

**Information Collection Request
OMB 83-1 Supporting Statement
Table Saw User Recruitment and Survey**

A. Justification

1. *Circumstances Making the Collection of Information Necessary*

Table saws are stationary power tools used for cutting various materials – but primarily wood. Table saws are one of the most versatile woodworking tools and therefore a popular product among consumers for hobby and trade work. Based on a 2-year special study of emergency department-treated table saw-related injuries, CPSC staff estimates 76,100 table saw operator injuries were treated in emergency departments between January 2007 and December 2008. Of the estimated 76,100 table saw operator injuries, an estimated 66,900 injuries (88%) were related to contact with the blade. For the 66,900 blade contact injuries, an estimated 20,700 injuries (30.9%) occurred on table saws where the blade guard was in use, and estimated 44,500 injuries (66.5%) occurred when the blade guard was not in use. For all types of injuries to operators, the blade guard was not in use for 65.7 percent of injuries, with the most common reason for the absence of the blade guard as removal by the consumer (75%).

The voluntary standard for table saws is UL 987 *Stationary and Fixed Electric Tools*. UL 987 addresses the blade contact hazard with a requirement that all table saws be equipped with a guard around the saw blade. The blade guard prevents inadvertent contact with the blade; however, many users removed the blade guard from the table saw for a variety of reasons including obstruction of view of cut, hindering of cutting operation, and difficulty of installing the guard.

In November 2007, a seventh edition of UL 987 was published with requirements for a new modular blade guard that is designed to be adjustable for more cuts, to provide clear visibility of the cutting edge, and to be easily installed and removed without the use of tools. The majority of table saws sold in the United States since 2009 meet the UL 987 seventh edition requirements of the modular blade guard.

In August 2011, the US Consumer Product Safety Commission (CPSC) published an ANPR for table saws. The following excerpt from the briefing package summarizes CPSC staff's concerns about the modular blade guard system:

We are concerned that the requirements in the voluntary standard for table saws, UL 987, *Stationary and Fixed Electric Tools*, which mandate a permanent riving knife and the new modular blade guard system, may not adequately address the operator blade contact injuries associated with table saw use. While we support the recent progress UL has made in improving the voluntary standard to address blade contact injuries by focusing solely on prevention of skin-to-blade contact, the standard requirements do not appear to address adequately the number or severity of blade contact injuries that occur on table saws, nor do they address the associated societal costs. In addition, while we believe that the new modular guard design is a significant improvement over the old guard design, the effectiveness of any blade guard system depends upon an operator's willingness to use it.

Currently, it is unknown if and how consumers are using the modular blade guard. Since the usage patterns are directly linked to safety of the user, data is needed to understand the usage of the modular blade guard to determine how effective the design will be in preventing future injuries.

This population is a specific subset of all table saw users and is a hard-to-reach population. Owners of table saws that were purchased with a modular blade guard are owners that have purchased their saw within the last four years. Table saws purchased prior to this do not meet the needs of the study, and will represent a significant portion of current table saw owners. Consumers that have purchased a table saw equipped originally with a modular blade guard will be recruited through various advertisement strategies. This constitutes a convenience sample. No lists are available to generate a sample and other methods of drawing a random sample are not likely to obtain useful interviews for this subset of table saw users within the budget allocated to the project. Recruited participants, who have been verified to own table saws with a modular blade guard, will be interviewed to understand if and how the blade guard system is used.

Recruitment of participants will be through various advertisement strategies designed by and executed by Westat, CPSC's contractor for this stage of the survey. After verification that a participant does qualify (owns a table saw that was purchased with a modular blade guard), the second phase contractor, EurekaFacts, will proceed with a telephone interview gathering information about the participant's use of the modular blade guard, including if and how the modular blade guard is used.

2. Purpose and Use of Information Collection

The data collected from this survey will be used to help CPSC staff better understand if and how consumers are using the modular blade guard system. This includes when consumers install and remove the blade guard, what type of cuts are being made, and what may be preventing the use of the blade guard. By understanding more about if and how the modular blade guards are used, CPSC staff can make better-informed choices about the direction of the rulemaking process. This data, along with testing results, subject matter input analysis, and other study data, will be used as a whole by staff to develop a rule that will best prevent consumers from injury while using table saws.

