes bad sense. If I wanted this technology it is already available to me, and that is the way it should stand. Allow the tool manufacturers to implement it on their own, or develop their own competing technology. I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.  
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Name: Brian Marshall  
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Having experienced a saw accident, I'm all for safety, but competition in the marketplace will provide the best solution, not another government mandate.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Tom Bijak  
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." As a small business owner in the Construction industry, we use many different types of power tools with saw blades capable of resulting in serious injury when not properly used on the job site. Table saws are only one such tool and constitute no more than 5% of total saw-equipped power tool use in our work. The other tools include mitre saws, circular saws, reciprocating saws, tile saws and many more which are used 95% of the time during our daily work. Table saws are sometimes the best and safest tool for certain cutting tasks on the jobsite. Table saws are already very expensive job site tools relative to the other tools found on a job site. If the ANPR is enacted, the cost of using a table saw on the jobsite would be raised so high that carpenters/laborers would resort to using less capable and even more dangerous circular saws to doing the work that jobsite table saws do today. This would be a very dangerous unintended consequence of passing the ANPR.

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Passing legislation/rules that substantially raise the cost of Table Saws will result in more job site injuries-- even after factoring in the table saw injuries prevented from the new safety technologies. I also believe passing the legislation will result in more "casual woodworker homeowner" injuries when cutting wood. Why? In the past, hand-held Circular Saws were used for many of the cuts that are now being handled by low cost/widely available job site and homeowner table saws. If job site or homeowner Table Saws become less accessible due to major cost increases, the cuts will once again be made by far more dangerous Circular Saws-- whether in the hands of highly skilled professionals or untrained workers/homeowners.

I'm sure there are more table saw injuries today on the job site than there were years ago when table saws didn't have the price/form factor making them widely available. Are the powers that be smart enough to factor in the relative dangers of table saws versus circular saws for rip cuts?

Also, adding costly technology like SawStop to a $1,500 stationary/shop table saw (the ones bought by professionals or serious woodworkers) makes more sense as the percent cost increase would be much less than the percent cost increase on $300 job site or homeowner portable saws. I hope the unintended consequences of increased (and more dangerous) circular saw usage on the job site and by the homeowner is carefully considered before actions are taken. You need an economist to make clear the price elasticity relationships involved in this potential legislation. You also need a construction/woodworking safety expert to make clear the relative dangers of circular saw usage versus table saw usage before making a decision on this.

I'm a remodeling professional and know it is a lot safer making certain cuts with today's job site table saws than with a circular saw. If you make these portable saws less accessible to small business owners like me and to casual woodworking homeowners, you will see far more circular accidents.

P.S. I made a previous submission, but did not make the above points as clear as I now believe they are expressed above. Sorry for double posting.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. So, should flesh-sensing technology be required in table saws? Yes, but not yet. Let the market do what it does best - drive manufacturers to build what the public actually buys, and innovate to create competing technologies. Saw-Stop's proprietary technology has already found a wide market and the trend will continue - without government regulation.
I have been involved in woodworking as a hobby for 30+ years and learned what to do and not to do through reading and am AGAINST a mandatory rule for table saws.

SawStop's idea should not be forced on manufacturers. That could create a SawStop monopoly and prevent manufacturers from developing better solutions.

The CPSC and the power tool manufacturers should work together so different solutions can be offered to the consumer instead of forcing one solution on everyone.
I strenuously oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." I have used power tools of all kinds for over forty years as have most of my family members who have been amateur wood workers as well as working in the trades. I have also worked with many youth groups for nearly 20 years to teach and train young people to properly and safely use power tools. All of this has occurred without any accidents. As users, we have assumed responsibility for our own knowledge, understanding and training of the equipment we are using. Additionally, I find that other restrictions have made it difficult for your people to obtain proper oversight, training or experience in the proper use of power tools and equipment.

Adding this mandatory guard will do nothing to teach individuals the skills needed to be safe. As has often been said this could even lead to a false sense of security and potentially irresponsible use of tools.

If optional guards or other safety devices are available then users can make up their own mind of whether to purchase or use it but a single specific technology should not be mandated for every tool and every person regardless of their training and background.

Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process as well a good training and providing hands on experiences for those wanting to learn new skills.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. Injuries from table saws are caused by poor judgement on the part of the individual using the tool rather than any inherent deficiency of the tool itself. Table saws are obviously dangerous and require care during use, but not through any deficiency in their design or manufacture. Adding SawStop braking will lull users into a false sense of security that will result in new and inventive ways for them to maim themselves using the tool.
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. That is a terrible idea. One would think common sense would prevail, but, unfortunately, common sense is all to uncommon. There are other ways, many other ways, to reduce or prevent injuries from table saws. Those other ways should be allowed to be offered as a choice to the buying public, rather than to dictate a singular, monopolistic device as the only solution available to the public.

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I definitely oppose the ANPR’s potential mandate for a single system to reduce or prevent injuries from contact with the blade of a table saw.

A determination that we, the consumers, must use a single technology to solve the potential safety problems will really undermine the development of any other solutions and the development of other table saw technology since it would all have to be tied to the single solution.

The CPSC should work with the power tool industry and others in the table saw community to develop solid cost-effective ways to promote power tool safety through the voluntary standard process; Such as has been achieved with ANSI/UL 987.

Let's not stifle the huge creative potential that can be brought to bear on this challenge by creating a rule that limits development and creates a monopoly.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." There are many safety devices already in use which protect all but the most careless of users. The cost vs. risk of the proposed rules are way out of line. The biggest consequence of the proposed new ruling would be to reduce the ability for woodworkers to purchase new table saws. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.  
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Passing legislation/rules that substantially raise the cost of Table Saws will result in more job site injuries— even after factoring in the table saw injuries prevented from the new safety technologies. I also believe passing the legislation will result in more "casual woodworker homeowner" injuries when cutting wood. Why? In the past, hand-held Circular Saws were used for many of the cuts that are now being handled by low cost/widely available job site and homeowner table saws. If job site or homeowner Table Saws become less accessible due to major cost increases, the cuts will once again be made by far more dangerous Circular Saws— whether in the hands of highly skilled professionals or untrained workers/homeowners.

I'm sure there are more table saw injuries today on the job site than there were years ago when table saws didn't have the price/form factor making them widely available. Are the powers that be smart enough to factor in the relative dangers of table saws versus circular saws for rip cuts?

Also, adding costly technology like SawStop to a $1,500 stationary/shop table saw (the ones bought by professionals or serious woodworkers) makes more sense as the percent cost increase would be much less than the percent cost increase on $300 job site or homeowner portable saws. I hope the unintended consequences of increased (and more dangerous) circular saw usage on the job site and by the homeowner is carefully considered before actions are taken. You need an economist to make clear the price elasticity relationships involved in this potential legislation. You also need a construction/woodworking safety expert to make clear the relative dangers of circular saw usage versus table saw usage before making a decision on this.

I'm a remodeling professional and know it is a lot safer making certain cuts with today's job site table saws than with a circular saw. If you make these portable saws less accessible to small business owners like me and to casual woodworking homeowners, you will see far more circular accidents.

P.S. I made a previous submission, but did not make the above points as clear as I now believe they are expressed above. Sorry for double posting.

Previous Comment:

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." As a small business owner in the Construction industry, we use many different types of power tools with saw blades capable of resulting in serious injury when not properly used on the job site. Table saws are only one such tool and constitute no more than 5% of total saw-equipped power tool use in our work. The other tools include mitre saws, circular saws,
reciprocating saws, tile saws and many more which are used 95% of the time during our daily work. Table saws are sometimes the best and safest tool for certain cutting tasks on the jobsite. Table saws are already very expensive job site tools relative to the other tools found on a job site. If the ANPR is enacted, the cost of using a table saw on the jobsite would be raised so high that carpenters/laborers would resort to using less capable and even more dangerous circular saws to doing the work that jobsite table saws do today. This would be a very dangerous unintended consequence of passing the ANPR.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

I agree with the above general statement regarding the mandate of a specific technology. What I most disagree with is the fact that all competent and careful woodworkers are being required to adapt due to the stupidity of one person. Everything Mr. Osorio did was WRONG, not because me or any other woodworker forced him to do it. It was totally his responsibility and possibly his employer's for his competence and safety. Yet because he acted irresponsibly the Gov't feels the need to change the rules for everyone. Sadly this is the mindset in our country now, there is no personal responsibility, it is someone else's fault when something bad happens ot somebody. It's time to stop punishing the whole for the incompetence of the few.
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I strongly oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, creating a monopoly, undermine the development of new table saw safety technology, AND drive up the costs of new table saw so that the average do-it-yourselfer would be unable to buy a table saw. Not only is there the additional cost for purchasing a new table saw but what are the additional costs should this saw blade stopping mechanism be used.

Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

What if this technology doesn't work or fails? What will be manufacturer liability costs be? This implementation will not effect the table saws that have already been sold. Hence the manufacturer liability would still be in effect.

I, personally, did have a minor table saw accident. I sued no one since I was the one who screwed up - not the manufacturer. We do not need more government regulation to protect ourselves from our own stupidity or ignorance.

Again, I strongly oppose ANPR effort.

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I don't believe that regulation is the answer to the problem. While I agree that the saw stop technology is a great value to the woodworking community, and hope to own one myself one day, I think that giving one company a government enforced monopoly is a terrible idea. This would cause the cost of the saws to sky rocket in an already expensive market and would cost thousands of people to lose their jobs in the manufacturing industry. Saws have been around for a long time and when used properly they are safe as is. I believe that this is not only a violation of common sense but also one of the antitrust laws and an ethical one. If this technology is to be supplied by only one manufacturer and be required then the price should be cut and capped and provided to all manufacturers for this discounted pricing to make it fair.
I am a professional woodworker and general contractor in business for over 25 years. I am writing to oppose the ANPR tablesaw prevention technology from being mandated. While safety is a paramount concern, the CSPC should not be in the position of supporting a government-sanctioned monopoly for the Saw Stop technology. This action would hamper further development of other methods.

A further unintended consequence of the adoption of the mandatory SawStop technology would be an increase in much more unsafe practices by those unable to afford the new products.

I believe the voluntary safety standard ANSI/UL 987, is in the best interest of all.
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
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I, Louis M. Wilen, STRONGLY oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology.

Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: John Collier  
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. The SawStop technology is a good one but the government has no place in mandating it as the only game in town. While Mr. Osorio's accident was unfortunate AND PREVENTABLE the court and jury were incorrect in their assessment of the reality of the situation. Regulations that issue from a place of ignorance are just that, ignorant regulations. We have enough of those already.  
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I absolutely oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." I have been a woodworker for many years and fail to see the need for government mandated "Sawstop like" devices. ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process and education of the public on the proper and safe use of any saw. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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First, let me say that I'm aware that the end of this mail includes a copy of boilerplate language provided by the power tool institute. I include it verbatim as I completely agree with it. Second, although I currently own a SawStop table saw and reccommend them, I am very much opposed to requiring the specific technology. My choice to use a SawStop is just that, a choice. While it seems to be the wisest choice in the current market, I would very much like to see competition in this market. Effectively mandating a single technology leads to stagnation and harm to consumers.

Finally, here is the boilerplate:
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. 
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I am a Construction Safety Professional and former Union Carpenter. Over 41 years of experience with managing worker safety on construction sites, the greatest frequency of injuries has not come from contact with the blade but from misuse of other safety features on the saw. Kick-backs can severely injure and, unlike injury from blade contact, they can kill the worker. In 41 years, I have not had one blade contact injury . . . I have had a number of injuries due to the blade kicking the material back against the worker.

You need to let the industry, not a specific manufacturer, provide appropriate solutions to the total of the problem.

The smaller table saws are indispensable to the work we do now. Do not set standards that will reduce their presence on sites.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: John Anderson  
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Mike Meade
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I have been a professional carpenter for 30 years; I have witnessed and/or suffered several accidents involving table saws. I am not keen on the saw stop technology, it does nothing to prevent kickbacks which causes many accidents and injuries. It is also too expensive and not fully thought out or developed. Other inventors can design safety mechanisms that will not result in ruining blades or parts of the mechanism as saw stop does. The flesh sensing technology will also make some people complacent and the other types of injuries will result.

It is not the best technology and should not be installed on all saws.

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Grafton Cook  
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. I am well able to determine the safety risks that come with the use of a table saw, and do not need the CPSC to mandate ITS definition of what IT views as a problem. I am happy to be responsible for my own safety.  
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Please do not create "mandatory" rules where none are needed. The only "need" here is to Mr. Gass' lifestyle. Please consider the common man!

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR should work with the Power Tool Institute to formulate a comprehensive safety program not only for Table Saws, but all woodworking equipment. The Saw Stop is a good invention, yet it does not solve the kick back issue, which in my opinion, is a larger safety issue. Many end users are not properly trained on how to operate machinery in a safe manner.  

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This is a complete waste of my tax money! I don't need the CPSC to help me stay safe. I can take care of myself; Thank You very much. I do NOT like the idea of giving a monopoly to anyone. I am beginning to feel that perhaps this should be looked into from a criminal standpoint. Don't fix what is working just fine.

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Those of us who use table saws daily are well aware of the potential dangers of these machines. They have been used countless numbers of times without injury. The imposition of single source technology to protect the uninformed, untrained or careless user would unfairly benefit the single source of the proposed technology and unfairly burden those of us who count on this technology for our livelihood.

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I oppose the rule requiring the blade sensing technology from Sawstop designed to reduce injuries from contact with the blade of a table saw. Other technologies and practices should be allowed that could result in equivalent safety results. The CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process.

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"I oppose the mandatory rule for table saws. Those at SawStop seek to mandate the use of a single technology, potentially creating a monopoly and undermining the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users."

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I oppose the ANPR for "minimizing injuries from tablesaws" As a Certified Industrial Hygienist with 35+ years of hands-on experience in Safety and Health Management as well as a hobby woodworker, I have seen the use/abuse of tablesaws and other machine guarding efforts first hand. In my personal and professional experience, when tools are "regulated" to be safe, there is always a way to disable/overcome the built-in safety features. The current "SawStop" is an excellent case in point. It has a mechanism to allow the user to bypass the safety features to allow cutting of wet woods. There is no requirement to re-engage the safety features after the wet wood operations are finished effectively negating the "foolproof" safety features.

Secondly, it is a statistical fact that most accidents are caused by new users with less than one year of experience. No safety feature will overcome this fact. OSHA has shown this again and again since OSHA's creation.

The CPSC's own data shows that the relatively few accidents statically do not support the mandatory implementation of such legislation that is clearly aimed at and supported by teh maker of the only product on the market that meets the CPSC's own proposed requirements.

Further, the best indicator is the "real need" for such legislation is the insurance industry. In virtually every other instance in both industry and consumer products, mandatory changes to REAL unsafe equipment is instituted as a result of higher and higher insurance costs. Since insurance rates based upon proven actuarial data have clearly NOT driven the requirement for such mandatory safety equipment, I cannot support the CPSC's clearly political push for such requirements at the obvious behest of the Sawstop patent holders.

Lastly, if the Sawstop patent holder was true to his professed goal of making tablesaws safer for all users, he would release the sawstop mechanism into the public domain for voluntary use by concerned users. The government needs to stay out of my personal space. I STRONGLY am against any attempt by the CPSC to regulate safety by mandating the sawstop or any other such mechanism.

If the CPSC is truly concerned about tablesaw user safety they would regulate the cheap imported "portable" tablesaws (usually in teh sub $150 pricepoint) with flimsy and easily dislodged throat guards and other design flaws that make such saws inherently dangers by poor design that are not found in higher quality higher priced tools that are the real target of teh sawstop patent holders pushing for this legislation.
In short - stay out of my shop. I as the operator am the one responsible for my own safety and any attempt by the CPSC or other government agency to regulate my safety will just force me to seek out and covet the higher quality equipment built and made before such legislation was enacted.

JUST SAY NO TO YOUR ANPR on this issue!!!!

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, creating a monopoly and undermine the development of new table saw safety technology. The "sawstop" falls short of being the ultimate protection. We need options for better blade gaurds (that would protect from objects flying from the blade, and kick-back protection). Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Basically, if the CPSC could set aside the SawStop patents so that they don't end up with a monopoly that would hold a gun to the head of the power tool industry, I'd be less likely to oppose this.

However, I've seen this happen before in the sheet metal industry and it resulted in stifling the industry until the patents ran out, then newer technology began to flourish.

In that case, it took 20 years before newer technology was free to market better and more cost effective cutting systems.

This has less to do with safety than it does with corporate control of a segment of the power tool industry, since that's the case, I firmly oppose the ANPR to require "a system to reduce or prevent injuries from contact with the blade of a table saw."

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As a long time hobby woodworker, I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. While this technology has been shown in the past to lessen flesh contact injuries, there are still many injuries that this technology does nothing to prevent or lessen. Mandating this technology would give the careless user a false sense of security that is not there for this type of user with ANY technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

Creating a monopolistic situation for one manufacturer/patent holder is not the answer. Let the free enterprise system in this country find the answer through self determination and ingenuity. Do not force a one size fits all mentality on the manufacturers, because we all know that one mandated technology will stifle creativity in the R & D for better systems.
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Table saw's are inherently dangerous and should require a certification much like a drivers license. Every day people go out and buy motorcycles and crash them but they are not mandated to put throttle control, training wheels or a crash bubble on the motorcycle. You cannot fix stupid by regulation or mandating accessories. I encourage you to think twice before you let the lawyers/lobbyist institute a monopoly, I'm all for safety, not for lining the pockets of a single entity. Millions of people use a table saw every day and do not get hurt.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. While safety is important, there are certain operations that require safeties to be removed. In trim carpentry and furniture making a table is used for more than just ripping boards. There are dado and molding heads that are impossible to use with the safeties in place. Staircase construction and many furniture joints require plunge cuts that can't happen with this technology in place. There are other pieces of equipment that can be used to do some of these jobs, not all, but requires investment in additional pieces of equipment. A table saw is the single most versatile piece of equipment in a shop and this additional device will make it a single purpose piece of equipment. That single job can be accomplished by other means which eliminate it's widespread use.

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I oppose any federal ruling mandating the Saw-stop technology on all table saws. There are many stories among woodworkers of spontaneous activations of the Saw-stop system that cost the woodworker a new cartridge and blade. I support new technology that will make circular saws safer, but by mandating the Saw-stop technology, you remove any incentive for entrepreneurs to develop alternatives to the Saw-stop system.

This whole proposal is such an obvious attempt by one man to become wealthy, it is hard to imagine government is even considering promoting his greed.

I am a lifelong Democrat who has had enough of this kind of crippling government regulation.
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw."

Any technology "that cuts wood" that either spins or rotates a cutting edge that is driven or powered by a typical electric motor, carries with it a nature of a potential for injury if:

1. Not used in compliance with use, viz. setting proper blade height, locked table fence, riving knife/splitter; or out-feed tables for long stock;
2. Individuals don't have the proper training/education in the table saw's use;
3. Individuals do not follow directives as required in the use of the saw from the manufacturer and/or job site superior;
4. The user is incapacitated in some way and cannot follow safety directives.

While the "Saw Stop" technology is an incredible technology preventing injury if a hand or finger contacts the blade--it in now way prevent the four points I noted above. No regulatory activity or law, for that matter, prevents "stupid acts", if you will.

Table saws have been in use for quite some time, as have band saws, jointers, drill presses, sanders and planers; all have spinning cutters or sandpaper and all are, because of their very nature, require all users to be focused on the matters being accomplished at these types of machinery. I'm reminded of seatbelt legislation--safety in what each individual does is...an individual choice.

The very nature of the case that precipitated this regulatory proposal was based upon the saw operator's negligence in the saw's use. And as with all things of a mechanical nature, the tool is to be set up properly and maintained so as to function within its specifications. Again, the "responsibility" lies with the end user.

Before promulgating this regulation, I urge you to engage woodworkers, the companies that manufacture power tools for woodworking, and anyone with a vested interest such as those journals and magazines that review and test tools and their tooling.

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I oppose the mandatory rule for table saws that is being currently considered. As crafted, the rule would make mandatory the use of a single technology, potentially creating a monopoly and undermining the development of new table saw safety technology. Instead, of mandating this single technology for table saws, the CPSC should, in collaboration with the power tool industry and others in the table saw community, develop a number of solutions tailored to meet the needs of users and the range of table saw products. As an active user of table saws, I understand the need for safety. However, I'm concerned that CPSC is being lead to promote a single technology rather than establishing performance standards.

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If the SawStop CPSC petition were granted, it could be tantamount to the elimination from the market of portable bench top saws as we know them today due to the cost of compliance. The increased cost of even the least expensive table saws would result in power tool users resorting to unsafe methods to accomplish cuts normally performed on a table saw.

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.  

A woodworker such as myself (for over 40 years) can work safely and reduce the chance of an accident to near zero by using existing tools, equipment and safe practices. On the other hand, government mandated equipment such as the one proposed here, will never protect an untrained, thoughtless operator.  

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The CPSC should mandate proper use and education of a tool before it imposes a potential monopoly for SawStop and Steven Gass. I have used a table saw for many years and have had only ONE minor accident which was caused by MY OWN lack of safe usage. Luckily I was unharmed and had something akin to SawStop been installed on the saw I was using, it would have done NOTHING to protect me.

Accidents happen. Only with the knowledge of how to prevent them can they truly be prevented. Holding our hands will only produce sloppier craftsmen.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the proposed mandatory table saw safety technology now being considered by CPSC.

Table saws have recently incorporated improved safety features that have yet to be fully evaluated by CPSC. Until much greater statistical evidence is gathered, alternative, and very costly, safety measures should not be pursued.

The safety of table saws relies on a multitude of features. It is probable that imposition of a costly new technology will be fully or partially offset by cost cutting in other table saw safety aspects. These include splitter quality, safety switch design and convenience, size of table, quality of saw table fence, and the investment made in clear and concise safety instructions. It is conceivable that the net impact will be to reduce overall safety.

Making new saws more costly can extend the time during which older saws which lack today's safety features, remain in use. The overall impact may be a decline of safety, long term.

Please focus on alternative economic modeling to assess the problems and threats of this proposed change.
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

We don't need the government to mandate anything. Everything they have their hand in now is screwed up. Enough is ENOUGH.
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Additionally, if consumers do not use the provided safety equipment already on their saws, the data showing injuries is flawed in that it includes accidents that would have been prevented had common sense and the existing safety equipment been used.

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Address 2:  
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E-mail: beumer@juno.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Thomas Jeanne
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I strongly oppose any legislation that would require the use of specific patented technology to protect users from certain types of injuries. Appropriate training and utilizing Personal Protective Equipment is more than adequate to reduce injuries. Generic proximity detection devices can be used to ensure that only users who have completed training (carrying a card with RFID chip) and are wearing proper PPE (containing RFID chips) are able to operate the power tool.
I am not only a DIYer who owns and uses three different table saws, I was formerly the production director for a theatrical company whose design and build shop had at least six different table saws. I have significant experience with these types of power tools. I have seen more injuries due to ejected material than from contact with the blade. I have a very old table saw with no safety technology, and I feel as safe using that as with my newest saw. Table saws have advanced a great deal in 40 years, and if given the opportunity to be innovative, manufacturers will use many methods to make a saw safer.

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
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"I oppose the mandatory rule for table saws. Using the saw stop technology could create a monopoly and discourage any future development of future safety measures. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users."

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
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Every time I buy a new power tool I start removing most (if not all) the "safety features" that only provide a false sense of security while actually just being cumbersome attachments. Have been using power tools of every kind for over 45 years, still have all my body parts attached in their original locations.

I agree that there is a special kind of user that needs to be protected from his own carelessness and disregard of common sense, but people dies every day. Just like that.

If this piece of ..... "legislation" (to call it in some printable way) ever makes it s way to actually being enforced and if I need a saw, I will just make my own. Did that before already. NO WAY I AM GOING TO BUY YOURS!.

Preach common sense instead of greed!. And go find a real job!.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw."

We need to create jobs not eliminate them. If I cannot buy an expensive table saw, I will not be able to turn out useful products. I would be out of work.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. I also object to government regulations for safety that make a tool safe for right handed people and more awkward and less safe for left handed people

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I am a hobby woodworker with an ancient Sears table saw and all my fingers. I may replace it with a new one with current safety features but not if it includes complicated, unnecessary and costly features being considered by the CPSC. I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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The comments below reflect exactly how I feel about the proposed mandatory rule for table saws. We have too much regulation in our lives already. "I oppose the mandatory rule for table saws. Those at SawStop seek to mandate the use of a single technology, potentially creating a monopoly and undermining the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users."

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Name: George McCool
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. I have been using table saws for 30+ years and seen the improvements. Making this proposal unnecessary and probably creating a monopoly.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR as a system to reduce or prevent injuries from contact with the blade of a table saw. Mandating the ANPR system would restrict the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. When current safety guards are used as intended, accidents are reduced to near zero.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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As a carpenter and woodworker, I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, I hope the CPSC will work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working very well, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." In my 35 years of experience as a woodworker and mechanic, I have never been injured while using a piece of equipment that has factory guards and safety devices installed and operational. My belief is that the biggest majority of injuries are caused by non-functional, modified or removed safety guards. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw."

Tables saws today are already costly and heavy. Anything that would add to the cost or detract from the portability of the saw would be negative. Safety is a critical aspect of using power tools, especially table saws and reasonable precautions need to be taken by the operator. Any type of power saw carries certain inherent risks. Allowing the power tool industry to develop new safety technology and allowing consumers to choose the right option for themselves would be the best choice. Mandating a particular design is a bad policy and will stifle innovation.

The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. Since 4 Qtr 2007 there has been only one reported incident of a blade contact, as stated above the current standards must be working.

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I oppose the mandatory rule for table saws. Those at SawStop seek to mandate the use of a single technology, potentially creating a monopoly and undermining the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users.

Many accidents occur when existing safety mechanisms have been removed or disabled and this may add to that problem.

In addition, I have a concern that the substantial increase in price for these saws will cause casual users to shy away from them and cause them to try unsafe alternatives using tools not designed for the purpose.

--------
I oppose the mandatory rule for table saws. Those at SawStop seek to mandate the use of a single technology, potentially creating a monopoly and undermining the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users.

Many accidents occur when existing safety mechanisms have been removed or disabled and this may add to that problem.

In addition, I have a concern that the substantial increase in price for these saws will cause casual users to shy away from them and cause them to try unsafe alternatives using tools not designed for the purpose.

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I oppose CPSC mandating specific technology and would like to urge them to defer to the voluntary standard process. Why waste time, money and manpower pushing through a product FEATURE? This seems to be a decision that will oppress the market and cause other quality products to go up in cost, unnecessarily. Safety is a good thing, but so is marketplace competition. Let the manufacturers decide what safety systems they want to implement and then it will be up to consumers to choose for themselves based upon price, features, and quality.