Since the population of owners of table saws that were purchased with a modular blade guard is a specific and hard-to-reach population, this survey will be based on a convenience sample of recruited participants by various advertisement strategies. No results from this study will be generalized to the population. The goal is to help CPSC staff to understand more fully if and how the modular blade guard system is used by consumers.

As a part of their contract, Westat designed advertisements that they will place on popular websites, in woodworking magazines, and post in woodworking guilds with cooperation of the guilds. Respondents will have the option to go through a screening process either online or via the telephone. Respondents meeting the criteria of the study, owners of table saws with the modular blade guard system, will participate in the follow-up full-scale CATI survey about their use habits and opinions about the modular blade guard system. After completion of the full-scale CATI survey, the respondents will be sent the incentive of \$50 in the form of a check.

The CATI survey instrument was drafted through a cooperative effort of CPSC staff and EurekaFacts, LLC. EurekaFacts performed cognitive interviews with 9 participants. The resulting final survey instrument was created based on the information gathered during these sessions. The description used for modular blade guard was a particular area of focus during these interviews. The description is used in the advertisements, screening instrument, and the final instrument. Other areas that might provide problems during the survey were identified and addressed, but these were limited. The overall results indicated the survey instrument does not pose any considerable challenges to the respondent. EurekaFacts will use this survey instrument in the full-scale survey of the recruited participants. They will receive a list of recruited participants on a weekly basis based on Westat's outreach and recruitment methods. EurekaFacts will contact recruitment participants based on the day/time indicated by the participants at the end of the screening process. After the first set of interviews has been completed, initial analyses will be completed to determine if there are any problems in the survey instrument.

The budget for this project allows for the recruitment and full interview of 200 eligible respondents. EurekaFacts will generate a final report summarizing the data collected from this group of table saw owners. This allows CPSC staff to gain a better understanding into if and how the modular blade guard is being used by consumers. Any patterns that emerge can be considered in light with other testing, subject matter expert analyses, and any other data gathered as part of the rulemaking process, to create a fuller picture of the potential effectiveness of the modular blade guard design. Any patterns that emerge can also be address by CPSC staff in forming future studies with this data as a basis.

The results will be summarized into a final report, and provided to CPSC staff. The final database will also be provided to CPSC staff, where personal identifiers will not be linked to the survey results. All data, including information provided during the screening process, will be treated with sensitivity and security considerations commensurate with its level of confidential content. To the extent possible, the content will not include any personally identifiable information. Security measures will include, but will not be limited to:

- Carefully controlled access to the Contractors' server location associated with the cognitive interview recordings, and any interview recordings, contact information, and survey results.
- For the duration of the study, the Contractors will maintain a password-protected list that links participants' names and personal contact information.
- The participants' personal information and any recordings from the actual interviews or cognitive interviews will be destroyed within 60 days after the conclusion of the study.

3. Consideration Given to Information Technology

Based on the recruitment strategies, potential participants will have the option to go through the screening process via a web recruitment questionnaire, or completing the same questionnaire by calling the toll-free number provided as part of the advertisement campaign. After the verification that the respondent has a table saw that came with a modular blade guard system, the telephone interview will be conducted through CATI.

Data, any written mid-study updates, and final reports will be submitted electronically to the CPSC Contracting Officer.

4. Duplication of Information

CPSC staff is aware of only one study from 2009 conducted by industry, when the modular blade guard was new on the market. Thus, the number of owners of saws with the modular blade guard system was limited. Details to why the blade guard system was not used and other behavioral aspects linked to the system were not reported. Only owners of table saws with the modular blade guard system, who also had previously owned a saw without the system, were part of the study. This study does not answer the needs of CPSC staff to understand if and how the system is used by consumers. No other study is known to CPSC staff that collects data specific to the modular blade guard.

5. *Impact on Small Businesses*

During the participant recruitment stage, woodworking guilds will be contacted, and asked to post flyers, or include a flyer in their newsletter. This is voluntary for any entity contacted. The amount of time involved is minimal. The contractor will provide all materials. No costs will be transferred to the small businesses. The small businesses themselves will not be participating in the survey data collection.

6. *Consequences of Not Conducting Collection*

Gathering this information will play a vital role in assisting CPSC staff during rulemaking efforts for table saws. Knowing if and how consumers are using the modular blade guard is crucial in determining whether this design could reduce blade contact injuries on table saws. CPSC staff's ANPR briefing package considers the modular blade guard system, along with blade contact detection and stopping system, as possible rulemaking solutions. If the blade guard is installed properly, it covers the blade, providing protection from the blade for the consumer. To understand its possible effectiveness in reducing the number of injuries and in turn determine the best suited approach to the rulemaking effort, CPSC staff needs this information on if and how this modular blade guard system is being used.