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Name: Paul Johnson  
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I am opposed to the ANPR requiring a "system to reduce or prevent injuries from contact with the blade of a table saw."

The petitioner has worded their petition in such a way that should the petition be adopted, it requires the use of technology that the petitioner holds a patent to. This is nothing short of a monopoly, and one that would be sanctioned by the CPSC.

By allowing this action the CPSC would be discouraging others from developing new safety features or technology that could be as good as or better than the petitioner's technology.

ANSI/UL 987 has drastically improved the safety of table saws. The devices in use as a result of the standard not only address flesh contact with the blade, but other hazards such as kick-back and material thrown by the blade.

The technology the petitioner is requesting become the standard would seriously hamper the user friendliness of portable table saw units. It would make them so outrageously priced and un-user-friendly that it would create a hazard. People would improperly use other saws to do work best suited for a table saw because they could not afford one.

I have worked in public safety for 17 years as a firefighter, 10 as a 911 dispatcher, and 1 as an emergency medical technician and the first thing I have learned is that there is no cure for people's stupidity. You can put all kinds of safety devices in place and they will learn to defeat every one of them. They will learn how to defeat the petitioner's technology especially once they find out how expensive it is to return the saw back to working condition once the saw has activated.

The adoption of this decision will only help the current economic downward spiral this country is in as decent, hard working Americans will not be able to afford the tools necessary to keep themselves working in the trades. The only way America is going to pull itself out of this spiral is if Americans get back to work and start building the infrastructure America needs to ensure its own survival.

This ANPR is nothing short of governmental intrusion in to people's lives. What is more disheartening about it is there are safety standards already in place that are working. This is nothing short of someone trying to get rich in the name of safety; nothing short of scare tactics and fearmongering.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Kirk Simmet
State: PA
City: Media
Address: 46 Rampart East
Address 2:
ZIP: 19063
E-mail: simmetk@juno.net

I oppose the mandatory rule for table saws. Those at SawStop seek to mandate the use of a single technology, potentially creating a monopoly and undermining the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users. The industry has made great strides in attempting to counter the stupidity of the consumer with regards to power tool safety.

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Name: Frank Lawton
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City: coram
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Address 2: 
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E-mail: kmc164@msn.com

i want the govt to stay away from this intrusion. power tool usage is a matter of personal responsibility.

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C'mon folks.

Don't you think that by SawShop holding the patent for their own device would be enough? The revenue from sales and other legitimate dealings should be enough for them. Do not allow them to create a monopoly in this, or any other, area. I believe the safety standards put forth by ANSI/UL 987 are a very high standard to begin with. Please don't allow them to influence or change this in order to only benefit themselves.

By creating this monopoly it could very well lessen the fact that a young person will be able to afford a decent saw to explore and learn woodworking. Current high safety standards do not significantly add to the overall cost of a good basic saw of any type. I do not hesitate to purchase any electrical equipment because I am aware of the safety standards that have been imposed and are there for my benefit.

Whereas safety can be mandated, common sense cannot.

We already have a good safety council mandating for us and keeping us all safe. Don't let your common sense be overruled.

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I've never written before. However, upon learning about this proposed legislation/regulation, I felt obligated to act. Anything we do in life has the potential to be injurious to us. This starts from the time we get out of bed until we go to bed. What needs to be considered is the cost benefit ratio. How many reported accidents have there been? Is the proposed action needed to protect innocent individuals such as children? I could go on. From what I can ascertain, this is being proposed not to protect but to provide a single source of contract (monopoly).

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology.

If SawStop is so concerned about safety so as to petition your agency for this monopolistic standard, why not have them license their technology for free or at a nominal cost; that would show their true dedication to safety, not monopolization.

---------
Name: Mark Klaus
State: OH
City: Spencerville
Address: 12549 W. Union Rd
Address 2:
ZIP: 45887
E-mail: sualk@watchtv.net

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Harold Lohan  
State: MI  
City: Chesterfield  
Address: 31202 Broderick Dr  
Address 2:  
ZIP: 48051  
E-mail: lohan.harold@att.net  

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Jerri Rogers
State: OH
City: Beavercreek
Address: 2356 Old Post Rd
Address 2: 
ZIP: 45434
E-mail: jerri@rogersrus.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Kevin Johnson
State: IL
City: Naplate
Address: pobox2161
Address 2:
ZIP: 61350
E-mail: kevin.h.johnson1@us.army.mil

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Tom Wildman
State: MA
City: Bolton
Address: 542 Sugar Road
Address 2: 
ZIP: 01740
E-mail: cpsc@sugarmeadowfarm.com
I oppose passing of the proposed rule mandating a monopoly for a saw safety issue that would have addressed only one incident in the last 4 years. The flesh detector technology is good and I personally may not have been short two fingers had my radial arm saw had it back 30 years ago. None-the-less, regulations by you giving this one company a mandate to make money off every saw built is wrong. First, force the monopoly to go away and then let market forces prove the worth of the add-on (which IMHO is way too expensive).
Name: Albert Davis
State: IL
City: Elmhurst
Address: 325 E Laurel Ave
Address 2: 
ZIP: 60126
E-mail: davis_ar@comcast.net

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The cost/benefit ratio of the proposed standard is unjustifiable, the absolute number of injuries which would be avoided by this very expensive regulation in infinitesimally small, the business ramifications of the law as proposed are anticompetitive, and the intrusiveness of the regulation into the industry overall, as well as the livelihoods and hobbies of many thousands of Americans, will be resented and corrosive.

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NB I think SawStop is excellent technology however I do not feel it should be a mandated technology.
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
Name: James Christopher  
State: NC  
City: Salisbury  
Address: 1085 Raven Brook Way  
Address 2:  
ZIP: 28146  
E-mail: jameschristopher92@yahoo.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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If the SawStop CPSC petition were granted, it could be tantamount to the elimination from the market of portable bench top saws as we know them today due to the cost of compliance. The increased cost of even the least expensive table saws would result in power tool users resorting to unsafe methods to accomplish cuts normally performed on a table saw.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

--------
Name: Karl Ishmael
State: NY
City: Grand Island
Address: 1229 Ransom Road
Address 2:
ZIP: 14072
E-mail: shelbystar1@hotmail.com

I've been using table saws for 25+ years and have yet to have any issues with current safety devices. Therefore, I agree with the position of the PTI. Thank you, Karl.....

"I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety".

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Name: Karl Ishmael
State: NY
City: Grand Island
Address: 1229 Ransom Road
Address 2: 
ZIP: 14072
E-mail: shelbystar1@hotmail.com

I've been using table saws for 25+ years and have yet to have any issues with current safety devices. Therefore, I agree with the position of the PTI. Thank you, Karl.....

--------
Name: Jason Brown
State: CA
City: Oakdale
Address: 1855 Churchill Downs Circle
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ZIP: 95361
E-mail: browniejr@mac.com

As a System Safety/ Product Safety Engineer with over 25 years of experience evaluating designs for Safety Issues, I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly. This is the exact wrong approach to foster industrial creativity and instead will undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. The market is ALWAYS a better judge of what works than regulations, and there is a need for additional innovation in this area. Locking in a single methodology will disrupt this process and ultimately prevent better solutions, thereby degrading personnel safety in the long run.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. I have used a 1970's version table saw for years - and see no need to have the government mandate more regulations which would serve to create a monopoly position for a single company. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Charles Gilley  
State: GA  
City: Cumming  
Address: 2640 Cambridge Hills Rd.  
Address 2:  
ZIP: 30041  
E-mail: cgilley@bravesw.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The proposal under consideration is no less than crony capitalism with someone trying to use the regulatory process for personal gain.

Let the market and common sense of power tool users allow the appropriate market place choices.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

People need to be responsible for their safety - not make me pay for their ignorance.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology and undermine the development of new table saw safety technology. The proposed technological solution would likely result in the user disabling all of its functions resulting in an INCREASE in injuries.

Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Al Bauer
State: NM
City: Williamsburg
Address: HC 31 Box 206
Address 2: 
ZIP: 87942
E-mail: 1albauer@gmail.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Glenn Alexander  
State: NY  
City: New York  
Address: 100 Mitchell Pl  
Address 2:  
ZIP: 10017  
E-mail: glenn3alexander@netscape.net

I support the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of safe and reliable technology, potentially saving lives.

I strongly support imposing a safe technology so that table saw manufacturers must provide adequate safety to all users. I strongly suggest that the CPSC stop resisting safety measures and submit to the act. In addition, instead of dodging their responsibilities they should work with the power tool industry and others in the table saw community to ensure tablesaws are as safe as possible. This is not done today. The standard, ANSI/UL 987, is not working as evidence of the thousands of people injured each year by their "safe" equipment.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: James Capozzi
State: NY
City: Fulton
Address: 13ellen st.
Address 2: 
ZIP: 13069
E-mail: Grizzz66@hotmail.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Years ago I first learned of the Saw Stop innovation and thought it was a remarkable piece of engineering. However, mandating a substantial cost to table saws to make them safer is not the most sensible answer in these difficult fiscal times, especially since accidents are gratefully rare. It could cause some manufacturers to go out of business because of greatly increased costs. Sure, accidents happen, but most of the time it is due to operator error. As ANSI/UL 987 is working, why fix it? It is a proven fact that extensive safety innovation in automobiles often cause drivers to be reckless thinking they are 'safe' no matter what they do. I am all for enhanced safety, but let that begin with better education of and understanding how to use any power tool. The best protection is prevention, not band-aids that unintentionally promote carelessness and especially if they are cost prohibitive or monopolistic no matter how effective. I think if the cost of table saws greatly increased, so would liability and health insurance as well as the cost of providing professional services to the cash-strapped public. Maybe what we need are rubber saw blades!

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Name: Scott McPherson
State: TX
City: Richardson
Address: 235 High Brook Dr.
Address 2:
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E-mail: scott@renremod.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." I'm sick of paying for regulations for idiots. Idiots don't read the manual. Idiots don't follow rules. Idiots take safety guards off tools. Idiots get hurt. I have never heard of anyone getting hurt using a tool properly. I have, however heard of lots of people getting hurt using tools improperly. Another regulation is not going to cure stupid. ANPR will create another layer of governmental BS that most Americans are fed up with. You work for the taxpayer so do us all a favor and don't push through this legislation for idiots. The last thing our industry needs is higher costs/prices.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

I would agree with it if it were voluntary and if Mr. Gass took himself out of his conflict of interest situation by revoking all of his patents on this technology. To let a single person mandate that everyone who buys a table saw must use his personal patented technology at the exclusion of all others is the height of absurdity.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw."

The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Spotswood Williams
State: VA
City: Flint Hill
Address: 2307 Jericho Road
Address 2: P.O. Box 598
ZIP: 22627
E-mail: spotswood47@earthlink.net

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The Saw Stop flesh sensing braking system is not an end all to safety concerns and creates a new sense of false security to the operator. They often remove the cumbersome blade guard and are then at risk of injury due to material kickback or ejection. Much has been achieved by manufacturers complying with UL 987 and injuries to operators complying with blade guard operation have significantly dropped to only one reported saw blade contact accident since 2007. The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Rick Williamson  
State: KY  
City: Louisville  
Address: 10916 Pineview Ct  
Address 2:  
ZIP: 40299  
E-mail: rcowilliamsonjr@yahoo.com

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Name: Lawrence Juvrud
State: SC
City: Salem
Address: 7 Slack Tide Ct
Address 2: 
ZIP: 29676
E-mail: ljuvrud@charter.net

Please do not impose yet another government required safety system on me. I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Isaiah Lawrence  
State: RI  
City: Bristol  
Address: 26 Center St.  
Address 2:  
ZIP: 020809  
E-mail: maddzeke@yahoo.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Clay McDowell  
State: MD  
City: Rising Sun  
Address: 328 Smith Rd.  
Address 2:  
ZIP: 21911  
E-mail: cncme@zoominternet.net

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw."

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Name: Chris Serrano
State: TX
City: Sinton
Address: 332 S Chiltipin St
Address 2: 
ZIP: 78387
E-mail: cxserrano@gmail.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
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Name: Robert Keller  
State: NJ  
City: Parsippany  
Address: 430 Allentown Road  
Address 2:  
ZIP: 07054  
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.  
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Name: Raymond Sheehan  
State: NY  
City: Sloatsburg  
Address: 19 Richard St  
Address 2:  
ZIP: 10974  
E-mail: rjmcnsty@optonline.net

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Name: Friedolin Hauk
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City: Saginaw
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Address 2:
ZIP: 48601
E-mail: friedolinhauk@aol.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Robert Davis
State: CA
City: Fullerton
Address: 1019 N. Highland Ave.
Address 2:
ZIP: 92835
E-mail: rmd11toni@aim.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Steve Schaefer
State: OH
City: Cincinnati
Address: 8549 Wuest Road
Address 2:
ZIP: 45251
E-mail: steves@fuse.net

30 years ago I built my own home. The availability of a good $250 table saw was critical to being able to construct my home and is needed for many other home and community service projects.

I do not see the need for a mandatory technology system to reduce or prevent injuries from contact with the blade of a table saw especially when this potential monopoly would greatly increase the cost of table saws. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Janice DeLerno  
State: LA  
City: Baton Rouge  
Address: 8860 Highland Road  
Address 2:  
ZIP: 70808  
E-mail: janice@thestockade.com  

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." I reserve the right to use the tools at my own discretion as needed. I oppose a single monopoly style fix which forces me to pay more for equipment. CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process.  
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a SINGLE technology, potentially creating a MONOPOLY and undermine the development of new table saw safety technology. Instead of imposing a SINGLE technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, ALREADY is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Loren Sherman  
State: NY  
City: New York  
Address: 685 West End Avenue, #1B  
Address 2:  
ZIP: 10025  
E-mail: ls@inovallc.com  

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.  
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I oppose the proposal that forcibly requires manufacturers to include a protective device on table saws to prevent contact of flesh with the blade. I oppose this for the following reasons:

1. The cost burden placed on saw manufacturers will be passed on to consumers. This would hurt the industry and the consumer.
2. This ruling stands to make a single company sole owner of a market (monopoly). Have we learned nothing from the telco and computer monopolies of the 80's and 90's?
3. The consumer should have the right to choose, as they do now. It is a waste of taxpayer money to make additional rules/laws on such issues.

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Name: Michael Ford
State: FL
City: Melbourne
Address: 886 Creel
Address 2: 
ZIP: 32935
E-mail: mdf885@netzero.net

The number of accidents per year involving table saws do not warrant a government mandated change. Mr. Grass is not concerned with improving the safety of a table saw. His main goal is to make a profit. If Mr. Grass were to open the patent to allow any manufacture to use the Saw Stop design without cost then we can assume safety is behind his push for the Saw Stop to become the standard.

Using a table saw does have risk. Common sense and safe operating procedures are all that required. Crossing the street also has some risk. Are we going to require every city in the county to remove crosswalks and put a bridge over every intersection to remove the risk?

--------
Name: John Heizer  
State: TX  
City: Beeville  
Address: 804 Newhall  
Address 2:  
ZIP: 78102  
E-mail: jheizer@stx.rr.com

I am against the mandatory rule for table saws. For one person to be able to make a change to a tool industry wide and have a monopoly on it is not the American way. This new law is not needed. The injury rate on table saws is at an all-time low. All this new law would do is increase the cost of the saw and not really accomplish much. Please take into account how this change will affect the cost to the public who will be buying this saw in the future.

--------
Name: Theodore Williams  
State: KY  
City: Louisville  
Address: 9104 Spokane Way  
Address 2:  
ZIP: 40241  
E-mail: ted-williams@insightbb.com  

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
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Name: Frank Moon
State: MN
City: Hayfield
Address: PO Box 306
Address 2: 14 1st St SE
ZIP: 55940
E-mail: frankbettymoon@gmail.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw."

Please consider that if the patent web of SawStop cannot be avoided, CPSC would in effect be imposing a design standard, rather than a performance standard (as applicable federal law requires).
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Name: Brian Crosley  
State: WA  
City: Kennewick  
Address: 200802 e Game Farm rd.  
Address 2:  
ZIP: 99337  
E-mail: Bkcross@gmail.com

"I oppose the mandatory rule for table saws. Those at SawStop seek to mandate the use of a single technology, potentially creating a monopoly and undermining the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users." safety.

--------
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: David Kaylor
State: VA
City: Petersburg
Address: 4011 Dupuy Rd.
Address 2: 
ZIP: 23803
E-mail: daklefty@hotmail.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I have been wood working since the age of 12 (about 45+ yrs now) and have never, ever had an accident with a table/bench saw, and the majority of that was prior to the PTI Safety Designs implemented in the Fall of 2007. (Stds: ANSI/UL 987) The floating safety shield and riving knife commonly used by manufacturers today works extremely well; however, it is NOT "Idiot Proof" and no design is, nor will ever be!!!

I hold a Master's Degree in Electrical and Mechanical Engineering and have been a R&D/Design Engineer for 27+ yrs, primarily in the medical field, designing surgical drills, surgical tools, and implants.

I have provided the field research/data for hundreds of patent applications both in and out of the medical field. And there is NO WAY that a capacitive-inductance sensor system on a table/bench saw warrants 70 patents of any type, much less adding an additional 120 conjunctive patents. All Stephen Gass is trying to do with his SawStop device is "corner the market" and convince you, the CPSC, to grant him an exclusive "golden goose" monopoly, thereby making him richer than he already is!!!

All the reputable manufacturers have and are continually working with PTI to improve the safety of their products. NO reputable manufacturer wants their products to be the source of a major injury, lawsuit, or headline news!!!!

I have used many brands of table/bench saws over the years, e.g. Craftsman, Emerson, Porter Cable, DeWalt, etc. I presently use a Pro Grade portable 10" table/bench saw by DeWalt (2008 year model). It has the floating guard and riving knife and it works very, very well. And on occasion, I have removed the safety guard for particular type cuts; but then, as always, I use "push sticks" and feather boards, or when those aren't feasible, I have an assistant holding/guiding the material.

My DeWalt saw cost approximately $480; not cheap, but not the most expensive that DeWalt builds. I would not have been happy if the price of this saw had been inflated by an extra $150 - $200 because DeWalt was forced to build in a safety feature that was neither needed, warranted, nor beneficial. Should the CPSC implement the "Active Flesh Detection" requirement, I can assure you that I will rebuild my DeWalt saw continually in the future (I have the tools and skills to do so easily.) rather than purchase a new saw that's overpriced to incorporate a needless safety feature.
NO table/bench saw can be made "Idiot Proof", nor miter saw, drill, router, sander, planer, etc. If people are careless, they will get injured!!!

If Stephen Gass is so confident about the great, inherent safety of SawStop, maybe he should do a demo with his own finger, rather than a hotdog!!!!!

I would hope that the CPSC is forward thinking and intelligent enough not to grant a monopolistic golden goose regulation to Stephen Gass. If you do, it will be to the detriment of wood working consumers........and would be no different than the NHTSA issuing a regulation requiring all cars built and sold in the U.S. to use a "safety lock-out" feature for automatic transmissions preventing a driver from "accidentally" shifting the car to "Reverse" while travelling on the express way at 65 mph, and this "safety lock-out" device was built by General Motors!!!!! Would Ford, Chrysler, Audi, Mercedes Benz, BMW, Toyota, Nissan, Mazda, etc. be upset? Absolutely. General Motors would have a "golden goose monopoly". And more importantly, consumers would be livid because their new car would cost an additional $200 - $500 for a device they didn't need, nor want, because they had NEVER shifted their transmissions to "Reverse" while driving along the express way........but some idiot might........so the NHTSA would need to protect those idiots!!!!!!!!
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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This is an example of the fallacy of safety at all costs! This is far too burdensome for the public. I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology not to mention making 1 company rich! Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

The one thing that standards cannot fix is personal experience and responsibility of the tool user. There will always be a risk involved if a user is not experienced or is distracted while using a table saw. If a user of a table saw wants the "saw stop technology or another technology " let them purchase it through the manufacturer of the saw. Just the same as if a person wants their car to stop faster they buys one that has 4 wheel disc brakes as an option, not eveyrone has the need for 4 wheel disc brakes!
Name: George Keiser
State: NY
City: Binghamton
Address: 14 Beechknoll Rd.
Address 2: 
ZIP: 13903
E-mail: upslpn@yahoo.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Steve Bayless  
State: CA  
City: alta loma  
Address: 6608 halstead ave  
Address 2:  
ZIP: 91737  
E-mail: slbayless@hotmail.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR is totally unnecessary, an overregulation with no measurable benefit, and windfall profit for the designer because of the monopoly it allows.

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Name: Raymond Shields  
State: WA  
City: Bellingham  
Address: 824 Racine St  
Address 2:  
ZIP: 98229  
E-mail: rayshields@msn.com  

I wish to let you know that I strongly against the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." In particular, I oppose mandating the use of a single technology (i.e., SawStop). I have nothing against the SawStop technology per se, and in fact I find it a clever idea, but having just purchased a new Delta Unisaw within the past year, it is apparent to me that there have already been significant improvements in table saw safety that don't necessarily involve a flesh sensing mechanism. I feel entirely comfortable with the saw as it is, and feel it is unwise and unfair to mandate a single technology when a number of others may suffice. I am also a firm believer in individual freedom AND responsibility. Many of the current table saws, when used in accordance with their instructions (or at least in accordance with some modicum of common sense) are remarkably safe. CPSC should work with the power tool industry in promoting reasonable standards such as ANSI/UL 987.
Name: David Noble
State: VA
City: Bridgewater
Address: 131 Cindie Lane
Address 2: 
ZIP: 22812
E-mail: davidnbl@comcast.net

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Thomas Smith
State: NY
City: Bronx
Address: 80 Bay Street
Address 2:
ZIP: 10464
E-mail: tom_smith@mac.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw."

It is unconscionable that a private firm would be granted the unilateral ability to benefit from the coercive powers of an unelected bureaucracy. To force American citizens to line the pockets of a private corporation is despicable. It is precisely this sort of arrogance that has spurred the Occupy Wall Street mobs. Shame on you unelected bureaucrats.

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Name: Richard Tharp  
State: TN  
City: Chattanooga  
Address: 315 Guild Dr  
Address 2:  
ZIP: 37421  
E-mail: LynnTharp@gmail.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

What will we regulate next... pocket knives with permanent flexible guards so we won't cut ourselves???

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I oppose the government mandating the use of a single technology, namely SawStop, that would create a monopoly for a self-serving attorney to benefit from a patent he owns. Instead of imposing a single technology that may not be appropriate for all table saws, the CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process, that also creates competition in the marketplace, which keeps consumer costs down. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Jon Kuehl  
State: TX  
City: Hawkins  
Address: 1326 Private Rd. 7905  
Address 2:  
ZIP: 75765  
E-mail: jkuehl42@yahoo.com

I oppose the mandatory rule for table saws. Those at SawStop seek to mandate the use of a single technology, potentially creating a monopoly and undermining the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users.  
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Name: John Kokesh
State: MN
City: Minnetonka
Address: 15203 skycview Dr
Address 2: 
ZIP: 55345
E-mail: jlkokesh123@comcast.net

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I oppose the proposed rule that would outlaw the sale of all table saws that do not contain the new technology that automatically stops a saw blade from spinning whenever the blade contacts skin. This new technology and its benefits is well known to all table saw users. The user can decide for himself whether he wants to spend the extra money to buy a saw with the technology. Many users have decided to pay the extra money to buy the technology, but many others have not. It's not the business of government to mandate more safety that the individual wants to buy.

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Name: John Lary
State: AL
City: Huntsville
Address: 809 Jacqueline Dr. SE
Address 2:
ZIP: 35802
E-mail: johnlary@yahoo.com
Name: Jackie Huesing  
State: AZ  
City: Scottsdale  
Address: 11478 N. 87th Place  
Address 2:  
ZIP: 85260  
E-mail: jackiehues@cox.net

Please do not create "mandatory" rules where none are needed. The only "need" here is to Mr. Gass' lifestyle. Please consider the common man!

--------
Name: Nathan Wright  
State: OH  
City: Cincinnati  
Address: 4212 Red Bud Place  
Address 2:  
ZIP: 45229  
E-mail: nathan@viceregency.net

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw."

This Gass guy is full of hot air and he is wasting your time. Any machine needs adequate safety mechanisms, but no mechanism will prevent all accidents.

If you pass this, the cost of table saws will go up and less people will have quality tools. How many hands will be cut off by idiots who rigged up a "table saw" by bolting their skilsaw to the bottom of an old ping pong table?

Please don't approve this.

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Name: Glen Fisher  
State: VA  
City: Falls Church  
Address: 2954 Rosemary Lane  
Address 2:  
ZIP: 22042  
E-mail: Gfish818@gmail.com  

This is nothing to do with safety and everything to do with trying to create a monopoly. Now if the coast to coast protest are not enough to remind you that America is fed up with self serving lobbyist tainting politics then a clean sweep of all incumbents will be.

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.  
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Name: Thomas Busler
State: MS
City: Hernando
Address: 5943 Slocum Trail
Address 2: 
ZIP: 38632
E-mail: tbusler@comcast.net

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. I have had a table saw, radial arm saw, circular saw, reciprocating saw, jig saw, chop saw, chain saw, and every other kind of tool known to man for many years. I still have all my fingers. These "safety devices" are not necessary for a person of normal intelligence. If a person is stupid, all the devices in the world will not save him from himself.
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Hank Burgos  
State: CA  
City: Rialto  
Address: 5818 magnolia ave  
Address 2:  
ZIP: 92377  
E-mail: hankabilly@gmail.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, likely creating a monopoly and undermining the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the requirement of sawstop technology on all saws. This will create an undue burden on my business, if you apply this logic to table saw will not all saws logically be required to have this added expense.

The bottom line is that the table saw is not excessively dangerous when fitted with the supplied guards. I would venture to guess that less than 1% of all ts injuries occur with the guard in place. It is the users responsibility to use the tool responsibly.

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I believe that mandating a system be used is overstepping the bounds of what the CPSC is meant to do. It in essence is taking away the necessity that people working around dangerous equipment treat such equipment as such. Additionally, the mandatory requirement will inevitably increase the cost of equipment placing an undue hardship on the workers and contractors. Furthermore, the laborers toting the saws around will have to transport a heavier saw. I have worked with the saw stop and seen many people treat a dangerous piece of equipment as a toy because they believe it cannot hurt them. I have seen workers see how close they can get their finger to the blade before it retracts. Ultimately, the best course of action to protect workers is proper training and enforcement of safety topics. The answer is not to create a monopoly for Saw Stop, but to remind everyone of the dangers of these tools we use everyday. Besides, what's next, mandating a hammer that won't let you hit your thumb?

Finally, I agree with the following statements made by the Power Tool Institute.

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Eric Hubbard
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ZIP: 45011
E-mail: elh@fuse.net

I oppose the mandatory rule for table saws. Those at SawStop seek to mandate the use of a single technology, potentially creating a monopoly and undermining the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users.

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Name: David Joe  
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.  
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I'm sure the CPSC's motives are noble. Of course everyone would love for there to be no table saw injuries. But I suspect in the process of trying to protect everyone from every increasingly smaller and smaller manageable risks, the CPSC is forgetting two things:

1) Enacting this mandatory standard will increase the cost of all table saws, thus forcing low-income consumers to defer replacing older table saws that are likely less safe than current models, or possibly use another cutting tool that is not appropriate for the job.

2) Risk homeostasis. The universal human behavior to take riskier actions when previous risks have been removed. E.g., drivers with seat belts feel safer and thus drive faster. I have no doubt that many users of table saws with the amazing SawStop technology will feel the urge to impress their friends by demonstrating their new saw's safety features. Next thing you know someone is shoving their finger in a little quickly for the mechanism, or the mechanism doesn't work (it can't be 100% effective), and you now have a NEW method of injury!

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Please do not inhibit consumers' abilities to purchase table saws by mandating this technology (which is already available for those who wish to utilize it) which will inevitably raise the cost of the equipment by hundreds of dollars. The increased cost will put these machines out of reach for many consumers, most of whom will be the non-professionals without the proper training and knowledge and will attempt unsafe ways around the too-expensive table saws.

Those at SawStop seek to mandate the use of a single technology, potentially creating a monopoly and undermining the development of new table saw safety technology.

In addition, the Flesh Sensing technology does nothing to prevent work material kickback or objects ejecting from the saw itself, unlike current safety measures and guards. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users.

---------
Name: Calvin Perilloux  
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Please consider my opposition to the misguided safety proposal "system to reduce or prevent injuries from contact with the blade of a table saw." Very seriously, the current safeguards work very, very well, and implementing this proposed new standard appears to be nothing more than a grant to a patent monopolist who wants to make money from a government mandate.

Implementing these expensive new measures will, in fact, have the adverse effect of raising prices and thus encouraging users to remain with older equipment. Please do NOT implement these radical -- and unnecessary -- safety measures.

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I've been around and working with all shop tools including Table and Radial Arm saws since 1959. In that time I have only experienced one single incident in which a worker was fairly seriously injured on a table saw. That unit was a 1960s model and being used without the old style guard in place.

Please take a trip down to any store selling table saws and see for yourself the greatly improved guards that allow good visibility, prevent kickbacks and flying debris, built in pushsticks, etc.

Kickback is the biggest concern I've had generally and no flesh sensing high cost, clumsy government required addition is going do an iota of prevention with that problem, which is nearly a thing of the past now anyway!!

Thanks for reading and PLEASE don't make this hobby (hobby now after years of working the business) more costly, less enjoyable.

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw. The CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process.

The standard, ANSI/UL 987, already is working just fine!

--------
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

As a consumer, I feel it is imperative for the industry to provide me with multiple safety approaches that I can evaluate and determine the system that works best for my woodworking environment, not have a single mandated approach that may not work for me and I would disable should I be able to afford it.
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw."

It is unfair and unwise to mandate, or potentially create a monopoly and deter new developments in tool safety technology.

I agree, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

The people do NOT want over-regulation. We reserve the right to decide for ourselves what to purchase, what to risk.

Encourage creative new technology and help keep price increases to a minimum from over-regulation and over-engineering. The added weight could cause other safety risks due to size and mobility for contractors hauling tools to job sites. Thank you for your consideration.

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Address 2:  
ZIP: 48307  
E-mail: k9sparks@sbcglobal.net

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process.

The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.  
IF SOMEONE WANTS TO BUY A SAW STOP VERSION OF A SAW LET THEM, DO NOT MAKE US PURCHASE THE SAW WHEN THE CURRENT SYSTEM IS WORKING. BY Changing the rules to saw stops versions it will cost homeowners more and contractors more to build items or remodel. THAT WILL BE A NEGATIVE IMPACT ON THE ECONOMY AND ALL THIS ONLY TO MAKE A COMPANY AND CEO RICHER. IT DOES NOT MAKE SENSE AND WILL NOT MAKE PEOPLE SAFER EITHER.

--------
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Address 2: 
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E-mail: amfastphoto@yahoo.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR appears to be motivated by the flow of money, not safety. The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I respectfully ask that the CPSC consider the following:
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I disagree with the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. Sometimes we can have more rules than common sense.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
I disagree with the proposal to make table saw blade safety mandatory. I've been using table saws for over 30 years and have never had an injury. I was properly trained on the use of table saws and don't see any need for more governmental restrictions and added costs to a table saw. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
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Here is another case of the Government interfering in private business decisions. More regulations only sap the entrepreneurial spirit from our country.

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The system you are considering is unlikely to remain functional in the types of conditions seen in the home construction industry. I can't afford to lose a day's pay because my saw won't cut damp wood or the electronics of this complex system have mis-fired and rendered my tool in-operable.

The nature of the home construction industry is having tools subjected to harsh conditions. I need my tools to function in order to make my living.

The manufacturers of "saw stop" have not put their product into saws used in the home construction industry because they know it would not hold up under those conditions and would also produce a product too expensive for the average carpenter to be able to afford.

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ZIP: 35216  
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and smacks of the lobbyist=government problems we have today, stop it!

Keep a free market - if someone wants more safety devices because they don't know how to use a table saw, then a company can, and already does, offer that product enhancement. You cannot legislate to eliminate dumb-asses, they will find their way around ANY system.

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Address 2:  
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E-mail: wardenpilot@yahoo.com  

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw."

The tool industries have done a good job producing tools that have user safety in mind. They don't need more government rules.

The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Douglas Vassello  
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Name: Hank Wolinski  
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Address 2:  
ZIP: 21219  
E-mail: familyguytoo@netzero.net

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Name: Dennis Slama
State: NE
City: Lincoln
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Address 2:
ZIP: 68512
E-mail: dennis@slamahomes.com

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I am a frequent table saw user and know of the dangers imposed by table saws. I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw."
The current voluntary standard, ANSI/UL 987, already is working (only one blade contact injury reported under the new standard), has demonstrated positive acceptance by table saw users, and is in the best interest of safety. On the other hand, the single technology proposed in the ANPR has, by its own inventor's data, shown that blade contact incidents are nearly five times more likely using their technology. In part, this may be due to decisions by users to disable blade guards based on a false sense of security promoted by the technology. I know this to be a fact based on the way that I and others have often used table saws.

While the proposed technology is awesome, it represents just one potential way of preventing injury. To mandate it as the sole method monopolizes an industry, negatively impacts consumers despite a decided lack of a positive benefit-cost ratio, and discourages future improvements to table saw safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.  
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The 30 year old Craftsman table saw I recently retired had precious little in the way of blade guards. We practiced shop safety every time we used it. The new BOSCH saw I bought as a replacement has blade guard design features unique to the manufacturer. I can't imagine why BOSCH or any other manufacturer should be compelled to compromise its design for a federally mandated feature designed by others!

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This technology should be an option for those who choose the system not forced on all users. Another choice could be an adaptation on the Home Depot system. Do not limit us to one choice.

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I oppose the mandatory rule for table saws. SawStop is trying to mandate the use of a single technology, which never makes sense. CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users.

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I have been an avid woodworking hobbyist for 20 years, and I have used table saws since I was 12 years old. Safety while using any woodworking equipment in my mind should be at the utmost importance to any user of woodworking equipment. However, further government regulation beyond the standards already established is a gross misuse of the power government has to implement controls and regulations on its people. I doubt very much if anyone in the USA would be surprised to find that utilizing a table saw is a potential safety hazard. And the lack of table saw incidents throughout the USA is further fact that people who use table saw understand the risks associated with them. Governments should only enforce regulation where the citizens could be harmed by something they believe should be inherently safe. For example, the lead paint found on children's toys a few years ago. The US government had every right to enforce regulations to protect its citizen when a safety risk is present for which no risk should exist in the first place.

Therefore, I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. If there is an overwhelming need to enforce further safety protocols on table saws, instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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E-mail: tabercrombie@bellsouth.net

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E-mail: gohsman@charter.net  

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.  

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I am writing to the Consumer Product Safety Commission to recommend against the issuance of a mandatory power saw safety design rule: a system to reduce or prevent injuries that result from coming into contact with the blade of a power saw.

Consumers have a variety of effective options in power saw safety features from which they can select. Allowing one technology to have a monopolistic influence over power saw safety is unfair and unnecessary. Other technologies will be developed that will probably prove to be more effective and less costly than the system currently under consideration. I am suggesting that the Consumer Product Safety Commission allow the marketplace and the individual consumer to determine which power saw safety system will be used.

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Although this new device which prevents any injury if one should put his fingers, hand or any other body part into a blade and the technology is impressive, I believe carpenters, cabinet makers and even hobbyists who use table saws practice normal table saw safety. Requiring every new table saw to have a system to reduce or prevent injuries from contact with the blade of a table saw is simply overregulation. ANPR will never be able to prevent all power tool injuries as long as there are people who use tools without knowledge or the currently available blade safety devices. It appears the ANPR wants to mandate the use of a single technology. Instead of imposing a technology for all table saws the consumer should be the decision maker for purchase of saws which use this new technology. The existing safety standards work well and I'm a firm believer in "if it ain't broke, don't fix it". Although this new technology is great, making it mandatory for all new table saws is ridiculous, will add significant cost to table saws, and is unnecessary for persons who already use good safety practices and employ the typical blade guard technologies.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." Table saws are dangerous, but no more dangerous than any other power tools out there. The government needs to allow people to take responsibility for their own actions, even if that includes wounding themselves for improper use of a power tool.

We don't need yet another safety measure on table saws mandated by the government. If a table saw manufacturer wants to incorporate additional measures, then that is fine and the marketplace can work it out. However, we should not be mandating additional rules over ANSI/UL 987, which is already in place. Please let the market work, and stop trying to protect us from ourselves.

--------
Name: Mark Atkinson  
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Address 2:  
ZIP: 46236  
E-mail: Mark.Atkinson@comcast.net

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Douglas Atkinson
State: VA
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We don't need yet another safety measure on table saws mandated by the government. If a table saw manufacturer wants to incorporate additional measures, then that is fine and the marketplace can work it out. However, we should not be mandating additional rules over ANSI/UL 987, which is already in place. Please let the market work, and stop trying to protect us from ourselves.

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I strongly suggest that the CPSC act in a manner that fosters the continued development of technologies to improve safety, rather than to arbitrarily decree one technology to be the only acceptable one for a tool's safety. Our culture of continued improvement and development ought to be preserved.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. Regulation can be a blessing or a bane. I can't comment on the motive of the person who is driving this legislation but believe this will add a lot of cost to the respective tools and actually serve to lull the users senses. This could lead to even more injuries when using similar tools without the safe guards. While the intent may be pure the law of unintended consequences needs to be taken into consideration before going forward with any kind of supportive enactments.
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." I think the CPSC should avoid mandating a safety requirement that can be satisfied only by a design subject to patent protection for many years to come. Surely a performance standard that does not require a specific design will accomplish the same without totally changing the market for and availability of table saws, especially to amateur woodworkers such as myself who could be unlikely to invest the large amount that would be required to buy a tool that is not part of my livelihood.  

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Name: Jason Channell  
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Address: 2804 Orchard Lake Road  
Address 2: Suite 201  
ZIP: 48320  
E-mail: jason@apscmi.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw."

The ANPR would mandate the use of a single technology. CPSC would in effect be imposing a design standard, rather than a performance standard (as applicable federal law requires), and this mandatory rule would create a monopolistic advantage in the marketplace.

A monopoly means two things: 1) automatically higher prices (and we contractors are hurting financially already), and 2) a lack of financial incentive to improve on safety devices... ultimately hurting the people this rule was supposed to protect.

According to the available statistics, since the 4th quarter of 2007 there has been only ONE reported incident of a table saw blade contact with the already existing improved saw blade guards. One incident!

Instead of imposing a single technology that may not be appropriate for all table saws, would increase prices, and would ultimately damage the incentive to continuously improve safety, I would ask the CPSC to work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process.

The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I'm against the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would enforce the use of one technology, probably creating a monopoly and therefore kill any incentive toward the development of new table saw safety. Instead of imposing a single device that may not be appropriate for all table saws, I think CPSC should get in meetings with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, shows positive acceptance by table saw users, and is really the best way to insure safety. It's nonsense to let this ANPR go through since it essentially allows one patent-holder to profit. That makes it look like CPSC is the pawn of business interests. That could be some pretty bad press in a time like now with the Occupy Movement going on. I know CPSC will do the right thing regardless.

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"I oppose the mandatory rule for table saws. Those at SawStop seek to mandate the use of a single technology, potentially creating a MONOPOLY and undermining the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users."

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Name: Jeremy Eschmann
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ZIP: 63128
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I OPPOSE the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a MONOPOLY and UNDERMINE the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Robert Gannon  
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I oppose the mandatory rule for table saws and the ANPR’s push for "a system to reduce or prevent injuries from contact with a table saw blade. Given the available documented statistics for injuries attributable to the use of this power tool, this appears to be nothing more than a solution in search of a problem - and a high priced solution as well! SawStop seeks to have mandated the CPSC the use of a single technology (theirs), creating a monopoly in their economic favor and undermining any incentive for the development of any new table saw safety technology. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users and compliance by the manufacturers, and iclearly appears to be in the best interest of safety. 

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. There will always be someone careless and get hurt no matter how many safeguards are added.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of only one method to achieve this, creating a monopoly which is not in the public interests as development of other better methods would be discouraged. CPSC should work with the power tool industry and others to promote safety through voluntary standards and better instruction labeling of power tools to prevent dangerous practices. Personal responsibility is also important as sometimes safety features interfere with practical functioning or costs.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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State: FL
City: BELLEVIEW
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ZIP: 34420
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Name: Ariel Hazi
State: CA
City: Pacific Palisades
Address: 14705 Oracle Place
Address 2:
ZIP: 90272
E-mail: ahazi@yahoo.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Scott Cunningham
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." It would create a monopoly for one lucky guy pushing this regulation and undermine the development of new table saw safety technology. Table saw safety is good already, so CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
Name: Rickey McIntyre  
State: KY  
City: Ledbetter  
Address: 566 Faye Dr.  
Address 2: 
ZIP: 42058  
E-mail: rickeymcintyre@bellsouth.net

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Name: Kevin Spurgeon
State: IA
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Address: 910 Brookview Dr.
Address 2:
ZIP: 52742
E-mail: kdspurgeon@iowatelecom.net

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Name: Steven Davidsen
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E-mail: davidsen5@mw.net

1) if it isn't broken, don't fix it. ANSI/UL 987 is working and has industry and user acceptance.
2) ANPR specifies a particular patented technology. If the ANPR is approved, it grants the patent holder a monopoly. This would stifle innovation and increase costs.

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Name: David Stuhr  
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The recent Osorio ruling against One World Technologies, Inc is a travesty of justice. Passing a regulation to further Mr. Gass's position and in effect create a monopoly would pile more insult on top of an industry that is already doing plenty to keep tools safe. Perhaps "flesh sensing technology" would have prevented Mr. Osorio's injuries. Perhaps Mr. Osorio or his employer would have disconnected or removed that technology just as they did EVERY OTHER SAFETY DEVICE THAT CAME WITH THE SAW! The decision is laughable because Osorio did not use the saw's guard or fence! This is another example of someone not being responsible for their own actions. To mandate the use of such technology after it has been patented by a single company is blatantly NOT in the public's best interests - only those of Mr. Gass, the ex Patent Lawyer. I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. -----
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Name: Mike Churchich  
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City: Hayward  
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E-mail: mchurchich@hotmail.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw. Instead of imposing a single technology, The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. Keep in mind the requirements proposed will greatly increase the cost and operating expense of table saws. In the last four years, there has been only a single demonstrated accident involving table saws with the existing safeguards. The new requirements would affect both price and reliability and are unnecessary. "Don't fix it if it ain't broke".

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E-mail: cabinetryservices@roadrunner.com

As a cabinetmaker/furniture builder who has used a table saw accident free for nearly 40 years, I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." Though I truly appreciate the innovation and would accept its mandated use in schools I believe that if Mr. Glass - the inventor and patent holder of the Saw Stop technology - is really motivated by saving tradesmen's fingers, he should first put his product (patent) in the public domain, rather than trying to dominate the market for financial gain.

The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of other (and perhaps even better) new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
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Name: Michael Holzbauer  
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the unnecessary use of a single technology, potentially creating a monopoly and would undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.  
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Robert Stewart
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E-mail: rastewar1@yahoo.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety. 
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Are you kidding me? ! ! I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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E-mail: dancolwell@yahoo.com
Name: George Davis  
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City: Smyrna  
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Address 2:  
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." I believe this technology could be improved upon and could probably be made less expensive. I think making it optional at this point would be appropriate.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." This would mandate the of a single safety system and take the right of choice out of the hands of the individual citizen. I happen to like the right to choose what tools I buy and what options (safety or otherwise) come with the tool. It is obvious to me that Mr Gass and SawStop want to become rich using the law to make it so. I question the purity of his motives and so should you. Any tool company that wants to make and sell saws with the SawStop technology is certainly within their right to do so as we as consumers should have the right to buy it or not. As a longtime woodworker I ask you not to approve this and let the consumer choose. CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process.
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Tools (like some pieces of poorly thought out legislation) are inherently dangerous... In light of this inherent risk, most people (besides a few litigious individuals looking for windfalls) realize and assume this risk as reasonable to accomplishing a task. Personally I have done more damage to my digits with hammers and knives than I ever did with a table saw... A tool that I have literally spent hundreds if not thousands of hours using without major incident.

Mr Gass invention is a clever one and fills a void in the marketplace for those occasional users who want an added layer of security, knowing they are not able to remove their digits. But I think it is ridiculous to mandate the use of this technology across the board. All tools are an accident waiting to happen in the hands of someone whose confidence far exceeds their ability. If sawstop is so wonderful why stop at table saws? Why not circular saws and mitre saws? Perhaps ladders should be sold with an inflatable landing area around them to prevent injury if someone falls off ... If one is out to protect people from themselves where do you stop?

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Stop creating more govt. rules and mandates. Looks like a lawyer with lot's of patents wants
govt. help to corner the market. STOP!

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a
table saw." The ANPR would mandate the use of a single technology, potentially creating a
monopoly and undermine the development of new table saw safety technology. Instead of
imposing a single technology that may not be appropriate for all table saws, CPSC should work
with the power tool industry and others in the table saw community to promote safety through
the voluntary standard process. The standard, ANSI/UL 987, already is working, has
demonstrated positive acceptance by table saw users, and is in the best interest of safety.

PS: Ever hear of the ZIP+4 by the US Post Office? I had to eliminate mine to send this reply.

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Hello, realizing that I have concerns about regulations in general that force people to do things, but also believe in and want to be able to buy tools that allow me to operate safely, but also believe in competition to drive innovation and price reductions.

Therefore, I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I am COMPLETELY AGAINST the ANPR. I work with table saws all the time. I've worked with them as well as all kinds of saws for years as a master carpenter. I'm an expert on power tools.

I'm the Founder of AsktheBuilder.com. You might think at first blush that I'd be all in for any safety improvement on a power tool.

But think again. At some point, the market place takes over completely - especially in the extremely litigious society we live in now.

Companies that build unsafe products are sued out of business. Companies that make SAFE tools thrive. We DON'T NEED government intervention.

This ANPR is total BS. How could you even think of imposing a requirement like this when there are SO FEW injuries from direct contact with saw blades?

When you did an autopsy on those injuries, HOW MANY of the saw operators told the TRUTH and said THEY were at fault for doing something STUPID with the saw?

You did do an autopsy, right? Tell me that you took the TIME to investigate and contact all those saw operators. Tell me that you interviewed them to find out EXACTLY what they were doing with the saw, how RUSHED they were, how DISTRACTED they were, how much MEDICATION they were on, etc.

Can you direct me to public copies of these interviews?

How many of the operators had the proper training how to use a table saw?

Please consider this TRUE story. I was at a professional event this past summer put on by a table saw manufacturer. Other professional tool writers were there. One ALMOST cut off his hand because he was using the saw wrong!

The issue with injuries is based on the fact that the operators are NOT taking the time to educate themselves.

Injuries are the fault of the OPERATOR, not the tool or equipment. Table saws don't just turn themselves ON and go hunting for a finger or hand to cut off.
How could you even THINK of doing this when it would add millions of dollars of cost to table saws and ENRICH but one man? Surely you're aware that one CLEVER man has tied up dozens and dozens of patents for this technology and he will become exceedingly rich because he has a MONOPOLY on the technology.

Let's take it a step further. Why stop at table saws?

How many people a year are injured falling from ladders? It has to be hundreds of thousands. Right?

So, in your INFINITE WISDOM, why haven't you come down on these manufacturers? Why haven't you mandated that all floors be covered with 5 inches of foam to cushion the fall so poor consumers don't get hurt?

What about power drills? Why haven't you stepped in and mandated that we use rubber drill bits so that we don't cut our hands?

What about chain saws? Now THERE'S a dangerous tool! Now you've got something to sink your teeth into.

Why haven't you mandated that the operator work in a steel cage?

Am I making myself clear?

STOP with the regulations and invest all this energy you have at the CPSC into EDUCATION. Educate the stoopid operators who are injuring themselves.

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It is absurd to impose so called flesh detection technology on table saws. Will it also be required retro fit on hand saws? routers? drill presses, chainsaws, etc? ?? oh and maybe too on scissors, kitchen knives, handmixers... axes, boxcutter knives, razor blades...

and I agree that it would be the ultimate coup for a particular patent if the governments mandates its use be required by all manufacturers of table saws. the mere thought is ridiculous!

so:
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Jerry Keller  
State: HI  
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Address 2:  
ZIP: 96792  
E-mail: Kellerjwnavy@gmail.com  

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Name: Sandy Szarkowski
State: MN
City: Plymouth
Address: 11920 44th Ave N
Address 2:
ZIP: 55442
E-mail: sjs123@juno.com

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--------
Name: Doyle Morris  
State: WA  
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Address 2:  
ZIP: 99337  
E-mail: doyledm@charter.net

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I don't think we need more regulation to force unnecessary 'safety' products on consumers. I think that the "saw stop" technology that is behind the legislation is not a bad idea at all, and I further think that it might be nice as an OPTION on the purchase of a new table saw. However, to have more government regulation is just what our country does NOT need at this time. If the 'saw stop' type of technology is vastly superior to the existing blade guards and safety devices already in use, I think the market will call for it, because the woodworkers of America have got to be smarter than a box of rocks to be building projects anyway! Have you ever looked at even the 'simple' projects in 'Woodworker' magazine? "The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology." I completely agree with that statement. Instead of 'mandating' something new, try and get rid of things that are bad first. Like irresponsible lawyers bringing frivolous lawsuits, and Judges that are hearing these things. Therein lies the crux of the situation. "The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety." 'nuff said.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." This would place a too high of a cost on small table saws. Instead of buying these new saws, people will keep in service older saws without any safety equipment installed. I believe proper handling techniques on any saw is the key to reduce injuries, not a mandate of one flesh detection brake, which wouldn't stop injuries do to kickback.

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Since the number of injuries is so low, the cost of this device would be prohibitive to consumers with negligible gain in safety. In fact the current safety standards are frequently too stringent because they interfere with optimum use of the equipment. People should be responsible for their safe use of the equipment without imposing burdensome additional cost for safety device to protect the consumer from improper use.

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Name: Fred Davis
State: CA
City: Rocklin
Address: 4501 Sentinel Ct.
Address 2: 
ZIP: 95677
E-mail: fldavis@surewest.net

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--------
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Name: Bernard Kerner  
State: NY  
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Address: 180 Hunter Avenue  
Address 2:  
ZIP: 11703  
E-mail: bakerner@hotmail.com  

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Name: Don Shandley  
State: TX  
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Address: 7821 stapleton dr  
Address 2:  
ZIP: 75025  
E-mail: Donhome@email.com

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Based on the patents on the available technology, the current proposed rule favors one company exclusively. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Jerry Osesky  
State: IL  
City: Springfield  
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Address 2:  
ZIP: 62704  
E-mail: jerryoshe@comcast.net

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--------
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." This ANPR would in effect create a monopoly for one company (SawStop), which would reap the monetary benefits, and would undermine the development of new table saw safety technology.

But more importantly, it would put an undue burden on American woodworkers, whether it is the hobbyists making personal items in their home shop, the people that want to start their own business doing what they love, or the tradesmen and companies who's businesses will suffer because of the higher costs involved with purchasing the machinery needed to supply their customers needs.

Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

It is my firm belief that instituting this rule goes against the very foundations of governing which has made America the best country in the world. Our government, rightly so, has done everything it could to prevent companies from abusing Americans through the power wielded by a monopoly. Please do not go down this road.

I, like many others, am unemployed due to the current housing situation in our country. In order to still provide for my family, I am trying to start a company of mine own, which if successful, will be able to put others to work and be something I could pass on to my children. There are many others like me who are trying to use their passion for working with wood to secure their families' future. Please do not make a decision that will hurt us and our families.

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I oppose the mandatory rule for table saws. Those at SawStop seek to mandate the use of a single technology, potentially creating a monopoly and undermining the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users. I have not been hurt by the spinning blades but have received several kick-back scares. By imposing the new technology by SawStop you are allowing people to be even more stupid. There will be people trying it just to see if it works. And then the people that will disarm the safety. Spend the money on more teaching of the proper set-up and proper use of the saw and various equipment instead of making SawStop even richer by default. Please leave us alone and keep the government out of my workshop, it's quiet and cheap in there.
Name: Vernon Glover  
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Address 2:  
ZIP: 38464  
E-mail: glovertag@hotmail.com  

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." This is strictly a money grab for Mr. Gass. The safety features developed by the various table saw manufactures work well as designed. This rule if passed, will only drive the cost of the saw up.

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Name: Dan Miller  
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Address 2:  
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E-mail: apache4dan@gmail.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." I am all for making a product safer but that needs to come from the industry as a whole and not by decree or law. I as a consumer want the freedom to choose which products available work for me and I WANT TO CHOOSE what safety features I want. I do not want that mandated. The best safety feature is my brain and I want to be able to use it. The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology.

I say again, this ANPR is bad for consumers. Furthermore it is not the American Way to force a single way of doing things and will snuff out any further safety innovation.

Thank you for not allowing this ANPR to go any further.
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Name: Linda Yates  
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Passing the ANPR to achieve a system to reduce or prevent injuries from contact with the blade of a table saw would effectively create a monopoly for the patent attorney who is lobbying for this, and this would in turn send the price of table saws soaring at a time when our economy can least sustain such a move!