7. *Special Circumstances*

There are no special circumstances in relation to collection of this information. The information will be voluntary and will not be used for statistical purposes.

8. *Agency's Federal Register Notice and Related Information*

A notice was published in the Federal Register on May 28, 2013 (78 FR 31897). 5 Comments were received.

9. *Payment or Gift*

The Contractor will provide a cash incentive of \$50 to participants who complete the survey. The cash incentive will be provided for participants of the full study. Those who take part in the recruitment stage (that is, those contacting the contractor with an interest in participating), but are determined not eligible for the full study will not receive a cash incentive.

10. Confidentiality

Participation in this study is voluntary. Individuals will receive informed consent at the recruitment stage and the interview stage. Participants will be informed that their identities will be kept confidential. No personally identifiable information will be used in the final report and resulting data delivered to the CPSC. The Contractors will destroy confidential identifiers at the end of the study.

Some interviews may be recorded as part of the quality control efforts of the study. These recordings will not be publically released. Demographic information collected will be generalized in all reports. No response will be attributed to a specific individual in the final report. Any recording of interviews will be disclosed to the respondent.

Any data transfers containing PII between the contractor and CPSC staff who are coordinating the connection between recruitment and the full-scale survey will be done using password protected files. CPSC staff will destroy all files containing any PII at the end of the study.

11. Questions of a Sensitive Nature

This data collection does not contain any questions that are considered typically sensitive in nature. The data collection will include questions about the respondent's demographics, general amount of time the respondent uses the table saw, and if and how the modular blade guard is used.

12. Burden of Information Collection

CPSC staff estimates that the total time during the recruitment stage to verify if the respondents fits the study's target group of consumers will be no longer than 10 minutes, while the actual survey will last no longer than 25 minutes. This creates a total time for each participant of 35 minutes, for each eligible respondent. For the 200 anticipated eligible respondents, this is a total of 116 hours (200 x 0.58 hours). According to the September 11, 2012, press release from the Bureau of Labor Statistics, the average compensational hourly rate is \$29.23. The total cost of burden for this study is estimated at \$3,391. The table breaks down the estimated cost by type of collection.

Estimated Reporting Burden				
Type of Collection	Number of Respondents	Hours per Response	Total Hours	Respondents Cost*
Recruitment** + Telephone Survey	200	0.58	116	\$3,391

*Hourly total compensation (wages + benefits) = \$29.23

** This does not include those that contact the Contractor, but are deemed ineligible for the study, due to the absence of the modular blade guard on their table saw. This is expected to be only a small number of responses, as the advertisements are written to recruit owners of only new saws that are equipped with the modular blade guard system.

13. Estimate of Total Annual Cost Burden to Respondents

There are no costs to the respondents beyond time involved as detailed in Section 12. Respondents have the option of calling a toll-free number to start the recruitment process, or they may choose to utilize a web version. This eliminates any monetary cost to the respondents, leaving only the details of Section 12 as applicable.

14. Costs to the Federal Government

The estimated cost under the federal government contract is \$276,585 for the costs of recruiting respondents and conducting the survey. In addition, one full-time CPSC employee will spend an estimated 600 hours of labor reviewing responses for a total estimated cost of \$49,488, the equal to 600 hours at an hourly compensation rate of \$57.08 for a GS-14 Step 5 employee, with an additional 30.8 percent added for benefits for a total hourly compensation rate of \$82.48. (U.S. Bureau of Labor Statistics, "Employer Costs for Employee Compensation," December 2012, Table 1, percentage of wages and salaries for all civilian management, professional, and related employees, <http://www.bls.gov/ncs>). Accordingly, the total estimated cost to the federal government is \$326,073 (\$276,585 plus \$49,488).

15. Reason for Change

This section is not applicable, as this is a new request for data collection.

16. Tabulation of Results, Schedule, Analysis Plans

The contractors will deliver final reports including introduction, background, methodologies employed, results, and conclusions to CPSC staff. The resulting database will be provided to CPSC staff.

17. Exemption from Displaying OMB Approval Date

This section is not applicable, as no exemption is sought.

18. Exemptions to the Certification Statement

This section is not applicable, as no exemptions are sought.