Furthermore, this would impose a single technology which might not be appropriate for all table saws.

FACT: The injury data utilized by CPSC to justify moving forward with the ANPR did not include any data regarding saws with the new and improved guard system. In four years since the introduction of the new guarding systems, there has been ONLY ONE reported blade contact injury on a table saw with the new guard system. Since the 4th quarter of 2007, there has been only ONE reported incident of a table saw blade contact with the already existing improved saw blade guards. One incident! Among 800,000 USERS!

PLEASE do not ignore the fact that there is now a safety system in place that does NOT allow an attorney to achieve a monopoly. A man who will PROFIT HUGELY from this regulation should not be allowed to push through a regulation that will line his own pockets when there is already a safety measure in place that has proven to protect consumers. This is an OUTRAGE and a misuse of the system and is NOT what CPSC is all about

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I am a professional in the woodworking industry. I have managed several woodworking manufacturing facilities ranging from Sawmills, Cabinet door and Custom Cabinet Manufacturing plants with up to 360 employees. Plus I am a woodworking hobbyist. The industry have done an excellent job in self regulating themselves from preventing injuries. There is NO NEED for government to intrude.

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Name: Ed Drachenberg
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Name: Joe Morgan
State: MA
City: Maynard
Address: 13 Nason St
Address 2: 
ZIP: 01754
E-mail: spagno8@AOL.com

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I oppose the mandatory requirement of the sawstop on all saws-- the guy is only in it for the money--the power tool companies have and still are working on safety features appropriate the tools-- all table saws are not the same and safety features are different and this requirement would greatly overprice the typical benchtop/portable table saw. And I do believe this requirement would cause MORE injuries due to consumers removing the blade guards because they feel they are now "safe" and dont need the guards-- I believe this will GREATLY INCREASE eye, head, arm and body injuries with flying debris because of guard removal.

The saw stop needs to be an OPTIONAL addition to the table saw-- there are several saws already out there available to purchase that have the saw stop and to force everyone and every company to be required by law to have this is ridiculous!! Do not help pad this guys pockets!!

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I oppose the manditory monopoly that sawstop is trying to impose on the consumer-- I believe the power tool companys have all worked to make all machines a lot safer then they were in the past and an expensive one time use "safety" device like this should be optional no manditory-- Only reason the "inventor" is forcing this issue is for the MONEY!!
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I strongly oppose this mandatory saw stop-- the only reason this unit is being pushed is for personal monetary gain by the "inventor" before any rulings are made people need to be told all the facts on this product-- the increased cost of a once affordable pc of equipment, the fact that this is a ONE TIME USE item and if by accident it is set off you need to repurchase it and it is NOT cheap. This needs to be an optional item that can be purchased if the consumer feels he wants to purchase it.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Also this solution does not work for multipurpose tools like the Shopsmith, plus not everyone can afford the cost of replacing the brake every time this thing has a false trip.

Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
Name: Ron Harmon  
State: TN  
City: Lewisburg  
Address: 950 Berry St.  
Address 2:  
ZIP: 37091  
E-mail: rkharmon950@gmail.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Douglas Evans  
State: DE  
City: Wilmington  
Address: 2615 Foulk Road  
Address 2:  
ZIP: 19810  
E-mail: dwevans@comcast.net

I oppose the mandatory rule for table saws which would give a monopoly to SawStop. Those at SawStop seek to mandate the use of a single technology for the profit of SawStop. This would undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users. There are already alternatives out there, that may be better, but SawStop intends to block those devices for it's own purposes, not the common good.  
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About three weeks ago we put the Savem System on a saw stop saw. This is a large shop. They have three saw stops and three conventional table saws. After using our system they had us put the Savem System on the other two saw stops and the other three conventional saws. With our system on, the owner feels they probably will never trip the saw stop again. But if it ever does, it should do its job. We have been working with schools and woodworking clubs. We have been working shows and people have said they would buy the Savem System over the saw top by a margin of fifty to one. We feel we truly have an alternative to saw stop.

Once we get our name out to the public and show people what we have we should be able to prevent 90% of the shop accidents on five different machines at a price people can afford.

Therefore: CPSC should not pursue any action or mandatory rule that does not allow a variety of safety technologies/solutions to be available in the marketplace. SawStop is not the only solution and should not be mandated by the government.

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Name: Bob Greenwood
State: MO
City: Des Peres
Address: 11807 Lillian
Address 2:
ZIP: 63131
E-mail: beegbeeg2000@yahoo.com

It seems to me that your job is to protect stupid careless people from themselves. Well now ya want to help create a monopoly with Gass in control of it. The little whiner couldn't sell his product to the manufactures, so now he's trying to enlist the help of the CPSC to do his bidding. IF I'd want that performance feature, I'd buy a sawstop. Which I won't buy. You KNOW that the people that need that performance feature, WILL figure out a way to disable it. Oh wait, ya have to turn the performance feature on first to use it. Do something useful, instead of making gass richer than he is. Those stupid careless people will find a way to hurt themselves. Why not make them take a safety course instead.

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw."

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I can see in some situations where flesh stop technology could be a useful device (Schools, Vocational Institutions, mass production shops, etc). However, to legally mandate its addition in all new tools sold in the USA is a bad idea (not to mention the certainty of increased prices within the tool industry). Plus, there is also the elimination of individuals to take responsibility of ones own actions. We all need to practice safety when in the operation of any tool. And when mishaps do happen, we all need to accept some degree of personal responsibility that falls beyond the designed safety parameters of that tool.

Therefore, I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
Name: Matthew Longtin  
State: MN  
City: South Saint Paul  
Address: 1244 Dwane Street  
Address 2:  
ZIP: 55075  
E-mail: matthew.longtin@gmail.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw."

I oppose the mandatory rule for table saws. Those at SawStop seek to mandate the use of a single technology, potentially creating a monopoly and undermining the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users.

Energies should instead, focus on non-proprietary, non-monopolistic solutions for both new saws, and retrofits for older saws (a quality table saw will last decades if taken care of).
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

Clearly this effort on the part of SAWSTOP is designed to create a monopoly in the marketplace.

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Name: Dexter Meyer  
State: CA  
City: pleasant hill  
Address: 212 douglas lane  
Address 2:  
ZIP: 94523  
E-mail: dexmeyer1@gmail.com  

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I do not support the mandatory rule for table saws. SawStop is trying to mandate the use of a single technology, potentially creating a monopoly and undermining the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users.

I think the new riving knives and easier to use guards are really all that is needed on new saws, along with a good owners manual showing how to use the tool properly. I don't think anyone should be able to sue for getting hurt with any tool or anything if they haven't read and followed the rules that come with the machine and used the guards and safety devices that came with it.
Name: Dennis Rodrigues
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City: Tigard
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Address 2: 
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E-mail: dennis@thewoodjoint.com

I stand in opposition to any ruling that would force manufacturers to use a technology whose patents are owned by a single individual/company. This is not free enterprise and will likely not result in the best possible solutions for the consumer. Instead, I would like to see all of the power tool industry work together to promote choices, best practices and training.

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Name: Marquis Ewing
State: CA
City: Canoga Park
Address: 8360 Northgate Ave
Address 2: #208
ZIP: 91304
E-mail: marc_ewing@hotmail.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw."

As a Woodworker for more than 30 years, I believe in safety, But not an over-regulated safety mandated through Governments by the greed of an individual. My concerns are the repercussions of a monopoly on a technology so single-minded, that the industry itself may fail to develop their own solutions to safety. CPSC should ultimately work with manufacturers to help develop their own solutions.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

Maybe if you are too dumb to respect a spinning blade you don't deserve 10 fingers. Technology is not the answer and certainly not proprietary technology.

What is next....don't step in front of moving cars???
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Mandating a particular technology would reduce the incentive for that technology owner to improve or reduce cost and make it more difficult to adopt newer/better methods of injury prevention.

I am not entirely in favor of any such device as I think it could cause the operator to become careless.

These technologies are nice to have, but I am against forcing manufacturers to to implement such device. I think the average hobbyist should decide whether or not they want this.

If the manufacturers are allowed to create safety systems that are effective and cheap, these would be more readily adopted but individual consumers.

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Name: Ian Hall
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Address 2: 
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I feel that imposition of the SawStop technology on table saw manufacturers would be highly detrimental to the industry. I have been a carpenter for nearly three decades and have not had a single injury on my table saws. Although accidents happen, safety still lies as the responsibility of the user, assuming reasonable precautions have been taken by the manufacturer.

Forcing a single safety technology as a broad generalization across an entire category of manufactured products completely goes against the spirit of this country's foundation. To think that someone should not be able to manufacture a prior art product without paying an admission fee to a single latecoming patent holder is absolute absurdity.

I fail to see how this is any different from companies paying protection money to the mob.
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Name: Travis Arthur  
State: TX  
City: Lubbock  
Address: 3615 63rd  
Address 2:  
ZIP: 79413  
E-mail: trarthur@gmail.com  

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Craig Dennis  
State: MD  
City: Adelphi  
Address: 2300 Metzerott Rd  
Address 2:  
ZIP: 20783  
E-mail: cajd20@gmail.com  

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw."

Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process.

There is not a sane person who does not know there are risks involved in woodworking. There are already extremely low risk alternatives (hand tools). Increasing the cost of a well designed tool that, when used properly, is not dangerous, is exactly the wrong way to go. The voluntary process should continue.

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Name: Jeff Mueller  
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Address: 2058 NW Christopher Place  
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ZIP: 97330  
E-mail: jmcvo_junk@hotmail.com  

Background  

After college I served an 8,000 hour Bureau of Labor Apprenticeship and became Journeyman Tool & Die Maker. With additional education and thanks to many fortunate events I've been able to advance my career and am now a senior engineer at a Fortune 100 company. As an adult I began woodworking as a hobby and our son often joins me in our well-equipped hobby shop, which is equipped for woodworking and machining.  

My friends and peers consider me to be safety conscious (as do I). I understand that technology can prevent injuries that can occur any time a person ventures beyond the office or living room and spends time in the workshop or on a construction jobsite.  

However, I strongly oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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I also oppose the ANPR. I am very much for choice.

If a person wants or feels they need a specific safety technology they already have the choice to use it.

It’s obvious that the owners of the SawStop technology are out to make a whole lot of money by pushing government to require their product be adopted on other saw companies machines.

Please do not mandate this single technology! The industry is already doing a great job at promoting safety.
Name: Deborah Sloan
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City: Wiley
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Address 2: 
ZIP: 81092
E-mail: djsloan1953@yahoo.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Jerry Headley
State: MN
City: Wyoming
Address: PO 188
Address 2:
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E-mail: jheadley@wyomingmn.org

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." I think if this was mandated, it would put a lot of the affordable saws out of reach for many hobbiest woodworkers. Why can't people realize these can be dangerous and be alert and aware of what they are doing. I know that every time I use my table saw I have to pay attention to what I am doing or something bad could happen. People need to be responsible for their own actions and we do not need another law. Please do not pass this mandate.

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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
Name: Walter Ambrosch
State: PA
City: Troy
Address: 1297 Leona Road
Address 2: 
ZIP: 16947
E-mail: waltamb@eoix.net

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Keener Hachey  
State: KY  
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Address: 1257 Cox Ave  
Address 2:  
ZIP: 41018  
E-mail: keener2005@gmail.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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The government needs to simply stay out of the private sector. They take something that is totally insignificant, complicate it and pass some bogus legislation benefiting one favored company or person. They are regulating people and industry into the grave. What is next? Everyone must buy a hybrid from one certain automotive manufacture.
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. I do not believe it is the role of the Federal Government to promote monopolies. If the saws manufactured with injury reducing system are made outside North America, it will reduce employment in the industry, where there is one US, and one Canadian firm making table saws.

Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

I am a 67 year old amateur woodworker. I have never had a serious accident with a table saw, and other woodworkers I know have never had accidents either. The only accident I ever had involved the blade catching a piece of wood, and throwing it in my direction. My hands were nowhere near the blade and the injury reducing technology would not have prevented this "close call".

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I oppose the ANPR for the mandate to use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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Name: Keith Bourne  
State: WI  
City: Madison  
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology.

Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

ANPR will help to make new table saws too expensive for the non-professional to afford. Even the most stringent safety rules and advanced technologies will not prevent careless use of power tools.

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Name: Charles Jenkins  
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Address 2:  
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E-mail: buzz.jenkins@yahoo.com

I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.  
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Name: David Cooper  
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I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." This product is not a fail safe for all saw injuries, which I believe could cause consumers to feel they be less responsible in using a saw which would increase the danger. Kickbacks are also dangerous and more common occurrence with saws, and this device does not prevent one from happening. As far as I know, safety glasses are not mandatory inclusions with a saw, but certainly it is understood there is danger of eye injury. The consumer should bear some of the burden for responsible use. I have used a table saw for over 30 years without injury from the blade, and I have respect for the use of the machine. I feel we would be better served by providing more education on the safe use of a saw instead of a product that tries to compensate for unsafe use. If we try to 'fool-proof' all products, we may end up with fools using them.

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State: MN  
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Address: 526 emerson ave n  
Address 2:  
ZIP: 55363  
E-mail: gregthueringer@hotmail.com  

I oppose the mandatory rule for table saws. Those at SawStop seek to mandate the use of a single technology, potentially creating a monopoly and undermining the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to offer a variety of solutions that make sense for the entire range of table saw products and users.
I oppose the ANPR for "a system to reduce or prevent injuries from contact with the blade of a table saw." The ANPR would mandate the use of a single technology, potentially creating a monopoly and undermine the development of new table saw safety technology. Instead of imposing a single technology that may not be appropriate for all table saws, CPSC should work with the power tool industry and others in the table saw community to promote safety through the voluntary standard process. The standard, ANSI/UL 987, already is working, has demonstrated positive acceptance by table saw users, and is in the best interest of safety.

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MEMORANDUM

My comments focus on three issues: the absence of a discussion of market failure, the undocumented and speculative level of table saw injuries, and the undocumented value of benefits assigned to each injury that is expected to be prevented by the proposed regulation. The CPSC analysis in the ANPR falls short with respect to the criteria for a proper benefit-cost analysis on each of these three fundamental dimensions. A recurring theme of the discussion below is that the CPSC does not provide sufficient information for their analysis to be replicated and verified. This lack of information, which is contrary to generally accepted scientific norms, pertains to key components of the analysis, notably the number of table saw injuries and the benefit value assigned to the injuries that are expected to be prevented by the proposed regulation.

Professional Background

I am the University Distinguished Professor of Law, Economics, and Management at Vanderbilt University, where I hold tenured appointments in the Owen Graduate School of Management, the Department of Economics, and the Vanderbilt University Law School.

Throughout my career, my main research interest has focused on societal and individual responses to risk and uncertainty, with primary emphasis on health and safety risks. I currently focus on how consumers make decisions involving both the precisely understood risks and the less well understood hazards of particular products, including tobacco and drinking water. I also focus on regulatory responses to risk—such as hazard warnings, government regulation, and the role of other social institutions—and how they affect consumer behavior.

I received a Bachelor’s degree in Economics from Harvard University. While at Harvard I was inducted into Phi Beta Kappa, graduated summa cum laude, and won the Allyn A. Young Prize for the best undergraduate thesis in economics. I also received a Master’s degree in Public Policy, a Master’s degree in Economics, and a Ph.D. in Economics, all from Harvard University. My graduate dissertation analyzed how workers learn and assess employment risks, and how risk beliefs affect quitting behavior. I won the David A. Wells award for the best Harvard Ph.D. dissertation in economics.

Since obtaining my Ph.D., I have taught at several universities and held multiple tenured faculty positions. I was the John F. Cogan Jr. Professor of Law and Economics at Harvard Law
School, the Allen Professor of Economics at Duke University, and a Professor of Economics at Northwestern University. I have also been the Olin Visiting Professor at the University of Chicago. I also served for a decade as the Director of the Program on Empirical Legal Studies at Harvard Law School.

In addition to teaching, my professional engagements have included work with the federal government. In 1979, I was appointed to be the deputy director of President Carter’s Council on Wage and Price Stability, a senior executive service position within the Executive Office of the President. The primary purpose of the Council was to provide executive branch oversight for all major new federal regulations and to bring inflation under control, which was a major problem at the time. We also had input on all major economic policies, since we were a member of the economic policy group, which was President Carter’s cabinet-level group dealing with economic policy. I left that position in 1981. The Reagan administration subsequently asked me to get involved in a significant policy controversy as an expert on benefit-cost analysis. In 1982, the Occupational Safety and Health Administration performed a benefit-cost analysis of new regulations requiring that dangerous chemicals in the workplace be labeled and proposed what was known as the hazard communication regulation. The Office of Management and Budget (OMB) rejected that proposal, claiming that the costs were in excess of the benefits. Then-Vice-President Bush concluded that an expert should be brought in to settle the dispute between the agencies, and both OMB and the Secretary of Labor nominated me. Prior to this time, there was no requirement that dangerous chemicals in the workplace be labeled, and this was the most expensive regulation that the Reagan administration had considered up to that point. My report showed that the benefits did in fact exceed the costs and recommended issuing the new regulations. The regulation was issued soon after my report in support of the regulation reached the White House. One set of items that came out of this regulation are the Material Safety Data Sheets now found in workplaces across the country.

I have worked extensively with the U.S. Environmental Protection Agency (EPA), on a continuous basis from 1983 to the present, serving in several different roles. From 2002 to 2003, I was a full-time employee of that agency while on sabbatical from teaching. I have also been a member of numerous committees of EPA’s Scientific Advisory Board, including the Environmental Economics Advisory Committee, the Clean Air Act Compliance Analysis Council, and the Homeland Security Advisory Committee, on which I currently serve. I have served as a consultant to EPA on public smoking restrictions. I have directed studies for EPA regarding risk communication, morbidity risk valuation, environmental regulation enforcement, and other matters.

In addition to my extensive work for EPA, I have consulted for several other governmental entities on a variety of issues, including the U.S. Department of Labor, the U.S. Department of Justice, the U.S. General Accounting Office, the U.S. Department of Health and Human Services, the U.S. Office of Management and Budget, and the National Oceanic and Atmospheric Administration. I have also taught courses about risk, uncertainty, risk analysis, and hazard warnings to hundreds of government officials, congressional staff, and federal and state judges. I have testified before Congress on nine occasions as an expert in economics and risk analysis. This testimony addressed such topics as, for example, alcoholic beverage warnings.
I was Associate Editor on The American Law Institute Reporters’ Study, Enterprise Responsibility for Personal Injury, and co-wrote the chapter on Product Defects and Warnings.

In addition to my academic governmental work, I have also consulted for large companies, including Bic, Dupont, Anheuser-Busch, and Medline Industries, on matters such as safety devices, risk perception, and hazard warnings design.

In addition to my teaching and other professional engagements, I am heavily involved in writing and publishing scholarly research articles. My publications include authoring or co-authoring more than 20 books and 300 articles, most of which focus on risks to health and safety, including risk perception and hazard warnings. I am ranked first (in published pages in major peer-reviewed economic journals) among all economists in the world in terms of articles published on the topics of (i) risk and insurance, and (ii) health economics. I am ranked seventh among all economists in the world in terms of articles published in top peer-reviewed economics journals. I am one of the top 25 economists in the world in terms of overall citations to my work in the leading peer-reviewed scientific economics literature.

I am a founding editor of two journals: the *Journal of Risk and Uncertainty*, which publishes peer reviewed articles on issues relating to risk perception and analysis; and *Foundations and Trends: Microeconomics*. I am currently on the board of several other academic journals, including *Regulation; Journal of Law, Economics and Policy; Journal of Tort Law; Contemporary Economic Policy; Regulation and Governance; Managerial and Decision Economics; Journal of Risk and Insurance; Journal of Benefit-Cost Analysis; and The Geneva Risk and Insurance Review*. I have also held editorial positions with such journals as *American Economic Review*, which is the official journal of the American Economic Association; *Review of Economics and Statistics*, a peer-reviewed scientific journal specializing in quantitative applied economics and based at Harvard University; *Journal of Environmental Economics & Management; Public Policy; International Review of Law and Economics; and Journal of Regulatory Economics*. I have served as a peer reviewer for dozens of other publications and for government agencies from countries throughout the world.

I have won several awards for my books and articles. These include the “Article of the Year” award from the Western Economic Association for an article on the valuation of life; the “Article of the Year” award from the Royal Economic Society, an international economic society based in England, for an analysis of how ambiguous risk information influences decision-making; and the “Article of the Year” award from the American Risk and Insurance Association. I am also a four-time winner of the Kulp Award for “Book of the Year,” also awarded by the American Risk and Insurance Association. Other recent professional awards include being named Distinguished Economist of the Year by the Kentucky Economics Association, being named an Honorary Member of the Academy of Economics and Finance, and winning the University of Chicago Law School’s Ronald H. Coase Prize for an article on risk perception.

Much of my research has addressed issues specifically related to assessing the costs associated with injuries. I have done extensive empirical analysis on individual valuations of injury as well as how injuries are valued in litigation contexts. My decades of research on these topics have included analysis of a wide range of empirical data pertaining to health and safety
My estimates of the valuations of risks to life and health are currently used throughout the federal government.

Market Failure

For government regulation of a product sold in the market to be warranted, there must be some kind of fundamental market failure. Otherwise the usual economic assumption is that consumers will purchase the products that offer the mix of characteristics and product price that best match their preferences. Examples of possible market failures arising in various regulatory contexts might be externalities that affect society at large and consumer underestimation of the risks associated with the product. The CPSC never discusses the possibility of there being a market failure and, as a consequence, falls short in terms of one of the fundamental components that U.S. Office of Management guidelines should appear in a proper regulatory impact analysis.

The first type of potential market failure pertains to externalities. In this instance, the chief possible externality is financial. If the medical treatment costs associated with table saw injuries are not borne by the party who is injured but are shifted to society at large, then there is a financial externality that the purchasers of the saw may not generally take into account. The CPSC does not provide a breakdown of the private versus social benefits that are associated with the table saw regulation. The benefit components that are claimed for the regulation are for medical treatment, lost time from work, product liability litigation, and pain and suffering. Since the pain and suffering component alone constitutes 77% of the benefits of the proposed regulation, the role for the external financial cost appears to be quite modest.

Given the prominent role of the estimated private benefits in the CPSC analysis, it is perplexing that consumers don’t generally purchase saws with the safety devices proposed by the CPSC. The CPSC claims that the total annual injury cost to be averted is $2.36 billion. Presumably the actual injury costs do not outweigh the value of the increased product costs or else consumers would already purchase the product. If the averted private injury costs exceed the estimated increased product costs, consumers will purchase the safer product without the need for any regulation. That this has not occurred on a widespread basis is a red flag that should be a signal that there is something fundamentally wrong with the CPSC’s analysis.

A second potential source of market failure would occur if consumers are unaware of the risks of blade contact with saws. However, consumers are likely to be quite well informed of the

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3 Table Saw Blade Contact Injuries; Advanced Notice of Proposed Rulemaking: Request for Comments and Information, p. 12.
4 CPSC Memorandum from William W. Zamula, Performance Standards for a System to Reduce of Prevent Injuries from Contact with the Blade of a Table Saw, Sept. 9, 2011, p. 5.
risks posed by saws. The potential hazards posed by electric saws are obvious and well known, just as are the risks posed by knives and other sharp objects. The risks from saws are not hidden hazards, but are apparent visually to all users of the product. The operation of saws is loud so that the hazards posed by saws are also communicated to the consumer through the sound generated by the saw. Operation of a saw also generates vibration that serves as a continuous reminder of the risk.

The magnitude of the risk of serious injury is low. The level of the risk is an important determinant of whether risks are overestimated or underestimated. The average injury risk for benchtop table saws (i.e., the number of injuries treated in emergency rooms divided by the number of saws in the population) is $3,746/(6,536,250) = 0.000573$. If one includes all medically treated injuries, this frequency is increased by a factor of 2.01 based on the CPSC estimate of the number of total medically treated injuries relative to emergency room injuries, leading to an annual risk of 0.0012. Table saw injuries are more likely to be treated in emergency rooms than product injuries generally, and accounting for this difference implies that the ratio of total medically treated injuries to emergency room injuries is 1.28, leading to an annual injury risk of 0.000733. Irrespective of which estimate of table saw injuries is used, this annual risk per saw is very small, and the risk per cut by a saw is orders of magnitude smaller given a large number of cuts. Even over the seven year life of the saw, the discounted expected number of blade contact table saw injuries treated in emergency rooms is 0.0036 if the injuries occur at the start of the period and 0.0035 if the injuries occur at the end of the period. These injuries over the life of the saw have been discounted since the benefits of the regulation will equal the discounted number of injuries prevented multiplied by the economic value per injury. Empirical studies of patterns of individual risk perceptions, including studies I have undertaken, have shown that people tend to overestimate such small risks. Thus, the available data indicate that the risks from saws will be both well known to consumers and in all likelihood overestimated rather than underestimated.

Should there be a problem of risk underestimation, it is not necessary to institute a technology-forcing regulation. Warnings and the provision of information about the safety
benefits of saws with the protective devices comprise a policy option that the CPSC could use to address such a deficiency in consumer beliefs. The CPSC does not address this policy alternative in the ANPR and show why it is not a feasible policy option that could achieve the same claimed benefits.

A third source of potential market failure is the possibility of a monopoly in the industry coupled with barriers to entry that prevent firms from offering table saws with safety devices that would be desired by consumers. There is no evidence that there are barriers to entry in the market for saws that would prevent the normal aspects of economic competition. New firms can enter the market and offer saws with safety devices. And since there are multiple manufacturers of table saws, it is possible for existing firms to market saws with the safety device specified in this ANPR. To the extent that there is a potential entry barrier it is with respect to the patents for the SawStop device, which may impede efforts to develop similar safety devices that do not infringe on the patent.

With respect to market operation, it should be noted that there is usually substantial heterogeneity in consumer preferences. Consumers who value safety greatly or who face greater risks will find purchasing a saw with the protective technology more desirable. Normal market operations permit such a matching of preferences with product characteristics. The CPSC analysis focuses only on total benefits and total costs to society without any recognition of the differences among consumers. Consumers who do not value the technology and who forego purchase of a saw due to the added cost will suffer a welfare loss in terms of a lost consumer surplus. Some consumers will consequently not purchase the more expensive saws. Similarly, consumers who continue to purchase table saws but who value the technology less than the additional cost will also suffer a welfare loss. The CPSC never addresses the harm to consumers and the differences across the consumer population in terms of the welfare losses that are incurred. Such losses could be avoided through a regulatory approach that relied on information and permitted consumers to make their own purchase decisions.

Estimate of the Total Number of Injuries

The regulation addresses table saw injuries arising from blade contact. The CPSC analysis is based on injury estimates derived from its NEISS sample of product injuries treated by hospital emergency rooms, which it then projects to obtain a national injury estimate. Using the NEISS data, the CPSC projects that there are 33,450 such blade contact injuries annually that receive emergency room treatment.9 Using this emergency room treatment number, the CPSC then projects a total of 67,300 medically treated injuries. However, it gives no basis for this projection that more than doubles the total number of injuries that might potentially be prevented by the regulation. Such a doubling of the injury total is surprising since one would expect that

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9 CPSC, ANPR Briefing Package, Recommended Advance Notice of Proposed Rulemaking for Performance Requirements to Address Table Saw Blade Contact Injuries, Sept. 14, 2011, p. 2.
serious injuries such as are expected from contact with a spinning saw blade would receive emergency room treatment. Estimates making this adjustment suggest that a more accurate estimate of the total medically treated injuries is 42,814. The CPSC’s adjustment factor for transforming the emergency room injury total to the total medically treated total leads to a doubling of the benefits of the regulation. In the absence of a formal justification specifically linked to saw-related injuries, the CPSC’s multiplication of benefits by a blow-up factor is entirely arbitrary. CPSC should provide justification this doubling of the number of injuries.

Other estimates of saw-related job injuries differ from those of the CPSC. Using the NIOSH hospital sample, the average total number of work-related injuries for table saws treated in hospital emergency rooms over the decade 2000 to 2010 is 9,518, which is below the CPSC estimate. As in the case of the NEISS data, these estimates are based on a projection from a national sample of emergency rooms. The number of hospitals included is 67, as compared to the NEISS sample of 101 hospital emergency rooms.

There is a greater injury count disparity if the focus is on more serious table saw injuries, which are those work injuries sufficient to lead to the loss of some work. Data are available from the U.S. Bureau of Labor Statistics for injuries sufficient to lead to a lost workday, and these injuries are categorized by the source of the injury. In 2010 there were only 920 such injuries involving table saws, of which 130 were amputations. Even expanding the types of saws considered to the more aggregative category of all sawing machinery-stationary, such as band saws and radial arm saws, the total number of job injuries from all kinds of saws is 2,670 of which 340 are amputations.

This comparison of the injury statistics based on the CPSC’s assessment of job-related injuries with job injury data for other saw injury data indicates a discrepancy. At the very least, this difference suggests that most of the injuries of concern to the CPSC are not serious in nature.

This discrepancy in the job injury totals also may call into question the CPSC’s practice of doubling the number of emergency room cases to get a total medically treated injury number. The CPSC provides no empirical basis for this blow-up factor, which could have been set at 1.01 or some other ratio with no less justification. More important is that to the extent that more serious injuries are more likely to be treated in emergency rooms than receive other kinds of medical treatment, the mix of injury severity based on the NEISS data overstates the severity mix

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12 U.S. Bureau of Labor Statistics, Table R25, Number of nonfatal occupational injuries involving days away from work by source of injury and selected nature of injury or illness, private industry, 2010. While lost workday injuries do not include all saw-related injuries, they do include more serious injuries such as those meriting the average cost per injury value of $35,000 assigned by the CPSC.
once the injury total is multiplied by the blow-up factor. This change will produce an overstatement of the level of benefits of the proposed regulation.

**Economic Value of Injury Risks**

The injury components considered by the CPSC are the following: medical treatment, lost time from work, product liability litigation, and pain and suffering. The CPSC does not provide supporting data for any of these components. Moreover, it never indicates whether any of the data that it did use are specific to saw-related injuries. There is no reason to believe that a generic mix of product injuries will have the same mix of health outcomes as injuries related to table saws. Moreover, the CPSC’s analysis falls short of the usual scientific norms in that there is no opportunity to replicate the CPSC analysis so as to properly assess the validity of the CPSC’s estimates.

The lack of justification for the approach calls into question some fundamental aspects of the agency’s conceptualization of the benefit assessment categories. For example, counting product liability litigation costs as well as economic loss and pain and suffering may lead to double counting. If claimants pay for their attorney fees on a contingency fee basis, these fees would already have been subsumed into the other damages components. Thus, there are no additional claimant litigation costs to be counted in such instances.

The fundamental economic principle for assessing benefits from public programs is society’s willingness to pay for the benefit. This willingness-to-pay value is an *ex ante* amount before any accident has occurred rather than a retrospective assessment of damages and pain and suffering. For the portion of the benefits that are private benefits, as most of the estimated benefits are in this instance, an examination of an informed consumer’s willingness to pay for the safety device is the pertinent benefits measure. Marketing information suggests that this value is relatively modest. After being shown a video describing the benefits of the SawStop technology, consumers indicated that their willingness to pay for the safety device was $140 for such a device for a benchtop saw and $222 for a cabinet saw.\(^\text{13}\) Although stated willingness-to-pay values elicited in a survey context may overstate actual willingness to pay, well designed studies of this type can provide meaningful guidance regarding the magnitude of the private benefits. The CPSC could potentially refine such estimates with further stated preference studies and use such values instead of attempting to construct them.

Instead, the CPSC adopts a retrospective piecemeal approach and attempts to value the different components of the benefits, leading to an assignment of a value of $35,000 to each prevented injury derived from its Injury Cost Model. Based on the mix of injuries requiring hospitalization and those not requiring hospitalization, the CPSC has estimated an injury cost substantially higher than the average cost of all product-related injuries. The CPSC provides no information regarding the components of the model, the sources of the data, or how the analysis

\(^{13}\) Report by Jim Benton and Jeff Turner, DeWalt-SawStop, “Pre-Milestone User Work/Trigger document.”
has been applied to generate a meaningful injury cost estimate for saws. Moreover, such assessments are not *ex ante* willingness to pay values.

The CPSC indicates that 77% of the benefits are derived from pain and suffering based on Jury Verdict Reports.\textsuperscript{14} The appropriate economic measure of such pain and suffering benefits is derived from an assessment of the individual’s willingness to pay to avert small risks of pain and suffering before such an injury has occurred. Such an analysis can then be used to determine the value per expected product injury. Thus, the proper benefits measure is derived from an *ex ante* valuation amount by the individual table saw consumer rather than a value awarded by the juries after the injury to the person who has incurred an injury with certainty. There is no reason for jury awards to be an accurate measure of the consumer’s willingness-to-pay value.

In addition, even if jury awards corresponded to willingness-to-pay amounts for those particular cases, there is no justification for applying these values to all saw injuries. The cases that are decided by court verdicts suffer from important selection effects that make these verdicts unrepresentative in ways that will overstate the costs per injury.\textsuperscript{15} The first selection stage is that not all saw injuries lead to lawsuits. The less serious injuries will not lead to claims being filed and hence will have a zero pain and suffering payment. The second stage of selection is that cases that lead to court verdicts are unrepresentative of all litigated cases. Those cases that are dropped and have zero pain and suffering payment or are settled for a possibly low pain and suffering payment tend to have lower stakes than those that are litigated. The third limitation of the pain and suffering estimates is that the Jury Verdicts Research data are not based on a representative national sample. These data are a convenience sample including publicized cases and are not a random national sample. As a result, they will tend to be skewed toward the larger stakes cases. Finally, there is no indication that any of the Jury Verdicts Research pain and suffering estimates used by the CPSC pertained to saw injuries of if they reflected the mix of injury types associated with saws.

\textsuperscript{14} Memorandum, Sept. 9, 2011, supra note 3, p. 5.
Table Saw Operator Blade Contact Injuries:
Review and Analysis of Injury and Social Cost Estimates

Submitted To:

Power Tool Institute
1300 Sumner Avenue
Cleveland, OH 44115

Submitted By:

Stephen C. McGonegal
Senior Staff Associate
Econometrica, Inc.
4416 East-West Highway, Suite 215
Bethesda, Maryland 20814

February 28, 2012
February 28, 2012

Susan Young
Power Tool Institute
1300 Sumner Avenue
Cleveland, OH 44115


Dear Ms. Young:

Econometrica is pleased to submit a copy of our report, “Table Saw Operator Blade Contact Injuries: Review and Analysis of Injury and Social Cost Estimates,” which was produced pursuant to the above-referenced contract.

If you have any questions or need any additional information, please feel free to contact me at (240) 333-0250.

Sincerely,

Econometrica, Inc.

[Signature]

Stephen McGonegal
Senior Staff Associate
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Introduction and Summary

In October 2011, the Consumer Product Safety Commission (CPSC) issued an Advanced Notice of Proposed Rulemaking (ANPR) to seek public comment on whether or not to establish a new mandatory standard that would address safety risks associated with consumer use of table saws. The ANPR includes estimates of the annual numbers of emergency department (ED) and other medically attended blade contact injuries, as well as an annual estimate of the aggregate cost of these injuries to society. The injury cost estimate was generated from the CPSC Injury Cost Model (ICM), which computes the projected medical, productivity, and other tangible costs associated with specific types of injuries, as well as a value for the intangible costs typically referred to as “pain and suffering.”

Based on CPSC’s 2007–2008 special study, staff estimated that approximately 33,450 emergency department-treated blade contact injuries occurred annually over the 2-year period 2007–2008. From these 33,450 annual injuries, the ICM projects an annual total of 67,300 medically treated blade contact injuries with an associated injury cost of approximately $2.36 billion per year... CPSC staff’s preliminary review showed that societal costs per blade contact injury amount to approximately $35,000. This includes costs for medical treatment, lost time from work, product liability litigation, and pain and suffering. The relatively high societal costs, compared to the $22,000 average cost for all medically treated consumer product related injuries, reflect the high costs associated with amputations and the relatively high hospitalization rate associated with these injuries.¹

The ANPR solicited comments concerning “the risk of injury associated with table saw blade contact, the regulatory alternatives discussed in this notice, other possible means to address this risk, and the economic impacts of the various alternatives.”²

Econometrica, Inc., was retained by counsel for the Power Tool Institute (PTI) to assist in the preparation of its comments submitted in response to the ANPR. Our specific assignment was to review the 2007–2008 CPSC injury prevalence and social cost estimates presented in the ANPR; determine whether the CPSC correctly estimated the annual number of medically attended injuries associated with the use of table saws; and identify and apply appropriate methods to value the benefits of reductions in the numbers of these injuries.

Our review and analysis shows that the CPSC estimates of the number of medically attended blade contact injuries and the aggregate social costs of these injuries are significantly overstated. More specifically:

1. The methodology CPSC uses to extrapolate from ED-treated injuries to all medically attended injuries does not take into account the fact that table saw injuries are likely to be more serious, and thus more likely to require treatment in a hospital ED, than injuries involving fingers, wrists, hands, and lower arms that are associated with other consumer products. Our analysis indicates

² CPSC ANPR, p. 62679.
that there were approximately 42,800 medically attended injuries annually during 2007–2008, rather than the 67,000 estimated in the CPSC ANPR.

2. The approach CPSC uses to value the intangible costs of injuries is based on estimates from an unrepresentative sample of jury awards and settlements involving unrelated products, motor vehicles, and premises liability. Moreover, the inflators used to “roll-forward” older ICM model values to estimate 2008 dollar costs produce much higher unit cost estimates than if reasonable alternative methods were used to adjust for changes in prices and wages over time.

3. Our analysis indicates that the 2008 tangible and intangible social costs associated with table saw blade contact injuries were about $1.39 billion, less than 60 percent of the CPSC cost estimate of $2.36 billion. Per-injury costs are estimated in our analysis at about $32,500, which is somewhat lower than the CPSC estimate of $35,000. It is also important to keep in mind that the per-injury costs in our analysis are derived from a much smaller number of injuries which are more likely on average to be treated in hospital EDs and to result in hospital admissions. Applying our cost valuation model to the mix of injury types and levels of treatment estimated in the CPSC special study would yield a per-injury cost estimate of just under $30,000.

The methodology used to derive these results and obtain these conclusions is presented in detail below.

**CPSC Estimate of the Annual Costs to Society of Consumer Injuries from Table Saw Blade Contact**

Three data sources were used to develop the CPSC estimate of the social cost associated with table saw blade contact injuries: incident reports from approximately 100 hospital EDs participating in the CPSC product injury monitoring network; a CPSC special study of 2007–2008 table saw injuries; and the data and projections embedded in the ICM. The ICM includes component modules to estimate medically attended injuries not treated in hospital EDs; computes medical and productivity costs for specific types of injuries; applies markups to account for insurance and product liability (PL) litigation costs; and projects the intangible costs of pain and suffering using data on jury awards and settlements. The specific steps in calculating the CPSC estimate of the annual social cost associated with table saw blade contact injuries are as follows:

1. **ED-Treated Injuries Associated with Table Saws** – Annual estimates of product-related injuries are developed using data from incident reports that CPSC collects and reports on ED-treated injuries associated with consumer products in its National Electronic Injury Surveillance System (NEISS) network. These reports are reviewed to exclude cases that are work-related (and therefore out of the scope of CPSC jurisdiction) and coded to facilitate more efficient and consistent identification of cases with specific injury types, levels of treatment, and consumer product involvement. A set of statistical weights is applied to the incident reports from the NEISS hospital ED sample to generate the estimated number of injuries.

2. **Determining the Fraction of ED-Treated Injuries Associated with Table Saws that are Attributable to User Contact with the Blade** – This estimate is developed using data from a CPSC
special study of 2007–2008 table saw injuries. CPSC staff and contractors were able to complete in-depth investigations (IDIs) for about 800 incident reports identified from the 2007–2008 NEISS database. The results from this study were used to translate the annual NEISS-based estimate for all consumer table saw injuries into an estimate of the number of injuries that specifically involved operator contact with the blade.

3. **Extrapolation of ED-Treated Injuries to Estimate Total Medically Attended Injuries** – One component of the ICM projects the annual number of all medically attended injuries from the estimated number of injuries treated in hospital EDs. ICM extrapolation factors are used to estimate the number of injuries treated in clinics and doctors’ offices, as well as the (comparatively few) number of cases in which the patient is directly admitted to the hospital without going through the ED.

4. **Estimating the Medical, Productivity, and Administrative Costs Associated with Product-Rated Injuries** – The ICM also contains several modules that estimate specific components of the tangible costs associated with injuries associated with consumer products. Among these costs are the expenditures (both reimbursed and out-of-pocket) for medical treatment and emergency services; the immediate and continuing lost wages and lost value of non-work activity (“household production”) attributable to the injury; the administrative costs associated with health insurance; and the (non-award, non-settlement) costs of product liability litigation.

5. **Valuing the Intangible Costs Associated with Product-Rated Injuries** – The largest part of overall social costs attributed to injuries stems from the ICM valuation of pain and suffering, rather than from the costs of medical treatment, lost time from work, or other tangible outcomes from consumer injuries. In the CPSC ICM, valuation of these pain and suffering costs is based on a module that applies the results of an analysis of reported jury verdicts and settlements.

This report presents a review and critique of each of these components of the CPSC injury cost estimate for table saw blade contact injuries and provides alternative estimates of medically attended injuries and annual social costs based on analysis of the NEISS data, review of the injury cost valuation literature, and application of procedures and estimates used by other U.S. Government agencies, including the Centers for Disease Control and Prevention (CDC), the Federal Highway Administration (FHWA), and the Federal Motor Carrier Safety Administration (FMCSA).

**National Electronic Injury Surveillance System (NEISS) Estimates of Table Saw-Related Injuries**

Reports of product-related injuries are collected in a nationally representative network of approximately 100 hospital EDs that participate in the NEISS. The NEISS hospital sample is structured to support the development of statistically valid estimates of product-related injuries treated annually in hospital EDs.

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4 Econometrica, Inc., is currently updating estimates of the crash costs associated with accidents involving large trucks for the Federal Motor Carrier Safety Administration (FMCSA). The analysis and opinions presented in this report have not been reviewed or endorsed by FMCSA or any of its representatives.
Each incident report includes a brief incident narrative and coded fields for the injury type ("diagnosis"), part of the body involved, level of treatment ("disposition"), and location (home, school, etc.), as well as the age, race, and gender of the patient.\(^5\) Specific products associated with particular injuries are identified using a set of four-digit product codes developed by the CPSC.\(^6\) Reports from each hospital are also assigned statistical weighting factors, which are discussed in more detail below.

For our analysis, we extracted all of the incident reports available from the NEISS database for 2007 and 2008 in which table saws are cited as a product associated with an ED-treated injury. There were about 800 reports in each of these 2 years.\(^7\)

### 2007–2008 NEISS Case Counts for ED-Treated Injuries Associated with Table Saws

<table>
<thead>
<tr>
<th></th>
<th>2007</th>
<th>2008</th>
<th>Average</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Hospitalized</td>
<td>Treated and Released</td>
<td>Hospitalized</td>
</tr>
<tr>
<td>Amputation</td>
<td>43</td>
<td>71</td>
<td>31</td>
</tr>
<tr>
<td>Fracture</td>
<td>17</td>
<td>102</td>
<td>15</td>
</tr>
<tr>
<td>Laceration</td>
<td>29</td>
<td>449</td>
<td>21</td>
</tr>
<tr>
<td>Avulsion</td>
<td>2</td>
<td>38</td>
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<tr>
<td>Other</td>
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<td>3</td>
</tr>
<tr>
<td>All Cases</td>
<td>92</td>
<td>697</td>
<td>71</td>
</tr>
</tbody>
</table>

National estimates of injuries are generated from these case reports using the statistical weights assigned to each hospital in the sample. The NEISS sample of hospital EDs is “stratified,” or subdivided, into five groups, based on annual patient loads. Different percentages of each group are included in the NEISS sample, because the range of variation among individual EDs is expected to be greater for the group of hospitals that serve the largest average number of patients. The division of the NEISS hospital ED sample into the five sampling strata is as follows:

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\(^5\) Most product-related incidents that occur at work locations are not included in the NEISS database. However, the database may include some cases that involve injuries at home-based businesses or home workshops in which items are produced for sale.

\(^6\) The NEISS incident reports are available for download at [http://www.cpsc.gov/library/neiss.html](http://www.cpsc.gov/library/neiss.html). The product code for table saws is 0841.

\(^7\) PTI member companies report receiving an average of 80 notices or claims of injury annually.
Using the CPSC-assigned statistical weights, we developed 2007–2008 average annual estimates of table saw-related injuries for the most common diagnoses reported. The injury estimate for the 2-year period obtained is 72,400, which is nearly identical to the CPSC special study estimate of 72,900 injuries for product code 0841. However, the CPSC special study incorporates three additional corrections that result in an adjusted estimate of 76,100 injuries to operators during the 2-year period.\(^8\) We included a scaling factor in our calculations to ensure that the detailed estimates in this report are directly comparable to those in the ANPR.

According to the CPSC special study, 88 percent of the investigated injuries to operators involved blade contact. Applying this percentage to the CPSC estimate yields a projected 66,900 blade contact injuries during the 2-year period, an average of 33,450 annually.\(^9\) The CPSC estimates indicate that more than half of table saw injuries involving blade contact (62 percent) are lacerations. Most of the others are fractures (15 percent), amputations (11 percent), or avulsions (7 percent). The overwhelming majority of these injuries (95 percent) involved fingers, hands, wrists, or lower arms.\(^10\)

Several PTI members expressed reservations about the overall validity of the CPSC estimates of ED-treated injuries. A particular source of concern is that the share of amputation injuries that do not require hospitalization may be unrealistically large. One way to test whether this concern may be valid is to compare injury estimates based on reports from NEISS hospitals that participate in the All Injury Program (AIP)—which collects reports on injuries in workplaces and those that are not associated with consumer products—with those that report only consumer-related injuries.\(^11\) The injury patterns from

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\(^8\) The CPSC estimate includes adjustments to exclude cases in product code 0841 that did not actually involve table saws and cases in which the operator of the saw was not the injured party. The CPSC estimate also includes a prorated share of the cases from two other “catch-all” codes (0863 other power saws and 0845 saws not specified). All of these adjustments appear to have been made on the basis of the results from the CPSC special survey, rather than from direct review of the individual incident report.

\(^9\) As noted above, these estimates are derived by applying statistical weights to the incident counts from each of the 100 hospital EDs in the NEISS network. It is worth noting that 2 of the 100 hospitals account for nearly 10 percent of the overall injury estimate.

\(^10\) Because very few of these blade contact injuries involve other types of injuries or other parts of the body besides fingers, only these types of injuries were included in our analysis. The impact of omitting other types of injuries on the overall estimates is negligible.

these two groups of hospitals within the overall NEISS sample should be consistent with each other, or, at a minimum, the differences between the two should not be statistically significant. In other words, if the hospitals in the AIP sample account for 65 percent of the weighted value of the overall NEISS sample, similar percentages of various types of table saw blade contact injuries should be based on incident reports from the AIP hospitals.

The following table shows the results for each of the four major types of table saw injuries:

<table>
<thead>
<tr>
<th></th>
<th>Sum of weights</th>
<th>Amputations</th>
<th>Fractures</th>
<th>Lacerations</th>
<th>Avulsions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>AIP Hospitals</strong></td>
<td>3,026</td>
<td>4,106</td>
<td>6,738</td>
<td>28,204</td>
<td>3,328</td>
</tr>
<tr>
<td><strong>All NEISS Hospitals</strong></td>
<td>4,662</td>
<td>7,840</td>
<td>10,860</td>
<td>44,968</td>
<td>5,130</td>
</tr>
<tr>
<td><strong>% in AIP hospitals</strong></td>
<td>64.9%</td>
<td>52.4%</td>
<td>62.0%</td>
<td>62.7%</td>
<td>64.9%</td>
</tr>
</tbody>
</table>

For three of the injury types (fractures, lacerations, and avulsions) the proportion of injuries attributable to AIP hospitals is consistent with the sampling weights for these hospitals. However, the non-AIP hospitals account for a disproportionate share of the amputation injuries: only 52 percent of the amputation injury estimate is based on case reports from the approximately 65 percent of NEISS hospitals that participate in the AIP. This difference is statistically significant (at the 95-percent confidence level).

The special study does not report separate estimates of hospitalized and non-hospitalized injuries on a diagnosis-specific basis. The discussion below makes clear that this distinction is critical in estimating the number of medically attended injuries and the social costs attributable to those injuries. Accordingly, we developed disposition-specific (hospitalized, non-hospitalized) amputation injury estimates for AIP hospitals and computed the percentages that they represented of the estimates for the entire NEISS hospital sample. For injuries resulting in hospitalization, the AIP share of the total (62.5 percent) was consistent with the share predicted from their sampling weights. However, the AIP share of amputation ED-treated injuries that did not result in hospitalization was much lower than could be explained by random statistical variation—only 47.2 percent of the overall estimate of these injuries is based on case reports from the AIP hospitals that account for 64.9 percent of the NEISS sample on a weighted basis.

It is therefore appropriate to adjust the NEISS injury estimate for amputation injuries that do not result in hospitalization to account for this statistical anomaly. Diagnosis-specific estimates of hospitalized and other ED-treated injuries that reflect this adjustment are shown in the table below.\(^\text{12}\)

\(^{12}\) These estimates were calculated using the case dispositions coded in the NEISS 0841 incident reports, with a scaling factor applied to ensure that the overall hospitalization rate matched that reported for all table saw operator blade contact injuries in the CPSC special study. The estimate of amputation injuries that did not result in hospitalization is based on the rate estimated at the AIP hospitals in the NEISS network.
### Estimated ED-Treated Table Saw Blade Contact Injuries (2007–2008 average)

<table>
<thead>
<tr>
<th></th>
<th>Hospitalized</th>
<th>Not Hospitalized</th>
<th>Total</th>
<th>Percent</th>
<th>Percent of Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amputation</td>
<td>1,069</td>
<td>2,142*</td>
<td>3,211</td>
<td>33</td>
<td>9.8</td>
</tr>
<tr>
<td>Fracture</td>
<td>414</td>
<td>3,734</td>
<td>4,148</td>
<td>10</td>
<td>12.7</td>
</tr>
<tr>
<td>Laceration</td>
<td>699</td>
<td>21,344</td>
<td>22,044</td>
<td>3</td>
<td>67.5</td>
</tr>
<tr>
<td>Avulsion</td>
<td>49</td>
<td>3,095</td>
<td>3,144</td>
<td>2</td>
<td>9.6</td>
</tr>
<tr>
<td>Other</td>
<td>3</td>
<td>97</td>
<td>100</td>
<td>3</td>
<td>0.3</td>
</tr>
<tr>
<td><strong>All Cases</strong></td>
<td><strong>2,235</strong></td>
<td><strong>30,412</strong>*</td>
<td><strong>32,647</strong></td>
<td><strong>7</strong></td>
<td></td>
</tr>
</tbody>
</table>

*Based on AIP hospital ED injury rate for amputation injuries that did not require hospitalization.

### Estimating the Total Number of Medically Attended Blade Contact Injuries

Not all consumer product-related injuries are treated in hospital EDs. The CPSC ICM contains a module that estimates the number of medically attended injuries that are treated in other settings, primarily doctors’ offices and hospitals. These projections of non-ED treated injuries are based on 1995 National Health Interview Survey (NHIS) data, which were used by Miller et al. (the developers of the CPSC ICM) to estimate separate ratios of non-ED treated to ED-treated injuries for cases that involved admission to the hospital and those that did not. Overall, Miller et al.’s estimates indicated that half (5.3 million of 10.6 million total) of consumer product injuries in 1995 with one of the four most common table saw injury relevant diagnoses were treated in hospital EDs. Nearly all of the remainder were treated in other health care facilities, although a small number of patients were estimated to have been directly admitted to hospitals, bypassing the ED.  

### ICM Shares of ED and non-ED Treated Injuries by Diagnosis (All Product-Related Injuries)

<table>
<thead>
<tr>
<th>NEISS Injury Diagnosis</th>
<th>Non-Admitted Doctor or Clinic</th>
<th>Non-Admitted Emergency Department</th>
<th>Hospital-Admitted Direct</th>
<th>Hospital-Admitted Via ED</th>
<th>Non-ED to ED Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amputation</td>
<td>19,281</td>
<td>19,883</td>
<td>943</td>
<td>6,063</td>
<td>97% 16%</td>
</tr>
<tr>
<td>Fracture</td>
<td>2,185,070</td>
<td>1,571,812</td>
<td>43,192</td>
<td>277,760</td>
<td>139% 16%</td>
</tr>
<tr>
<td>Laceration</td>
<td>2,951,741</td>
<td>3,284,952</td>
<td>5,021</td>
<td>32,290</td>
<td>90% 16%</td>
</tr>
<tr>
<td>Avulsion</td>
<td>95,788</td>
<td>78,841</td>
<td>149</td>
<td>955</td>
<td>121% 16%</td>
</tr>
<tr>
<td>Combined</td>
<td>5,251,880</td>
<td>4,955,488</td>
<td>49,305</td>
<td>317,068</td>
<td>106% 16%</td>
</tr>
</tbody>
</table>


This approximate 1:1 ratio between ED and non-ED treated injuries is reflected in the CPSC ANPR estimates of 2007–2008 table saw injuries—the 33,450 annual estimate of ED-treated injuries is translated into an overall estimate of 67,300 medically attended injuries. Thus, fully half of the injuries

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for which injury costs are computed and reported in the ANPR are imputed on the basis of a set of extrapolation factors developed for all consumer products generally. This imputation of non-ED treated table saw injuries therefore assumes that the average injury severity level (and thus the likelihood of seeking ED treatment) is comparable to that for other types of products. Based on the hospitalization rates for table saw injuries estimated from the CPSC NEISS data, this is clearly not the case.

Specifically, the ANPR reports that a relatively high percentage (7 percent of all cases and 27 percent of those involving amputations) of ED-treated table saw injuries results in hospitalization. Estimates based on the NEISS data for product 0841 show even higher percentages of injuries that result in hospitalization (9 percent overall and 34 percent for amputations). These comparatively high rates of hospitalization strongly suggest that blade contact injuries are much more likely to be treated in hospital EDs, rather than in doctors’ offices or clinics, relative to injuries involving other types of products.\(^\text{14}\)

To develop alternative estimates of medically attended injuries not treated in hospital EDs, we used the 2007–2008 NEISS data to calculate the diagnosis-specific hospitalization rates for table saws and all other types of products. To ensure comparability, these hospitalization rates were calculated for injuries involving one of the four parts of the body most likely to be involved in blade contact injuries: fingers, wrists, hands, and lower arms.

**Hospitalization Rates for Table Saws and Other Products**

<table>
<thead>
<tr>
<th>Injury Diagnosis</th>
<th>Table Saws</th>
<th>Other Products</th>
<th>Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amputation</td>
<td>33.8%</td>
<td>18.1%</td>
<td>187%</td>
</tr>
<tr>
<td>Fracture</td>
<td>12.8%</td>
<td>4.1%</td>
<td>312%</td>
</tr>
<tr>
<td>Laceration</td>
<td>3.9%</td>
<td>0.8%</td>
<td>463%</td>
</tr>
<tr>
<td>Avulsion</td>
<td>2.0%</td>
<td>1.2%</td>
<td>166%</td>
</tr>
</tbody>
</table>

According to these estimates, amputations involving table saws were 87 percent more likely than amputations involving other consumer products to result in admission to the hospital. The disparities in hospitalization rates are even more pronounced for cases involving fractures and lacerations—patients sustaining these injuries while using a table saw are 212 and 363 percent more likely, respectively, to be hospitalized than those incurring these types of injuries while using other consumer products.

These contrasting hospitalization ratios provide compelling evidence that table saw injuries are much more likely to be treated in hospital EDs than is the case for other types of consumer product injuries involving fingers, wrists, hands, and lower arms. Consequently, we applied these ratios to the Miller et al. injury extrapolation factors and used the adjusted rates to project the numbers of non-ED treated table saw injuries that did not result in direct admission to hospital.

\(^{14}\) In addition, our tabulations show that approximately one-third of table saw injuries occur on Saturdays and Sundays, when these other types of health care facilities are much less likely to be open.
These calculations show that the CPSC ICM projection of medically attended injuries is substantially overstated: taking into account the disparate severity of table saw injuries reduces the estimated annual number of medically attended injuries from 67,300 to 42,814 (or 36 percent fewer injuries annually).

### Medically Attended Table Saw Injuries by Diagnosis and Disposition (2007–2008 average)

<table>
<thead>
<tr>
<th>NEISS Injury Diagnosis</th>
<th>Non-Admitted</th>
<th>Hospital-Admitted</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Doctor or Clinic</td>
<td>Emergency Department</td>
</tr>
<tr>
<td>Amputation</td>
<td>1,198</td>
<td>2,142</td>
</tr>
<tr>
<td>Fracture</td>
<td>1,791</td>
<td>3,734</td>
</tr>
<tr>
<td>Laceration</td>
<td>4,465</td>
<td>21,344</td>
</tr>
<tr>
<td>Avulsion</td>
<td>2,439</td>
<td>3,095</td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td><strong>9,893</strong></td>
<td><strong>30,315</strong></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

To determine the impact of these revised injury estimates on the CPSC social cost estimate, it is necessary to replicate (and where appropriate, revise) estimates of tangible and intangible costs generated by the ICM.

**Medical, Productivity, and other Tangible Costs Associated with Table Saw Injuries**

The largest and most detailed components of the ICM are the modules that calculate the medical, work-related, and administrative costs attributable to product-related injuries. Some of these costs are borne by the injured consumer, while others are incurred by health insurers, employers, and (in the case of product liability litigation) the legal system. The medical costs in particular are developed using a large collection of health care data sets; these estimated costs vary by the type of injury and the level of treatment required. The productivity loss estimates are based on a more limited number of data sources that are used to calculate the probability and duration of work-loss days and average wages. A separate estimate of the value of lost household services is also computed. Additional cost components estimate the cost of processing health claims and a pro-rated share of the non-payment costs associated with product liability litigation.

Setting up and running the entire ICM is beyond the scope of this analysis. However, the limited number of injury types associated with blade contact injuries makes it possible to replicate (or at least approximate) the tangible cost estimates generated by the ICM without having to undertake this task.

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15 A September 2007 memorandum by CPSC economist William Zamula, “Revised Medical Cost Estimates for the Injury Cost Model,” indicates that the ICM medical cost modules were updated in 2006 by the Pacific Institute for Research and Evaluation (PIRE), the successor firm to Public Services Research Institute. As best we can determine, documentation of these revisions was not publically available at the time our review and analysis was conducted.

16 A full description of the methods used to estimate each of these component costs is beyond the scope of this paper.
To estimate the costs that would be projected by the ICM, we relied on a set of summary cost estimates presented by Miller and his colleagues (hereafter, Zaloshnja et al.) in a study of motor vehicle crash costs prepared for the National Highway Traffic Safety Administration (NHTSA).\(^{17}\) Separate sets of summary cost estimates are available for injuries affecting different regions of the body and varying severity levels. Severity is measured using a six-point Injury Impairment Scale (IIS), which rates injury severity based on the degree of impairment in a range of daily activities and body functions.\(^{18}\) For upper extremity injuries such as those associated with table saws, injuries are categorized as minor, moderate, or serious.

In most injury data sets, the type of injury is indicated by a single code, typically based on the ICM-9 health condition classification system. In contrast, the NEISS incident reports include two separate codes for injury diagnosis and part of the body involved. However, because of the limited number of common injury types associated with operator contact with table saw blades, it is possible to compute tangible costs using the following simplifying assumptions:

1. The injury costs associated with amputations that result in hospitalization are estimated at the MAIS 3 (serious injury) level.
2. The costs for other types of injuries resulting in hospitalization and amputations that do not result in hospital admission are estimated using the MAIS 2 (moderate injury) estimates.
3. The costs for the remaining injury types that do not result in hospital admission are estimated at the MAIS 1 (minor injury) level.

We acknowledge that there are individual patients whose injuries may fairly be regarded as more serious than implied by the summary descriptor for the injury type and hospitalization status using this scale. However, it is also important to keep in mind that there are many types of MAIS 3-level injuries (e.g., spinal cord injuries) that might reasonably be considered as more impairing than all but the most serious injuries sustained while using table saws.

\(^{17}\) Edward Zaloshnja, Ted Miller, et al., “Crash Costs by Body Part Injured, Fracture Involvement, and Threat to Life Severity,” PIRE, 2004. This study presents injury cost component estimates in 2000 constant dollars, which we have updated as described in the text.
\(^{18}\) To account for the possibility of a person sustaining multiple injuries from a single accident, the IIS value for the most serious of the injuries incurred is denoted as the Maximum Abbreviated Injury Severity (MAIS) level. The MAIS is used in the NHTSA and other injury cost models to compute tangible and intangible injury costs.
The per-case tangible cost estimates used in the NHTSA study are as follows:

**Elements of Tangible ICM Costs (2000 dollars)**

<table>
<thead>
<tr>
<th>Cost Element</th>
<th>MAIS 1</th>
<th>MAIS 2</th>
<th>MAIS 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medical Treatment</td>
<td>$1,280</td>
<td>$5,575</td>
<td>$11,612</td>
</tr>
<tr>
<td>Emergency Services</td>
<td>97</td>
<td>212</td>
<td>368</td>
</tr>
<tr>
<td>Market Productivity</td>
<td>1,854</td>
<td>21,572</td>
<td>60,615</td>
</tr>
<tr>
<td>Household Productivity</td>
<td>566</td>
<td>7,192</td>
<td>17,950</td>
</tr>
<tr>
<td>Insurance Administration</td>
<td>686</td>
<td>4,566</td>
<td>14,302</td>
</tr>
<tr>
<td>Legal Costs</td>
<td>135</td>
<td>1,980</td>
<td>9,322</td>
</tr>
<tr>
<td><strong>Total Tangible Costs</strong></td>
<td><strong>4,618</strong></td>
<td><strong>41,097</strong></td>
<td><strong>114,169</strong></td>
</tr>
</tbody>
</table>

The CPSC ICM currently uses two price-level adjustments to translate the component cost estimates into current year (in this case, 2008) dollars. The CPSC approach inflates medical costs using the percentage change in the per-capita amount of medical care consumed; other costs are inflated using the percentage change in the total compensation index for private sector employment.\(^{19}\)

The impact of these price adjustments is substantial: translating the 2000 constant dollar costs reported in Zaloshnja et al. into 2008 dollars increases per-injury medical costs by 56 percent, while the employment and administrative costs are 30 percent higher in 2008 than in 2000. However, it is not clear that these specific price inflators are the most appropriate ones to use to update the tangible injury cost components of the ICM:

1. The estimated percent change in per-capita medical care consumption from 2000 to 2008 reflects not only the (comparatively large) annual increases in the prices of health care services, but also increased utilization of these services. It is not obvious that increased consumption of services is required to treat table saw blade contact (and other product-related) injuries. In our analysis, we use a more specific measure of the increase in the cost of medical services from the Consumer Price Index, which rose by 40 percent from 2000 to 2008.

2. The increase in total compensation may reflect the overall level of productivity associated with private sector employment, but it is not directly related to the data used to estimate market and household productivity in the CPSC ICM and other injury cost valuation models. These models estimate the costs associated with lost work days using wage rates, rather than overall measures of compensation. It therefore seems appropriate to use the change in real wage cost index (5 percent from 2000 to 2008) to update the productivity cost estimates.

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Using the Zaloshnja et al. (2004) estimates and these alternative price-level adjustment factors, the tangible costs associated with various types of medically attended table saw blade contact injuries are estimated at approximately $586 million in 2008 dollars.

**Tangible Costs of Table Saw Blade Contact Injuries (2008 dollars)**

<table>
<thead>
<tr>
<th>Injury Diagnosis</th>
<th>Non-Admitted</th>
<th>Hospital-Admitted</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Doctor or Clinic</td>
<td>ED</td>
</tr>
<tr>
<td>Amputation</td>
<td>$56,095,168</td>
<td>$100,268,761</td>
</tr>
<tr>
<td>Fracture</td>
<td>9,914,152</td>
<td>20,672,517</td>
</tr>
<tr>
<td>Laceration</td>
<td>24,717,264</td>
<td>118,163,659</td>
</tr>
<tr>
<td>Avulsion</td>
<td>13,504,400</td>
<td>17,133,572</td>
</tr>
<tr>
<td>Subtotal</td>
<td>104,230,984</td>
<td>256,238,509</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Based on these estimates, each medically attended blade contact injury results in an average of approximately $13,700 in tangible costs.

**Intangible Costs Associated with Table Saw Injuries**

Health and safety economists have long recognized that tangible costs (sometimes referred to collectively as “human capital costs”) do not provide a correct valuation of the true social costs associated with injuries. This is because the estimated expenditures do not account for the intangible losses incurred as a result of the injury—including but not limited to pain and suffering, reduced function, or restricted ability to perform daily activities.

These intangible costs are often estimated using the quality-adjusted-life-year (QALY) approach, which uses injury assessments and willingness-to-pay (WTP) studies to quantify the welfare trade-off between the quantity of life (longevity) and the quality of life. For each life year, perfect health is indicated by a QALY of 1.0, while death is consistent with a QALY value of 0.0. Certain types of debilitating or disfiguring injuries are estimated to reduce the remaining quality of life by more than death (i.e., have a reduction of more than 1.0 QALY per year of life).

While a large number of U.S. and foreign government agencies use this approach to value the intangible costs of injuries, the CPSC relies on direct dollar value estimates of pain and suffering and other intangibles based on a Miller et al. analysis of jury awards and settlements presented in the 2000 ICM documentation. The data used for this analysis are subject to question on many dimensions:

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20 Emergency services costs were updated to 2008 using the CPI-medical index. Health insurance and product liability litigation costs were updated using the total compensation index.

21 Certain types of debilitating or disfiguring injuries are estimated to reduce the remaining quality of life by more than death (i.e., have a reduction of more than 1.0 QALY per year of life).

22 Miller et al. also present a sensitivity analysis using a QALY-based approach. The development of the ICM intangible cost estimates is detailed in Chapter 8 of the CPSC ICM documentation prepared by Miller et al., 2000.
1. The cases included in the data reported by Jury Verdicts Research (JVR) represent a convenience sample that includes 1,154 awards and 781 settlement payments from a selected group of jurisdictions. These data cannot be used to develop national estimates of pain and suffering awards for all awards and settlements.  

2. Substantially more than half of the cases in the sample (1,158 of 1,986) are not actually product liability cases, but rather those that involved premises liability allegations, such as slip-and-fall cases. Moreover, 111 of the 828 “product liability” cases were incidents in which a bicyclist was involved in a motor vehicle accident, and another 43 cases involved moped accidents in which motor vehicles were also involved.

3. The average jury award or settlement in the 655 cases for which the authors could estimate pain and suffering damages was $625,000 (in 1995 dollars). The validity of extrapolating the results from this small set of very serious injury cases to the much larger universe of relatively less serious injuries is questionable at best.

Because of these concerns, we have adopted the more commonly used and broadly accepted QALY approach to value the intangible costs associated with various types of blade contact injuries incurred by table saw operators. Two alternative procedures were used to develop estimates of intangible costs:

1. First, per-injury QALY costs for upper extremity injuries are available from the Zaloshnja et al. (2004) crash cost study. These were updated from 2000 to 2008 dollar values using the change in the real wage cost index. This approach was used to generate the intangible cost estimates in our analysis.

2. Alternatively, estimates of the lifetime reductions in QALYs for each injury severity level are available from recent research conducted by Spicer and Miller for NHTSA. In our sensitivity analysis, these reductions are valued at $100,000 per QALY—the upper limit of the values suggested in a recent peer-reviewed journal article by two CPSC economists.

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23 It is likely that settlements were substantially underrepresented in this data set, because only a small fraction of product liability cases typically go to trial.


Using these two approaches, the estimated costs per quality-adjusted life year lost for minor, moderate, and severe injuries are as follows:

### Per-Injury Intangible Costs based on QALY Values (2008 dollars)

<table>
<thead>
<tr>
<th></th>
<th>MAIS 1</th>
<th>MAIS 2</th>
<th>MAIS 3</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Minor</td>
<td>Moderate</td>
<td>Serious</td>
</tr>
<tr>
<td><strong>Primary Analysis</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>QALY Cost (Zaloshnja et al.)</td>
<td>$3,949</td>
<td>$86,650</td>
<td>$172,387</td>
</tr>
<tr>
<td>QALY Cost (2008 dollars)</td>
<td>$4,146</td>
<td>$90,983</td>
<td>$181,006</td>
</tr>
<tr>
<td><strong>Ratio to Tangible Costs</strong></td>
<td>75%</td>
<td>194%</td>
<td>139%</td>
</tr>
<tr>
<td><strong>Sensitivity Analysis</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>QALY Reduction (Spicer-Miller)</td>
<td>0.06</td>
<td>0.85</td>
<td>1.77</td>
</tr>
<tr>
<td>Cost @$100k/QALY</td>
<td>$6,000</td>
<td>$85,000</td>
<td>$177,000</td>
</tr>
<tr>
<td><strong>Ratio to Tangible Costs</strong></td>
<td>108%</td>
<td>182%</td>
<td>136%</td>
</tr>
</tbody>
</table>

These two sets of estimates are very close, and both appear to be reasonably related to the tangible costs estimated for each of the three relevant MAIS levels that are relevant for valuing upper extremity injuries. Applying the valuations based on the Zaloshnja et al. approach to the estimates of medically attended table saw blade contact injuries yields the following estimates for intangible and total injury costs:

### Intangible and Total Injury Costs of Table Saw Blade Contact Injuries (2008 dollars)

<table>
<thead>
<tr>
<th>Injury Diagnosis</th>
<th>Non-Admitted</th>
<th>Hospital-Admitted</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Doctor or Clinic</td>
<td>ED</td>
</tr>
<tr>
<td>Amputation</td>
<td>$109,020,815</td>
<td>$194,872,080</td>
</tr>
<tr>
<td>Fracture</td>
<td>7,425,540</td>
<td>15,483,383</td>
</tr>
<tr>
<td>Laceration</td>
<td>18,512,834</td>
<td>88,502,683</td>
</tr>
<tr>
<td>Avulsion</td>
<td>10,114,579</td>
<td>12,832,771</td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td>145,073,768</td>
<td>311,690,916</td>
</tr>
<tr>
<td><strong>Intangible Costs</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL COSTS</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

This analysis indicates that the annual social cost of table saw injuries can be estimated at $1.39 billion, about 41 percent lower than the estimate presented in the CPSC ANPR. Using the alternative valuation based on the Spicer-Miller and Aiken-Zamula research provides a nearly identical estimate ($1.43 billion) of annual social costs.

Per-injury costs are estimated in our analysis at about $32,500, which is somewhat lower than the CPSC estimate of $35,000. It is important to keep in mind that the per-injury costs in our analysis are derived from a much smaller number of injuries that are more likely on average to be treated in hospital EDs and
to result in hospital admissions. Assuming (as must be the case) that the cases treated in hospital EDs are more serious on average than those treated in doctors’ offices or clinics, the per-injury cost estimate in our analysis is applicable to a smaller universe of injuries that is more heavily weighted to cases that require treatment in a hospital ED. Applying our injury valuation approach to the mix of cases estimated by CPSC would yield a social cost estimate of just under $30,000 per injury.

**Conclusions from the Analysis**

Our review and analysis shows that the CPSC estimates of the number of medically attended blade contact injuries and the aggregate social costs of these injuries are both significantly overstated. More specifically:

1. The methodology CPSC uses to extrapolate from ED-treated injuries to all medically attended injuries does not take into account the fact that table saw injuries are likely to be more serious and, thus, more likely to require treatment in a hospital ED than injuries involving fingers, wrists, hands, and lower arms that are associated with other consumer products. Our analysis indicates that there were approximately 42,800 medically attended injuries annually during 2007–2008, rather than the 67,000 estimated in the CPSC ANPR.

2. The approach CPSC uses to value the intangible costs of injuries is based on estimates from an unrepresentative sample of jury awards and settlements involving unrelated products, motor vehicles, and premises liability. Moreover, the inflators used to “roll-forward” older ICM model values to estimate 2008 dollar costs produce much higher unit cost estimates than if reasonable alternative methods were used to adjust for changes in prices and wages over time.

3. Our analysis indicates that the 2008 tangible and intangible social costs associated with table saw blade contact injuries were about $1.39 billion, less than 60 percent of the CPSC cost estimate of $2.36 billion. Per-injury costs are estimated in our analysis at about $32,500, which is somewhat lower than the CPSC estimate of $35,000. It is also important to keep in mind that the per-injury costs in our analysis are derived from a much smaller number of injuries which are more likely, on average, to be treated in hospital EDs and to result in hospital admissions. Applying our cost valuation model to the mix of injuries estimated in the CPSC special study yields an estimated per-injury cost of less than $30,000.
I. Background and Qualifications

I have been retained as an expert witness by counsel for the plaintiff, to express opinions on injury prevention, risk analysis, and benefit-cost analysis as these analytical tools relate to injuries caused by human contact with table saws. ¹ I am being paid $500 per hour for my work. I have previously served as an expert witness in the Ptak vs. Black and Decker case (No. 08-CV-6212).

I have devoted 30 years to the fields of risk analysis and benefit-cost analysis, with emphasis on applications to the need for injury prevention measures. I have published several books and over 100 peer-reviewed journal articles that cover both the theory and application of these analytical tools. In 1995, I served as elected President of the Society for Risk Analysis, an international membership organization of 2,000+ scientists and engineers dedicated to advancing the tools of risk analysis. In 2009, I was awarded the Society's highest honor, the Distinguished Achievement Award for a lifetime of accomplishment to the science of risk analysis.

My earliest work on injury prevention was in my doctoral dissertation at Carnegie-Mellon University (1983). Before airbags were installed in cars, I projected—based on theory, injury frequency, and experimental evidence—that the safety benefits of installing airbag systems in automobiles would exceed the costs of the systems. During this period, the major automobile manufacturers were generally opposing the widespread use of airbag technology. The results of my dissertation were published in the refereed literature and were ultimately cited by both the U.S. Department of Transportation and the U.S. Supreme Court. Ford Motor Company and Mercedes Benz subsequently changed their positions and decided to offer airbags. Due to pressures from consumers, litigation, and regulation, airbags are now standard equipment in all new cars and SUVs sold in the United States. Although my numerical projections from 1983 were not 100% accurate, real-world studies of airbags have confirmed that the safety benefits of airbags do exceed their costs. Most of the automobile manufacturers that opposed introduction of airbags into cars now support them as a successful injury prevention measure.

¹ In this report, "table saw" refers to benchtop, contractor, or cabinet saws. This is consistent with how the U.S. Consumer Product Safety Commission categorizes table saws.
Currently, I serve as Dean of the Indiana University School of Public and Environmental Affairs, one of the largest schools of public affairs in the United States. I previously led a team of policy analysts at the White House Office of Management and Budget (OMB) from 2001 to 2006. Our role at OMB was to apply the tools of risk analysis and benefit-cost analysis to a wide range of problems facing the federal government, from homeland security to consumer safety. Prior to my OMB experience, from 1985 to 2000, I served as tenured Professor of Policy and Decision Sciences at the Harvard School of Public Health. In addition to teaching these analytic tools at Harvard, I led both the Harvard Center for Risk Analysis and the Harvard Injury Control Center, where we advanced the tools and applied them to real-world problems in medicine and public health. A copy of my curriculum vitae is attached as Exhibit A.

Using my analytic training, experience, and publicly available data, I have performed a risk analysis and benefit-cost analysis of an automatic protection system to prevent debilitating hand injuries from table saws.

II. Report Overview

This report makes two basic points. First, both automatic ("passive") and manual ("active") approaches can be effective in reducing the frequency and severity of injuries. However, automatic measures are generally preferred because their effectiveness does not depend on the attentiveness or memories of the user. Automatic measures, by their design, protect the user even if the user is forgetful or careless. For example, the automobile airbag is an automatic protection system. Second, an automatic protection system to prevent hand injuries was invented for table saw applications ten years ago. SawStop™ was invented in 1999 and first produced in 2004. Although such a system has not yet been made standard equipment on table saws, it is likely to have safety benefits that are greater than the costs of the system. In particular, if an effective automatic system can be produced for less than $753 per saw, the economic savings from injury prevention will more than compensate for the cost of the more expensive table saw.

III. General Principles of Injury Prevention

An injury, as it is generally used, is “the transfer of one of the forms of physical energy (mechanical, chemical, thermal, etc.) in amounts or at rates that exceed the threshold of human tolerance” (Baker et al 1992). In the field of injury prevention, injuries are not viewed as accidents. Instead, they are treated as diseases, and like diseases, injuries have distinct patterns of how they occur. In order to study such patterns, the classic epidemiology triangle is used to assess the causes and distribution of injuries. See Figure 1.
**Figure 1: The Epidemiology Triangle**

The "host" is the person or population at risk of the injury. The "agent" is the physical energy that causes the injury. The "environment" is the place in which the host and agent interact.

In order to fully address the design and implementation of any injury prevention measure, one must understand the phases of injury prevention. In the pre-event (or primary) phase, the goal is to prevent the injury before the event occurs. In the event (or secondary) phase, the goal is to modify the consequences of the event in order to prevent or reduce the severity of an injury. Most prevention measures can be categorized at this phase (Pless and Hagel 2005). Last, post-event (or tertiary) prevention measures aim at reducing or eliminating long-term disabilities and impairments.

Combining the above-discussed concepts, Dr. William Haddon, Jr.—considered the founding father of injury prevention—developed the Haddon Matrix. See Figure 2.

**Figure 2: The Haddon Matrix**

<table>
<thead>
<tr>
<th>Phase</th>
<th>Host</th>
<th>Agent</th>
<th>Physical Environment</th>
<th>Social Environment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pre-Event</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Event</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Post-Event</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The matrix organizes prevention interventions according to the phase in time at which the intervention is attempted (i.e. pre-event, event, or post-event) and by the contributing factors that could be altered (i.e. host, agent, physical and social environment). By breaking down the injury event according to timing and contributing factors, the Haddon Matrix differentiates multiple points for intervention and is thus useful for identifying major modifiable factors that lead to injuries. Prior to Haddon's contributions, injury prevention was based on the assumption that changing users awareness of hazards—through information and education—was the primary method of preventing injuries. However, the psychological aspects of injury prevention are much more complex, and it cannot be assumed that information and education alone can induce behavioral changes to reduce injuries. Therefore, the choice of injury prevention strategies should focus on those strategies that will most effectively reduce the losses from injuries (Haddon and Baker 1981).
In general, protection measures can be “manual” or “automatic”. A manual approach requires individuals to take some form of action in protecting themselves (see Haddon and Goddard 1962; Haddon 1968; Baker and Haddon 1974; Gielen and Sleet 2003). In other words, a manual measure needs individual action for it to be effective. In contrast, an automatic approach relies on modifying the product or environment to make them safer for all individuals, irrespective of their behaviors (see Haddon and Goddard 1962; Haddon 1968; Baker and Haddon 1974; Gielen and Sleet 2003).

By way of illustration, seatbelts and airbags are both designed to reduce injury. However, while occupants are required to make an effort to use the seatbelts (manual), the airbags automatically protect them without requiring any action on their part (automatic). Similarly, both anchored, padded soccer goal posts and mouth guards are used in sports to prevent injuries. While the padded goal posts automatically provide protection for all players, only those players who wear mouth guards are protected. Tables 1 and 2 provide further examples of both injury prevention approaches.

In general, automatic strategies are preferred over manual ones because they provide protection without requiring individual action or cooperation. In addition, automatic approaches, such as airbags, have a more successful record than manual approaches, presumably because they minimize the need for human decision-making (Haddon 1974; Stone and Pearson 2009). Even though automatic measures do not require those they intend to protect to change their behaviors, such measures, nonetheless, provide constant protective effects (Christoffel and Gallagher 2006). For the above-stated reasons, “in situations where [an automatic] approach is feasible, available, and known to work well, professional, human, and responsible decision-making mandates its adoption” (Haddon 1974).

Table 1: Manual Protection

<table>
<thead>
<tr>
<th>Category</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Motor vehicle injury prevention</td>
<td>Seatbelts; driving under influence (DUI) checkpoints</td>
</tr>
<tr>
<td>Traffic safety</td>
<td>Ignition interlocks</td>
</tr>
<tr>
<td>Child protection</td>
<td>Bicycle helmets; child safety seats</td>
</tr>
<tr>
<td>Protection at home</td>
<td>Home pool watchers</td>
</tr>
<tr>
<td>Public health and safety</td>
<td>Boiling water; contraceptives</td>
</tr>
<tr>
<td>Sports injury prevention</td>
<td>Football helmets; mouth guards</td>
</tr>
</tbody>
</table>

Table 2: Automatic Protection

<table>
<thead>
<tr>
<th>Category</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Motor vehicle injury prevention</td>
<td>Airbags; padded dashboards; stability control systems</td>
</tr>
<tr>
<td>Traffic safety</td>
<td>Guard rails; breakaway sign posts</td>
</tr>
<tr>
<td>Child protection</td>
<td>Child-proof packaging; playgrounds with soft surfaces; pool fencing; child-resistant lighters; non-flammable child pajamas; narrow crib slats to prevent head entrapment</td>
</tr>
<tr>
<td>Protection at home</td>
<td>Anti-scald devices; automatic sprinklers attached to smoke detectors</td>
</tr>
<tr>
<td>Public health and safety</td>
<td>Clean public water supply; pasteurized milk; air ventilation systems</td>
</tr>
</tbody>
</table>

2 “Manual” and “automatic” approaches are also known as “active” and “passive” approaches, respectively.
<table>
<thead>
<tr>
<th>Sports injury prevention</th>
<th>Anchored, padded goal posts; breakaway bases</th>
</tr>
</thead>
<tbody>
<tr>
<td>Outdoor power equipment injury prevention</td>
<td>Over-ride switch for no-mow-in-reverse on riding mowers; blade brake clutch on push mowers</td>
</tr>
<tr>
<td>Other product injury prevention</td>
<td>Hair dryer electrocution prevention devices; fire-safe cigarettes</td>
</tr>
</tbody>
</table>

**IV. Application of Injury Prevention Principles to Table Saws**

In the area of table saws, safeguards exist to prevent various injuries resulting from improper use, lack of training and experience, inattention, or other factors. Many of them are standard equipments or are available as optional features on the saws. A wide variety of measures have been implemented or advocated to prevent or mitigate injuries incurred by users using table saws. The measures may be aimed at preventing human contact with the blade or preventing injuries during “kickback” events. Measures to prevent blade contact include:

- Blade guard: plastic covering over the blade which operators often remove
- Riving knife\(^3\): placed behind the blade and moves with it to maintain a constant radial distance from the blade
- Power feeder: relatively new technology that applies constant pressure without having to use one’s hands

Anti-kickback devices include:

- Splitter: sheet metal attached to the top of the table saw which prevents the wood from pinching or rotating in the blade
- Pawl: teeth that grab the wood in the event that it begins to reverse
- Riving knife: see above; this device also performs the same function as the splitter
- Featherboard: used to hold the wood against the rip fence

Although each of these measures has promise, none have been fully implemented or have proven to be fully effective in preventing injuries from table saws.

In this report, I examine the potential benefits and costs of a fully automatic safety system for table saws. In particular, an automatic system would protect the table saw user from injury from blade contact that would occur during ordinary use of the saw or during a kickback event.

For example, an automatic safety system called SawStop™ was demonstrated in 2000 and was offered for sale on a table saw in August of 2004. The SawStop™ safety system has two key components: a system that detects when human flesh has contacted the blade, and a system that stops the blade from spinning when human flesh has been detected. The detection system relies on the fact that human flesh, in contrast to wood, has a large inherent electrical capacitance and conductivity. A digital signal process is employed to continuously monitor the saw for human flesh contact with the blade. Once SawStop™ detects flesh, it stops the blade within five milliseconds. The rapid response is accomplished by a heavy-duty spring that pushes a brake pawl to stop the blade from spinning. Thus, almost simultaneously, the blade drops below the table and the motor turns off. Based on experimental evidence and real-world experience, it has been demonstrated

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\(^3\) European table saws have been sold with riving knives for many years. Prior to 2010, U.S. saws were not required to have riving knives. In 2010, standards applicable to saws sold in the U.S. were revised to require riving knives on all saws (Black & Decker 2010).
that the SawStop™ system can convert a severe injury to the hand (e.g. amputation of a finger) into a minor nick of the skin.

The SawStop™ system has won numerous awards since its invention, including TIME Magazine “Best New Inventions” (2006), Popular Mechanics “Breakthrough Awards” (2006), Fine Woodworking “Author’s Best Overall Choice” (2006), Workbench Magazine “Editor’s Choice Award of Quality” (2006), and Woodshop News “Reader’s Choice Award” (2005). In addition, it has also received a Product Safety Commendation from the U.S. Consumer Product Safety Commission (CPSC). Again, despite the promise that SawStop™ holds in preventing saw-related injuries, the industry has yet to implement this form of automatic protection.

As discussed earlier, injury prevention can occur at different phases. The aforementioned safeguards, including the SawStop™, are all event phase controls; they all aim to modify the consequences of table saw use in order to prevent an injury. The question of whether the safeguards can be considered to offer manual or automatic protection is slightly more difficult to answer. In reality, prevention strategies do not fall neatly into only two categories; rather, they range on a continuum between manual and automatic protection. In the table saw safety features continuum, most devices, except for the SawStop™, fall closer to the manual protection end. The manual safety features are often inconvenient. For example, the standard blade guards for the table saws do not come attached to the saws. After the saw is purchased, the user must manually install it. In addition, since the blade guards in widespread use may impede effective operation of the saw, users often do not use them. Consequently, even though table saws are sold with some safety features, they are often removed and not replaced. In contrast, an automatic safety feature is essentially invisible and does not interfere with the operation of machinery. Among the options, the SawStop™ system is the closest to a safety feature with true automatic protection: it does not obstruct the speed or ease of operation; it is practically invisible to the user; and, it cannot be easily removed by the user.4

While injury prevention specialists have a preference for automatic protection, the automatic feature needs to be analyzed for its economic costs and benefits. A benefit-cost analysis (BCA) can address the key question of whether the costs of an automatic safety system are greater or less than the costs of injuries that are prevented by the device. In order to prepare for such an analysis, the next section reviews the available literature on the frequency and costs of table saw injuries. The inputs for my BCA are either drawn—or adapted from—this literature.

It is important to note that this BCA does not differentiate between the categories of table saws (e.g. benchtop, contractor, or cabinet). In other words, because there is no evidence in the literature to suggest that the severity of the injury or the rate of injury associated with table saws differs depending on the category, I do not see the need to prepare separate analyses.

V. Frequency and Costs of Table Saw Injuries

There is no census each year in the United States that tallies the number of injuries from use of table saws. Some injuries are reported to manufacturers, a practice that is helpful in guiding design improvements. However, users have little incentive to report their injuries to manufacturers, and it

4 The SawStop™ system can be operated in “Bypass Mode” if electrically conductive materials need to be cut, and the user needs to prevent the brake from activating. However, in order to operate in Bypass Mode, the user must physically use the Bypass Key to override the system (SawStop™ 2009).
is likely that many do not do so. In the field of injury prevention, it is well known that the best evidence on the frequency of product-related injuries is found in specialized studies of medical records from emergency rooms (ERs), hospitals, and physician's offices. In this section, I review the literature on the frequency of saw-related injuries that arise from hand contact with the saw blades.

A. Frequency

Shields et al (2010) conducted a retrospective analysis of table saw injuries, using 1990-2007 data from the National Electronic Injury Surveillance System of the CPSC. The sample was 565,679 non-occupational table saw-related injuries treated in U.S. ERs between 1990 and 2007. On average, there were 31,426 such injuries per year. Overall, fingers and thumbs were the body parts that were injured most often (86%). The analysis found that 66% of the injuries were lacerations. Amputations accounted for 10% of the total number of injuries. Of the amputations, 33% involved only the tips, 28% were partial amputations, and 39% were complete amputations. The remaining injuries were due to avulsion, soft tissue damage, or other types of damage. This study emphasized the importance of implementing automatic (or passive) mechanisms to prevent blade contact injuries. More specifically, the authors discussed SawStop™ and highlighted its ability to prevent table saw-related injuries.

In their study of the economic impact of electric saw-related hand injuries, Hoxie et al (2009) divided the severity of non-occupational injuries into three groups. The study reviewed the records of 134 patients who came to the Mayo Clinic in Rochester, Minnesota. The first group included minor lacerations without nerve, vessel, or tendon injuries; these cases were treated in the ER or by primary care physicians. There were a total of 46 patients in this group. The second group had 29 patients and required amputation of at least one digit in an operating room, but does not call for microvascular or tendon repairs. The last group of patients required reimplantation/revascularization and surgical repair of digital arteries, digital nerves, or flexor tendons in an operating room. There were 59 patients in this group.

Cimek (2007) examined non-occupational ER visits and hospitalizations due to contact with hand tools or machineries (both powered and non-powered) in Ontario during the 2004-2005 fiscal year. There were 23,750 ER visits and 346 hospitalizations. Among the injuries, cuts to the hand, finger amputations, and finger or hand fractures were the most common ones sustained. Also, 42% of the ER visits and 71% of the hospitalizations were due to power tools.

In the United States, the number of ER-treated, non-occupational injuries associated with table saws averaged 29,000 per year between 1991 and 2000 (CPSC 2006). The trend stayed relatively stable during this period and into 2002. A special study resulted in more precise injury estimates for 2001 (38,000 injuries) and 2002 (38,980 injuries). Of the 38,000 total ER table saw injuries in 2001, approximately 34,000 were sustained by the operators. Of the operator injuries, around 28,300 involved blade contact. The majority of the non-blade contact injuries involved kickbacks. Furthermore, of the 28,300 ER-treated injuries, 65% involved lacerations, 15% involved amputations, and the remaining 20% involved fractures, avulsions, and crushings (CPSC 2006).

Children, as well as adults, suffer injuries from blade contact with table saws. A case series on hand trauma found that table saws caused 60% (nine out of fifteen students) of hand injuries suffered in shop class (Beavis and Classen 2006). Out of those students, five sustained lacerations and four

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5 CPSC does not collect data on occupational table saw injuries (see Shields et al 2010).
sustained amputations. Furthermore, a study that examined the characteristics of children with traumatic amputations and associated products found that children with amputations related to power saws were 2.93 times more likely to be hospitalized than those with amputations associated with other products, such as doors and lawnmowers (Hostetler et al 2005). The authors also found that 77.3% of power saw-related amputations were complete, compared with 60.4% of amputations associated with all other products combined. However, this difference was not statistically significant. Knight et al (2000) sought to describe the epidemiology of shop class injuries (14,133) in Utah public schools between 1992 and 1996. The authors divided the involvement of the injuries into those involving equipment use and those involving non-equipment use. They found that 88.4% of the injuries were equipment-related. For those injuries, 11.6% involved table saws. In addition, table saws were involved in 15% of the shop injuries admitted to the ER. Of the 1,008 students injured in shop class, seven needed some form of in-patient hospital care. Six of these students were injured using table saws: two suffered injuries involving a tendon; three sustained finger amputations; and, one sustained open fracture with nerve and tendon damage.

Conn et al studied national estimates of non-occupational finger amputations in United States ERs (2005). For children 14 years or younger, fingers injured in doorways accounted for a high percentage of the amputations (compared to fingers injured by power tools and other products). In contrast, power tool-related finger amputations (including power saws, lawnmowers, and other powered yard tools) were most common for those 15 years or older. For example, whereas almost 75% of finger amputations for those between ages 0 and 4 were associated with doors, roughly half of finger amputations for those 55 and older were associated with power tools. Among the older groups (15 years or older), the authors found that improper use of safeguards on power tools may be significant. A survey of those who use woodworking tools reported that table saws cause 39% of the amputations. In addition, the survey identified failure to use properly installed safeguards as a major causal factor of finger amputations.

Marcy et al (2003) examined a group of power tools and workshop equipment and the associated maximum addressable non-occupational injuries between 1997 and 2002. One of the categories included bench or table saws. Half of the power saw-related injuries in the United States involved bench or table saws. For this category, the report estimated that there were 31,884 ER-treated injuries and 64,651 all medically-treated injuries.

In an analysis of the causes and consequences of hand injuries, the Trybus et al (2005) study included 1,199 patients treated for hand injuries (both occupational and non-occupational) in a Polish hospital between 1987 and 2000. The causes of hand trauma were: machine, cut, fall, and crush. The severity of the injuries was divided into four levels. The study found that the most severe hand injuries (i.e. Level IV) occurred mostly during the operation of mechanical machinery. In particular, circular saws caused 18% of all hand injuries.

Becker et al (1996) surveyed 283 amateur and professional woodworkers in New Mexico to determine the histories and rates of woodworking tool-related injuries. They found that among injuries caused by power tools, the table saw was most frequently identified as one that was associated with injuries (20.8%), although the jointer-planer was associated with the highest rate of injuries (incidence per 1,000 person-hours). Also, respondents reported the highest proportion of serious injuries associated with the use of table saws (20.7% of all serious injuries reported).
After reviewing these studies, I have determined that the most suitable figures to use for the BCA are from the 2006 CPSC report. While the other studies contribute to our understanding of saw-related injuries, only the CPSC report directly and specifically addresses the frequency of table saw injuries.

B. Economic costs

The total costs of table saw injuries include four components: medical and rehabilitation costs, lost wages and productivity, legal system costs, and pain and suffering. The CPSC study, which is discussed below, is the only study to include estimates of all four components of costs.

Since the severity of injuries varies greatly, the economic costs of these injuries also vary greatly. For example, the medical costs of several stitches to the finger may be less than $1,000 while the medical costs of re-attaching an amputated finger may exceed $10,000. Recognizing that a small fraction of the injuries have the highest severity and costs, we seek an estimate of the average cost of table saw injuries, where the average is influenced by the relative frequency of mild and severe injuries.

Hoxie et al (2009) analyzed lost wages and medical expenses for electric saw-related hand injuries. In the first group (i.e. minor injuries, see above), the mean estimated lost wages were $2,731 and the mean medical costs were $2,906. The total cost for all patients was $259,340. For patients that required amputations, the mean estimated lost wages were $6,790 and the mean medical costs were $15,816. The total cost for the group was $666,311. For the group with the most severe injuries, the mean wage loss of $14,220 and mean medical costs of $40,121. The total cost of injuries was $3,186,370 for all patients in this group.

In his article, Dr. John A. Miyano, a hand surgeon who is also a woodworker, provided his perspectives on table saw use (2007/2008). A simple fingertip cut requiring stitches treated in an ER would cost between $500 and $1,000. A cut finger nerve, for which the treatment would include an ER visit and subsequent surgery, would cost between $1,500 and $3,000. Further, a cut flexor tendon (which would also require an ER visit and surgery), would cost between $3,000 and $5,000. In the most severe case in which the amputated finger would require re-attachment, the medical cost would be $10,000 and higher. The author acknowledged that the real economic costs of table saw injuries, which would include lost wages and pain and suffering, are far greater than medical bills alone. However, he did not provide estimates for these figures.

Using the Injury Cost Model (ICM), the CPSC estimated the costs associated with table saw injuries (2006). The ICM estimates comprised four parts: medical costs, lost wages, pain and suffering, and product liability insurance administration and litigation costs. From the 28,300 ER-treated injuries involving blade contact (discussed above), the ICM estimated that there was a total of 55,300 all medically-treated blade injuries, as some are treated outside the ER (e.g. at a health clinic or a physician’s office). According to the CPSC, the approximate contributions of each of the components to the total table saw injury costs are as follow: medical costs, 5.5%, lost wages, 14.0%, pain and suffering, 80%, and legal and liability, less than 1%.6

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While Rosberg et al. (2005) did not specifically address saw-related injuries in their study, they examined the costs of hand and forearm injuries in Sweden. The measures of cost were: medical costs, costs from lost production, and total costs (the sum of the medical and lost production costs). The study population was 140 patients. The categories of injury were: minor (e.g. laceration), moderate (e.g. tendon injury), severe (e.g. fracture), and major (e.g. amputation). Overall, 75% of the minor injuries had medical costs that were less than €2,500 (about $3,750 at €1 = $1.50), although 25% had lost production costs over €11,500 (about $17,250). The median total cost for major injuries was over 10 times higher than the cost for minor injuries. Also, the regression analysis showed that a one unit increase in injury severity was associated with 2% higher medical costs and 1% higher lost production costs.

In the Marcy et al. (2003) report, injury costs from bench or table saws were estimated. Among all the tools and equipments included, bench or table saws ranked first on maximum addressable costs, and third on total costs.\(^7\)

In the Knight et al. (2000) study, six out of the seven injuries involved table saws (and the remaining one was attributable to automotive cleaning fluid). The total in-patient hospital charges for these injuries (not excluding the non-table-saw injury) were $26,767, with an average charge of $3,821.

Among the studies, the 2006 CPSC report provides the most relevant and detailed figures for the total economic cost of table saw injuries. Accordingly, I use its figures for the economic cost of table saw injuries in the United States in the following BCA.

### VI. Benefit-Cost Analysis of Automatic Protection

The studies discussed above provide inputs to the BCA, which, in turn, informs my expert judgment on the potential economic benefits of an automatic safety system for table saws.

#### A. The "switchpoint cost" of an automatic safety protection

The "switchpoint cost" refers to the maximum cost increase in a typical table saw that can be justified by a BCA of an automatic safety system. If a safety system costs more than the switchpoint value, the safety system is too expensive. If the safety system costs less than the switchpoint value, the benefits of the system outweigh the costs.

The inputs for the BCA are described in Table 3.

#### Table 3: Description of Input Variables

<table>
<thead>
<tr>
<th>Inputs</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lifespan of the saw</td>
<td>This is the expected useful life of a table saw currently used in the U.S., which is between 5 and 15 years.</td>
</tr>
<tr>
<td>Injury incidence</td>
<td>This refers to an injury related to table saw use of sufficient severity that the operator seeks medical attention.</td>
</tr>
</tbody>
</table>

\(^7\) There are costs of injuries which are "incidental and not addressable by mandatory or voluntary standards or by other action which the CPSC could take" (Marcy et al. 2003). "Maximum addressable costs", therefore, refer to costs associated with injuries which remain.
Number of saws in use | The product population ranges between 6 and 10 million, existing and new units.
--- | ---
Average rate of injury | Average rate of injury = injury incidence/number of saws
Average cost of injury | This includes some or all of the following costs associated with table saw injuries: medical costs, lost wages, pain and suffering, and legal/liability fees. The Consumer Price Index (CPI) is used to adjust for the purchasing power of the dollar.\(^8\)
Discount rate | A rate used to compute the present value of costs or savings that occur in future years.
Effectiveness | The rate at which the automatic safety system is effective at reducing the costs of injuries.

B. Cost of new technology

1. Base case analysis: medium inputs

In the base case analysis, I use medium inputs. See Table 4.

**Table 4: Medium Inputs**

<table>
<thead>
<tr>
<th>Inputs</th>
<th>Medium</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lifespan of the saw</td>
<td>10 years</td>
<td>The expected product life is between 5 and 15 years (CPSC 2006).</td>
</tr>
<tr>
<td>Injury incidence</td>
<td>28,300</td>
<td>The number of ER-treated blade injuries per year (CPSC 2006).</td>
</tr>
<tr>
<td>Number of saws in use</td>
<td>8 million</td>
<td>The table saw population is in the range of 6 to 10 million units (CPSC 2006).</td>
</tr>
<tr>
<td>Average rate of injury</td>
<td>0.0035375</td>
<td>Average rate of injury = injury incidence/number of saws</td>
</tr>
<tr>
<td>Average cost of injury</td>
<td>$27,730</td>
<td>Medical costs = $2,118 (adjusted, $2,563); lost wages = $5,392 (adjusted, $6,524); pain &amp; suffering = $15,407(^9) (adjusted, $18,643; CPSC 2006). Total = $22,917 (\rightarrow) adjusted for purchasing power of the dollar (x 1.21) (\rightarrow) $27,730</td>
</tr>
<tr>
<td>Discount rate</td>
<td>3%</td>
<td>0%, 3%, 7% (OMB 2003).</td>
</tr>
<tr>
<td>Effectiveness</td>
<td>90%</td>
<td>80%, 90%, or 100% effective in injury prevention (Gass 2009).</td>
</tr>
</tbody>
</table>

The effectiveness of the automatic safety system, which is assumed to be 80% to 100%, is defined with respect to the cost of injuries. It is based on expert testimony that the SawStop™ system will prevent injury in the vast majority of cases (Gass 2009). There will, however, be some cases in which stitches and other medical treatment are still required. There may also be unusual cases of manufacturing defect or unusual cases in which the operator’s hand moves into the blade at a velocity that is so rapid that the technology does not prevent serious injury.

\(^8\) 2009 CPI/2001 CPI \(\rightarrow\) 214.54/177.10 = 1.21.

\(^9\) This figure is one-half of the CPSC’s estimate for pain and suffering, which is $30,814.
With these inputs, the switchpoint cost is $753. In other words, an average table saw, if equipped with an automatic safety system, is expected to generate $753 in economic benefits from reduced injury (expressed in present value), compared to the same saw without the automatic safety system. See Appendix I for calculations.

2. Sensitivity analysis of the switchpoint cost value

Table 5 provides a sensitivity analysis of the switchpoint cost value, assuming permutations of different input values. Within each permutation in the sensitivity analysis, the input value is changed from its medium value while the remaining inputs take on the medium values in Table 4.

The permutations for injury incidence in the sensitivity analysis are 16,000 and 55,300. The first is CPSC’s figure for non-kickback blade injuries treated in ERs and the second is CPSC’s figure for the number of all medically-treated blade injuries (2006). The permutations for cost of injury are $9,087 and $46,606. These figures are derived from CPSC-provided information. Adjusted for the purchasing power of the dollar, the smaller figure comprises $2,563 for medical costs and $6,524 for lost wages; the larger figure includes the same numbers for medical costs and lost wages, plus $37,285 for pain and suffering and $234 for legal and liability fees. See Appendix II for calculations.

Table 5: Input Values for Sensitivity Analysis

<table>
<thead>
<tr>
<th>Input</th>
<th>Permutation</th>
<th>Switchpoint Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lifespan of the saw</td>
<td>5 years</td>
<td>$404</td>
</tr>
<tr>
<td></td>
<td>15 years</td>
<td>$1,054</td>
</tr>
<tr>
<td>Injury incidence</td>
<td>16,000</td>
<td>$426</td>
</tr>
<tr>
<td></td>
<td>55,300</td>
<td>$1,472</td>
</tr>
<tr>
<td>Number of saws in use</td>
<td>6 million</td>
<td>$1,004</td>
</tr>
<tr>
<td></td>
<td>10 million</td>
<td>$603</td>
</tr>
<tr>
<td>Average cost of injury</td>
<td>$7,510</td>
<td>$247</td>
</tr>
<tr>
<td></td>
<td>$38,517</td>
<td>$1,266</td>
</tr>
<tr>
<td>Discount rate</td>
<td>0%</td>
<td>$883</td>
</tr>
<tr>
<td></td>
<td>7%</td>
<td>$620</td>
</tr>
<tr>
<td>Effectiveness</td>
<td>80%</td>
<td>$669</td>
</tr>
<tr>
<td></td>
<td>100%</td>
<td>$837</td>
</tr>
<tr>
<td>Average cost of injury, injury</td>
<td>$38,517, 16,000</td>
<td>$716</td>
</tr>
<tr>
<td>incidence</td>
<td>$7,510, 55,300</td>
<td>$482</td>
</tr>
</tbody>
</table>

3. Sensitivity analysis with CPSC figures

The CPSC figure for all medically-treated table saw blade injuries is 55,300. Without pain/suffering and legal/liability costs, the CPSC estimates the cost of injury to be $7,510. With these two categories, the cost of injury is $38,517. Table 6 provides a sensitivity analysis of switchpoint

---

10 These figures are adjusted for the purchasing power of the dollar. $7,510 x 1.21 = $9,087; $38,517 x 1.21 = $46,606.
11 Above, note 6.
values with the CPSC figures. Within the permutations, unless otherwise stated, the remaining inputs take on medium figures from Table 4. See Appendix III for calculations.

Table 6: Sensitivity Analysis with CPSC Inputs

<table>
<thead>
<tr>
<th>Input</th>
<th>Permutations</th>
<th>Switchpoint Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Average cost of injury</td>
<td>$7,510</td>
<td>$482</td>
</tr>
<tr>
<td></td>
<td>$38,517</td>
<td>$2,473</td>
</tr>
<tr>
<td>Average cost of injury, lifespan of the saw</td>
<td>$7,510, 5 years</td>
<td>$259</td>
</tr>
<tr>
<td></td>
<td>$38,517, 5 years</td>
<td>$1,328</td>
</tr>
<tr>
<td></td>
<td>$7,510, 15 years</td>
<td>$675</td>
</tr>
<tr>
<td></td>
<td>$38,517, 15 years</td>
<td>$3,461</td>
</tr>
<tr>
<td>Average cost of injury, number of saws in use</td>
<td>$7,510, 6 million</td>
<td>$643</td>
</tr>
<tr>
<td></td>
<td>$38,517, 6 million</td>
<td>$3,298</td>
</tr>
<tr>
<td></td>
<td>$7,510, 10 million</td>
<td>$386</td>
</tr>
<tr>
<td></td>
<td>$38,517, 10 million</td>
<td>$1,979</td>
</tr>
<tr>
<td>Average cost of injury, discount rate</td>
<td>$7,510, 0%</td>
<td>$565</td>
</tr>
<tr>
<td></td>
<td>$38,517, 0%</td>
<td>$2,900</td>
</tr>
<tr>
<td></td>
<td>$7,510, 7%</td>
<td>$397</td>
</tr>
<tr>
<td></td>
<td>$38,517, 7%</td>
<td>$2,037</td>
</tr>
<tr>
<td>Average cost of injury, effectiveness</td>
<td>$7,510, 80%</td>
<td>$429</td>
</tr>
<tr>
<td></td>
<td>$38,517, 80%</td>
<td>$2,199</td>
</tr>
<tr>
<td></td>
<td>$7,510, 100%</td>
<td>$536</td>
</tr>
<tr>
<td></td>
<td>$38,517, 100%</td>
<td>$2,748</td>
</tr>
</tbody>
</table>

C. Cost of redesign

The addition of a safety system on table saws would entail some one-time testing and retooling costs. For instance, the Power Tool Institute (PTI) estimates that the costs for testing, retooling, and redesigning the saws can range between $2 and $10 million per company. Using its cost estimates (i.e. $2 to $10 million, 10-year lifespan), the cost of testing, retooling, and redesigning would be between $1.93 and $9.66 per saw.\(^{12}\)

D. Cost of replacement

The expected cost of replacement over the lifespan of the table saw is similarly small. Assuming the medium inputs from above, a 3% discount rate, and the cost of replacing blade and brake cartridge is $200 ($100 for each component), the expected replacement cost is $7.03. See Appendix IV for calculations.

From this analysis in sections C and D (above), it is clear that the total cost of a new automatic safety system, such as the SawStop™ system, comprises primarily the cost of the new equipment added to the saw. In comparison, the costs of redesign and replacement are relatively insignificant.

\(^{12}\) At $2 million per manufacturer: $14,000,000/725,000 over ten years = $1.93. At $10 million per manufacturer: $70,000,000/725,000 over ten years = $9.66.
VII. Conclusion

With the medium inputs, the switchpoint cost is $753 per unit, and after deducting the redesign and replacement costs, the figure is $736 per unit. In other words, under these assumptions, the extra cost for automatic protection that would be justified by injury prevention benefits is $736 per unit. Furthermore, my analysis shows that under no permutation of input values is the switchpoint cost less than $230. By way of comparison, the estimated cost of the SawStop™ system, assuming widespread use, is believed to be about $100 to $150. Therefore, in my expert opinion, the economic case for instituting automatic protection in table saws is strong.

References


13 $753 (medium inputs) - $10 (cost of redesign) - $7 (cost of replacement) = $736.
14 $247 (medium inputs, average cost of injury = $7,510) - $10 (cost of redesign) - $7 (cost of replacement) = $230.


### APPENDIX I

#### Medium Inputs

<table>
<thead>
<tr>
<th>Year</th>
<th>Injury Incidence</th>
<th># of saws</th>
<th>Average rate of injury</th>
<th>Average cost (medical + lost wages + 1/2 pain/suffering)</th>
<th>3% discount rate</th>
<th>Effectiveness</th>
<th>Expected injury cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>28300</td>
<td>8000000</td>
<td>0.0035375</td>
<td>$27,729.57</td>
<td>0.970873786</td>
<td>0.9</td>
<td>$85.71</td>
</tr>
<tr>
<td>2</td>
<td>28300</td>
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<td>0.0035375</td>
<td>$27,729.57</td>
<td>0.942595909</td>
<td>0.9</td>
<td>$83.22</td>
</tr>
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<td>28300</td>
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<td>$80.79</td>
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<tr>
<td>4</td>
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<td>$76.15</td>
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<tr>
<td>6</td>
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<td>0.0035375</td>
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<td>0.837484257</td>
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<td>$73.94</td>
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<td>$71.78</td>
</tr>
<tr>
<td>8</td>
<td>28300</td>
<td>8000000</td>
<td>0.0035375</td>
<td>$27,729.57</td>
<td>0.789409234</td>
<td>0.9</td>
<td>$69.69</td>
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<tr>
<td>9</td>
<td>28300</td>
<td>8000000</td>
<td>0.0035375</td>
<td>$27,729.57</td>
<td>0.766416732</td>
<td>0.9</td>
<td>$67.66</td>
</tr>
<tr>
<td>10</td>
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<td>$65.69</td>
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</tbody>
</table>

**Switchpoint Cost:** $753.08
APPENDIX II

Sensitivity Analysis

Medium Inputs, Except Lifespan of Saw = 5 Years

<table>
<thead>
<tr>
<th>Year</th>
<th>Injury Incidence</th>
<th># of saws</th>
<th>Average rate of injury</th>
<th>Average cost (medical + lost wages + 1/2 pain/suffering)</th>
<th>3% discount rate</th>
<th>Effectiveness</th>
<th>Expected injury cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>28300</td>
<td>8000000</td>
<td>0.0035375</td>
<td>$27,729.57</td>
<td>0.970873786</td>
<td>0.9</td>
<td>$85.71</td>
</tr>
<tr>
<td>2</td>
<td>28300</td>
<td>8000000</td>
<td>0.0035375</td>
<td>$27,729.57</td>
<td>0.942595909</td>
<td>0.9</td>
<td>$83.22</td>
</tr>
<tr>
<td>3</td>
<td>28300</td>
<td>8000000</td>
<td>0.0035375</td>
<td>$27,729.57</td>
<td>0.915141659</td>
<td>0.9</td>
<td>$80.79</td>
</tr>
<tr>
<td>4</td>
<td>28300</td>
<td>8000000</td>
<td>0.0035375</td>
<td>$27,729.57</td>
<td>0.888487048</td>
<td>0.9</td>
<td>$78.44</td>
</tr>
<tr>
<td>5</td>
<td>28300</td>
<td>8000000</td>
<td>0.0035375</td>
<td>$27,729.57</td>
<td>0.862608784</td>
<td>0.9</td>
<td>$76.15</td>
</tr>
</tbody>
</table>

Switchpoint Cost: $404.31

APPENDIX II (continued)
### Medium Inputs, Except Lifespan of Saw = 15 Years

<table>
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<th>Year</th>
<th>Injury Incidence</th>
<th># of saws</th>
<th>Average rate of injury</th>
<th>Average cost (medical + lost wages + 1/2 pain/suffering)</th>
<th>3% discount rate</th>
<th>Effectiveness</th>
<th>Expected injury cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>28300</td>
<td>8000000</td>
<td>0.0035375</td>
<td>$27,729.57</td>
<td>0.970873786</td>
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<td>$85.71</td>
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<td>28300</td>
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</tr>
<tr>
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</table>

**Switchpoint Cost:** $1,053.93

APPENDIX II (continued)
Medium Inputs, Except Injury Incidence = 16,000

<table>
<thead>
<tr>
<th>Year</th>
<th>Injury Incidence</th>
<th># of saws</th>
<th>Average rate of injury</th>
<th>Average cost (medical + lost wages + 1/2 pain/suffering)</th>
<th>3% discount rate</th>
<th>Effectiveness</th>
<th>Expected injury cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>16000</td>
<td>8000000</td>
<td>0.002</td>
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</tr>
<tr>
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</tr>
<tr>
<td>10</td>
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<td>8000000</td>
<td>0.002</td>
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<td>0.9</td>
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</table>

Switchpoint Cost: $425.77
APPENDIX II (continued)

Medium Inputs, Except Injury Incidence = 55,300

<table>
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<th>Year</th>
<th>Injury Incidence</th>
<th># of saws</th>
<th>Average rate of injury</th>
<th>Average cost (medical + lost wages + 1/2 pain/suffering)</th>
<th>3% discount rate</th>
<th>Effectiveness</th>
<th>Expected injury cost</th>
</tr>
</thead>
<tbody>
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Switchpoint Cost: $1,471.57
### APPENDIX II (continued)

**Medium Inputs, Except Number of Saws in Use = 6 Million**

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<th># of saws</th>
<th>Average rate of injury</th>
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<th>3% discount rate</th>
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<th>Expected injury cost</th>
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**Switchpoint Cost:** $1,004.11
Medium Inputs, Except Number of Saws in Use = 10 Million

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<th>Average cost (medical + lost wages + 1/2 pain/suffering)</th>
<th>3% discount rate</th>
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Switchpoint Cost: $602.46
Medium Inputs, Except Cost of Injury = $9,087

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<th># of saws</th>
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<th>Effectiveness</th>
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Switchpoint Cost: $246.79

APPENDIX II (continued)

Medium Inputs, Except Cost of Injury = $46,606
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<th>Average rate of injury</th>
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<th>3% discount rate</th>
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Switchpoint Cost: $1,265.72

APPENDIX II (continued)

Medium Inputs, Except Discount Rate = 0%
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<th>Effectiveness</th>
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Switchpoint Cost: $882.84

APPENDIX II (continued)

Medium Inputs, Except Discount Rate = 7%
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Switchpoint Cost: $620.07

APPENDIX II (continued)

Medium Inputs, Except Effectiveness = 80%
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</tr>
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</tr>
<tr>
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<tr>
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**Switchpoint Cost:** $669.40

### APPENDIX II (continued)

Medium Inputs, Except Effectiveness = 100%
<table>
<thead>
<tr>
<th>Year</th>
<th>Injury Incidence</th>
<th># of saws</th>
<th>Average rate of injury</th>
<th>Average cost (medical + lost wages + 1/2 pain/suffering)</th>
<th>3% discount rate</th>
<th>Effectiveness</th>
<th>Expected injury cost</th>
</tr>
</thead>
<tbody>
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<td>8000000</td>
<td>0.0035375</td>
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<tr>
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Switchpoint Cost: $836.76

APPENDIX II (continued)

Medium Inputs, Average Cost of Injury = $46,606, Injury Incidence = 16,000
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<th>Year</th>
<th>Injury Incidence</th>
<th># of saws</th>
<th>Average Rate of injury</th>
<th>Average Cost (medical + lost wages + pain/suffering + legal/liability)</th>
<th>Effectiveness</th>
<th>3% discount rate</th>
<th>Expected injury cost</th>
</tr>
</thead>
<tbody>
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<td>1</td>
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<td>$81.45</td>
</tr>
<tr>
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<td>16000</td>
<td>800000</td>
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</tr>
<tr>
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<td>0.915142</td>
<td>$76.77</td>
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<tr>
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Switchpoint Cost: $715.60

APPENDIX II (continued)

Medium Inputs, Average Cost of Injury = $9,087, Injury Incidence = 55,300
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<thead>
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<th>Year</th>
<th>Injury Incidence</th>
<th># of saws</th>
<th>Average Rate of injury</th>
<th>Average Cost (medical + lost wages)</th>
<th>Effectiveness</th>
<th>3% discount rate</th>
<th>Expected injury cost</th>
</tr>
</thead>
<tbody>
<tr>
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<td>0.006913</td>
<td>$9,087.10</td>
<td>0.9</td>
<td>0.970874</td>
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</tr>
<tr>
<td>2</td>
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</tr>
<tr>
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<td>55300</td>
<td>8000000</td>
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</tr>
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<td>0.862609</td>
<td>$48.77</td>
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<td>6</td>
<td>55300</td>
<td>8000000</td>
<td>0.006913</td>
<td>$9,087.10</td>
<td>0.9</td>
<td>0.837484</td>
<td>$47.35</td>
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<tr>
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<td>$9,087.10</td>
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</tr>
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<td>8000000</td>
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<td>0.744094</td>
<td>$42.07</td>
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</table>

Switchpoint Cost: $482.24

APPENDIX III
Sensitivity Analysis with CPSC Inputs
- "Small" cost figure = $9,087.10 (medical- $2,562.78; lost wages- $6,524.32)
- "Large" cost figure = $46,605.57 (medical- $2,562.78; lost wages- $6,524.32; pain/suffering- $37,284.94; legal/liability- $233.53)

CPSC Inputs, Lifespan of Saw = 10 years

<table>
<thead>
<tr>
<th>Year</th>
<th>Injury Incidence</th>
<th># of saws</th>
<th>Average rate of injury</th>
<th>&quot;Small&quot; cost figure</th>
<th>Effectiveness</th>
<th>3% discount rate</th>
<th>&quot;Small&quot; expected injury cost</th>
<th>&quot;Large&quot; cost figure</th>
<th>&quot;Large&quot; expected injury cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
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<td>$9,087.10</td>
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<td>0.970874</td>
<td>$54.89</td>
<td>$46,605.57</td>
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</tr>
<tr>
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<td>0.0069125</td>
<td>$9,087.10</td>
<td>0.9</td>
<td>0.942596</td>
<td>$53.29</td>
<td>$46,605.57</td>
<td>$273.30</td>
</tr>
<tr>
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<td>0.0069125</td>
<td>$9,087.10</td>
<td>0.9</td>
<td>0.915142</td>
<td>$51.74</td>
<td>$46,605.57</td>
<td>$265.34</td>
</tr>
<tr>
<td>4</td>
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<td>800000</td>
<td>0.0069125</td>
<td>$9,087.10</td>
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<td>0.888487</td>
<td>$50.23</td>
<td>$46,605.57</td>
<td>$257.61</td>
</tr>
<tr>
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<td>0.862609</td>
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<td>$46,605.57</td>
<td>$250.11</td>
</tr>
<tr>
<td>6</td>
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<td>0.0069125</td>
<td>$9,087.10</td>
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<td>0.837484</td>
<td>$47.35</td>
<td>$46,605.57</td>
<td>$242.82</td>
</tr>
<tr>
<td>7</td>
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<td>$9,087.10</td>
<td>0.9</td>
<td>0.813092</td>
<td>$45.97</td>
<td>$46,605.57</td>
<td>$235.75</td>
</tr>
<tr>
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<td>0.0069125</td>
<td>$9,087.10</td>
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<td>$222.22</td>
</tr>
<tr>
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</table>

Switchpoint Costs: $482.24 $2,473.29

APPENDIX III (continued)

CPSC Inputs, Lifespan of Saw = 5 years
<table>
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<tr>
<th>Year</th>
<th>Injury Incidence</th>
<th># of saws</th>
<th>Average rate of injury</th>
<th>&quot;Small&quot; cost figure</th>
<th>Effectiveness</th>
<th>3% discount rate</th>
<th>&quot;Small&quot; expected injury cost</th>
<th>&quot;Large&quot; cost figure</th>
<th>&quot;Large&quot; expected injury cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>55300</td>
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<td>0.970874</td>
<td>$54.89</td>
<td>$46,605.57</td>
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<td>0.942596</td>
<td>$53.29</td>
<td>$46,605.57</td>
<td>$273.30</td>
</tr>
<tr>
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<td>0.915142</td>
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</tr>
<tr>
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<td>$9,087.10</td>
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<td>$50.23</td>
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</table>

Switchpoint Costs: $258.91 $1,327.86

APPENDIX III (continued)

CPSC Inputs, Lifespan of Saw = 15 years
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<th># of saws</th>
<th>Average rate of injury</th>
<th>&quot;Small&quot; cost figure</th>
<th>Effectiveness</th>
<th>3% discount rate</th>
<th>&quot;Small&quot; expected injury cost</th>
<th>&quot;Large&quot; cost figure</th>
<th>&quot;Large&quot; expected injury cost</th>
</tr>
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<td>1</td>
<td>55300</td>
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<td>0.970874</td>
<td>$54.89</td>
<td>$46,605.57</td>
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<tr>
<td>2</td>
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<td>$9,087.10</td>
<td>0.9</td>
<td>0.942596</td>
<td>$53.29</td>
<td>$46,605.57</td>
<td>$273.30</td>
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<tr>
<td>3</td>
<td>55300</td>
<td>8000000</td>
<td>0.0069125</td>
<td>$9,087.10</td>
<td>0.9</td>
<td>0.915142</td>
<td>$51.74</td>
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<td>$265.34</td>
</tr>
<tr>
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<td>$9,087.10</td>
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<td>0.888487</td>
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<tr>
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<td>$43.33</td>
<td>$46,605.57</td>
<td>$222.22</td>
</tr>
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**Switchpoint Costs:**  
$674.89  
$3,461.34  

**APPENDIX III (continued)**  

**CPSC Inputs, Number of Saws in Use = 6 Million**
<table>
<thead>
<tr>
<th>Year</th>
<th>Injury Incidence</th>
<th># of saws</th>
<th>Average rate of injury</th>
<th>&quot;Small&quot; cost figure</th>
<th>Effectiveness</th>
<th>3% discount rate</th>
<th>&quot;Small&quot; expected injury cost</th>
<th>&quot;Large&quot; cost figure</th>
<th>&quot;Large&quot; expected injury cost</th>
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Switchpoint Costs: $642.99 \[
$3,297.72
\]

APPENDIX III (continued)

CPSC Inputs, Number of Saws in Use = 10 Million
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<tr>
<th>Year</th>
<th>Injury Incidence</th>
<th># of saws</th>
<th>Average rate of injury</th>
<th>&quot;Small&quot; cost figure</th>
<th>Effectiveness</th>
<th>3% discount rate</th>
<th>&quot;Small&quot; expected injury cost</th>
<th>&quot;Large&quot; cost figure</th>
<th>&quot;Large&quot; expected injury cost</th>
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Switchpoint Costs: $385.79 $1,978.63

APPENDIX III (continued)

CPSC Inputs, Discount Rate = 0%
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<tr>
<th>Year</th>
<th>Injury Incidence</th>
<th># of saws</th>
<th>Average rate of injury</th>
<th>&quot;Small&quot; cost figure</th>
<th>Effectiveness</th>
<th>&quot;Small&quot; expected injury cost</th>
<th>&quot;Large&quot; cost figure</th>
<th>&quot;Large&quot; expected injury cost</th>
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<tbody>
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Switchpoint Costs: $565.33 $2,899.45

APPENDIX III (continued)

CPSC Inputs, Discount Rate = 7%

36
### Injury Incidence

<table>
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<th>Year</th>
<th>Injury Incidence</th>
<th># of saws</th>
<th>Average rate of injury</th>
<th>&quot;Small&quot; cost figure</th>
<th>Effectiveness</th>
<th>7% discount rate</th>
<th>&quot;Small&quot; expected injury cost</th>
<th>&quot;Large&quot; cost figure</th>
<th>&quot;Large&quot; expected injury cost</th>
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### Switchpoint Costs:

- Small cost figure: $397.06
- Large expected injury cost: $2,036.45

---

**APPENDIX III (continued)**

**CPSC Inputs, Effectiveness = 80%**
<table>
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<th>Year</th>
<th>Injury Incidence</th>
<th># of saws</th>
<th>Average rate of injury</th>
<th>&quot;Small&quot; cost figure</th>
<th>Effectiveness</th>
<th>3% discount rate</th>
<th>&quot;Small&quot; expected injury cost</th>
<th>&quot;Large&quot; cost figure</th>
<th>&quot;Large&quot; expected injury cost</th>
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Switchpoint Costs: $428.66 $2,198.48

APPENDIX III (continued)

CPSC Inputs, Effectiveness = 100%
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<tr>
<th>Year</th>
<th>Injury Incidence</th>
<th># of saws</th>
<th>Average rate of injury</th>
<th>&quot;Small&quot; cost figure</th>
<th>Effectiveness</th>
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<th>&quot;Small&quot; expected injury cost</th>
<th>&quot;Large&quot; cost figure</th>
<th>&quot;Large&quot; expected injury cost</th>
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Switchpoint Costs: $535.82 $2,748.10

APPENDIX IV

Expected Replacement Cost
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$7.03
Expert Report
Dr. John D. Graham

April 27, 2010

John D. Graham, Ph.D.

Date

4/27/10
Expert Report
Dr. John D. Graham

John D. Graham, Ph.D.  
Date
Exhibit “A”
JOHN D. GRAHAM
School of Public and Environmental Affairs
Indiana University
1315 E. Tenth Street
Bloomington, IN 47405
812.855.1432
grahamjd@indiana.edu

Education

Post-Doctoral Fellow (1984), Environmental Science and Public Policy, Harvard School of
Public Health. Advisors: Professors Donald Hornig, Marc Roberts, and Howard Raiffa.

Committee: Professors M. Granger Morgan, Steven Garber and Alfred Blumstein.

Advisor: Professor James W. Vaupel

B.A. with Honors in Economics and Politics (1978), Wake Forest University.
Advisor: Professor Jack Fleer

Recent Positions

Dean, School of Public and Environmental Affairs, Indiana University, Bloomington and Indianapolis,
Indiana, 2008 to present
Directing the largest comprehensive public policy school in the United States, including a Master’s of
Public Affairs program that was tied for #2 in US News and World Report’s 2009 national ranking of
university-based programs. Supervising on two campuses (Bloomington and Indianapolis) 75 full-
time faculty, over 100 adjunct and part-time faculty, and dozens of professional staff in the delivery
of educational programs to over 1500 undergraduate majors, 300 master’s degree students and
over 80 doctoral students. Research programs cover the full range of disciplines from laboratory
and field work in environmental science to social scientific investigations. Initiated strategic planning
process leading to “SPEA 2015” and creation of a new Dean’s Council.

Dean, The Pardee RAND Graduate School, RAND Corporation, Santa Monica, California,
2006 to 2008
Led the largest policy-analysis Ph.D. program in the world. Responsible for curricula,
faculty oversight, student recruitment and placement, fundraising, commencement exercises
and disciplinary issues. Streamlined the core curriculum, established new analytic
concentrations, expanded recruitment of female and minority students, added a weeklong
workshop on American culture for international fellows, and revamped the dissertation
process to enable students to start the dissertation process earlier. Raised $3.4 million in philanthropic gifts from individuals and corporations to support scholarships, dissertations and other educational expenses.

Oversaw for President Bush federal regulatory policy, statistical policy and information policy. Directed a staff of 50 career policy analysts with backgrounds in science, engineering, economics, statistics and law. Strengthened the role of benefit – cost considerations in federal regulation while establishing new information-quality procedures in the federal government. Simplified hundreds of regulations and issued valuable new rules on clean air, auto fuel economy and food safety.

Founding Director, Center for Risk Analysis, Harvard School of Public Health, Boston, MA, 1989 to 2001
Created mission-oriented Center with programs in automotive safety, environmental health, and medical technology. Raised over $10 million in governmental and private support. Financed eight new faculty positions, new course development, and numerous doctoral students.

Deputy Chairman, Department of Health Policy and Management, Harvard School of Public Health, Boston, MA, 1987 to 1992
Supported Department Chairman in curriculum reform, faculty recruitment and evaluation, budgeting and student recruitment and placement.

Staff Associate, Committee on Risk and Decision Making, National Research Council/National Academy of Sciences, Washington D.C., 1979 to 1981
Supported Study Director and Committee Chairman in preparation of an NAS report on the future of risk analysis in national policy.

Academic Appointments

Professor of Public Affairs (with tenure), School of Public and Environmental Affairs, Indiana University, Bloomington and Indianapolis, IN (2008 to present).

Professor of Policy Analysis, Pardee RAND Graduate School, Santa Monica, CA (2006 to 2008).

Professor of Policy and Decision Sciences (with tenure), Department of Health Policy and Management, Harvard School of Public Health, Boston, MA (1991 to 2003).

Associate Professor of Policy and Decision Sciences, Department of Health Policy and Management, Harvard School of Public Health, Boston, MA (1988 to 1991).

**Doctoral Students and Fellows**

Sandra Baird (Fellow)  
Phaedra Corso (Ph.D.)  
Joshua T. Cohen (Ph.D.)  
Alison Taylor Cullen (Sc.D.)  
Diana Epstein (Ph.D.)  
George Gray (Fellow)  
Sara Hajiamiri (Ph.D.)  
Evridiki Hatziandreu (Sc.D.)  
Neil Hawkins (Sc.D.)  
David Holtgrave (Fellow)  
Nancy Isaac (Fellow)  
Bruce Kennedy (Fellow)  
Younghee Lee (Ph.D.)  
Jonathan Levy (Sc.D.)  
Ying Liu (Ph.D.)

Jill Morris (Ph.D.)  
Doreen Neville (Sc.D.)  
Susan Putnam (Sc.D.)  
Alon Rosenthal (Sc.D.)  
Dana Gelb Safran (Sc.D.)  
Mary Jean Sawey (Fellow)  
Marie Segui-Gomez (Sc.D.)  
Joanna Siegel (Sc.D.)  
Andrew Smith (Sc.D.)  
Tammy Tengs (Sc.D.)  
Kimberly Thompson (Sc.D.)  
Edmond Toy (Ph.D.)  
Eve Wittenberg (Ph.D.)  
Scott Wolff (Sc.D.)  
Fumie Yokota (Ph.D.)

**Service and Awards**

Distinguished Lifetime Achievement Award, Society for Risk Analysis (2008)

Member of the Scientific and Technology Council, International Risk and Governance Council, Geneva, Switzerland (2008 to present)


Member, Committee on the Status and Future of Federal e-Rulemaking (2008)


Annual Public Service Award for Achievements in Risk Communication to the American People, Annapolis Center, Annapolis, Maryland (1998).


Member, Ad Hoc Committee on Risk Analysis, Advisory Body to the President of the National Academy of Sciences (1994).

Member, Board of Visitors, Wake Forest University (1991 to 1994).

Member, Committee to Review the Structure and Performance of the Health Effects Institute, Board on Environmental Studies and Toxicology, National Research Council (1992-1993).

Award for Outstanding Service in Helping to Develop and Support the National Agenda for Injury Control, U.S. Centers for Disease Control (April 25, 1991)


Member, Committee to Identify Measures that May Improve the Safety of School Bus Transportation, Transportation Research Board, (1987-1988).


**Books**


**Published Papers and Reports ( * indicates peer reviewed*)**


120. Maria Seguí-Gomez and John D. Graham, “Patterns of Injury Among Drivers Hospitalized in Level-I Trauma Centers: Have Frontal Airbags Made a Difference?” 44th Annual Proceedings, Association for the Advancement of Automotive Medicine, October 2-4, 2000 Chicago, Illinois, pp. 171-185.


128.* Maria Seguí Gómez, Eve Wittenberg, Roberta Glass, Suzette Levenson, Ralph Hingson, and John D. Graham, "Where Children Sit in Cars: The Impact of Rhode Island's New


Teaching Experience

At the Harvard School of Public Health, Dr. Graham taught each year the graduate-level 2.5 credit course in cost-effectiveness analysis and cost-benefit analysis for physicians, nurses and public health students. He also advised numerous Ph.D. and Sc.D. students engaged in dissertation research on health, safety and environmental policy. In collaboration with the School's Office of Continuing and Executive Education, Dr. Graham also designed and led two Harvard "short courses" in risk analysis and communication for government and industry professionals that were offered annually in Boston and Brussels. At PRGS Dr. Graham taught the introductory core course in policy analysis, and an elective course in benefit-cost analysis. At Indiana University Dr. Graham is teaching an introductory course in risk assessment, management, and communication.

Editorial and Commentary


John D. Graham, Phantom Dangers in the (Mis) Info Age,\textit{@ Los Angeles Times}, November 14, 1996.


\textbf{Congressional and Administrative Testimony and Comments}


**Personal Facts**

Born October 3, 1956; Married to Susan W. Graham; daughters, Jennifer Ann and Kathryn Woerner; hobbies include golf, ballroom dancing and bridge. Home address: 2417 Boston Road, Bloomington, IN 47401