

SUPPORTING STATEMENT - PART A

Safety Standard Addressing Blade-Contact Injuries on Table Saws

OMB Control Number

1. Need for the Information Collection

The U.S. Consumer Product Safety Commission (Commission or CPSC) has determined preliminarily that there may be an unreasonable risk of blade-contact injuries associated with table saws. To address this hazard, the Commission proposes a rule under the Consumer Product Safety Act (CPSA) that would establish a performance standard that requires table saws to limit the depth of cut to no more than 3.5 millimeters when a test probe, acting as surrogate for a human finger or other body part, approaches the spinning blade at a rate of 1 meter per second (m/s).

This proposed rule contains information collection requirements that are subject to public comment and review by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (PRA). 44 U.S.C. 3501–3520.

2. Use of the Information

The information collection requirements will pertain to persons who manufacture or import table saws. The information collection would impose a time burden upon the respondent to gather certificate data, the time needed for creating the General Certificates of Conformity (GCC), the keeping and maintaining records associated with the GCCs, and disclosure of GCCs to third parties. CPSC would use the information collected to ensure compliance to the proposed standard.

3. Use of Information Technology

Persons that manufacture or import table saws will use information technology to submit information electronically when applicable.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another source.

5. Burden on Small Businesses

As of March 2023, CPSC is aware of 23 firms that supply table saws to the U.S. market. Of these 23 firms, seven are small according to criteria established by the Small Business Administration (SBA).

CPSC provides a variety of resources to help both new and experienced small businesses learn about safety requirements that apply to consumer products, including the CPSC Regulatory Robot, small business education videos, and the Small Business Ombudsman. Many of these resources can be accessed online at: <https://www.cpsc.gov/Business—Manufacturing/Small-Business-Resources>. Small firms can reach the Small Business Ombudsman by calling (888) 531-9070.

6. Less Frequent Collection

The proposed rule for table saws would reduce an unreasonable risk of injury associated with blade-contact injuries on table saws. CPSC staff estimates that there were an average of approximately 32,000 emergency department-treated blade-contact injuries annually from 2004 to 2020.

AIM technology has been shown to significantly mitigate the severity of injuries caused by a victim's finger, hand, or other body part contacting the blade while the table saw is in operation. Accordingly, the proposed rule would establish a mandatory performance requirement to address the risk of injuries associated with blade contact injuries on table saws. Less frequent collection of information would reduce the effectiveness of the proposed rule.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A Federal Register Notice (FRN) for the collection published on Wednesday, November 1, 2023. The FRN citation is 88 FRN 74909. Pursuant to 44 U.S.C. 3506(c)(2)(A), we invite comments on:

- Whether the collection of information is necessary for the proper performance of the CPSC's functions, including whether the information will have practical utility;
- The accuracy of the CPSC's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used;
- Ways to enhance the quality, utility, and clarity of the information to be collected;

- Ways to reduce the burden of the collection of information on respondents, including the use of automated collection techniques, when appropriate, and other forms of information technology; and
- The estimated burden hours associated with producing the GCC and the certification testing required to support the GCC.

Part B: CONSULTATION

CPSC staff is participating in voluntary standard activities for Stationary and Fixed Electric Tools (ANSI/UL 987).

For additional information on CPSC staff’s participation in voluntary standard activities related to tables saws please visit <https://www.cpsc.gov/Regulations-Laws--Standards/Voluntary-Standards/Topics/Table-Saws>.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

A Privacy Act Statement is not required for this collection because we are not requesting individuals to furnish personal information for a system of records.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden

Our estimate includes the time for gathering certificate data and creating General Certificates of Conformity (GCC), keeping and maintaining records associated with the GCCs, and disclosure of GCCs to third parties.

Table 1. Estimated Annual Reporting Burden

Burden Type	Number of respondents	Frequency of response	Total annual responses	Minutes per response	Total burden hours	Annual cost
GCC creation	23	7	161	5	13.42	\$921.28
Recordkeeping	23	7	161	1.25	3.35	\$105.36
Third Party disclosure	23	7	161	15	40.25	\$1,265.86
Total Burden	69	-	483	-	57.02	\$2,292.50

The proposed rule would require that manufacturers certify that their products conform to the rule and issue a GCC. As of March 2023, CPSC is aware of 23 firms that supply table saws to the U.S. market. Accordingly, we estimate there are 23 respondents that will respond to the collection annually. On average, each respondent may gather certificate data and create 7 certificates for complying table saws in the market. The time required to issue a GCC is conservatively estimated as about 5 minutes (although the actual time required is often substantially less). Therefore, the estimated burden associated with issuance of GCCs is 13.42 hours (161 responses × 5 minutes per response = 805 minutes or 13.42 hours).

Staff estimates the hourly compensation for the time required to issue GCCs is \$68.65 (U.S. Bureau of Labor Statistics, “Employer Costs for Employee Compensation,” March 2023, table 4, Private industry management, professional and related occupations: https://www.bls.gov/news.release/archives/ecec_06162023.pdf). Therefore, the estimated annual cost to industry associated with issuance of a GCC is \$921.28 (\$68.65 per hour × 13.42 hours = \$921.283).

For purposes of this burden analysis, we assume that the records supporting GCC creation, including testing records, would be maintained for a five-year period. Staff estimates burden of 1.25 minutes per year in routine recordkeeping. This adds up to approximately 3.35 hours (161 responses × 1.25 minutes per response = 201.25 minutes or 3.35 hours).

Staff estimates the hourly compensation for the time required to maintain records is \$31.45 (U.S. Bureau of Labor Statistics, “Employer Costs for Employee Compensation,” March 2023, table 4, Private industry sales and office occupations: https://www.bls.gov/news.release/archives/ecec_06162023.pdf). Therefore, the estimated annual burden cost associated with recordkeeping of GCCs is \$105.36 (\$31.45 per hour × 3.35 hours = \$105.3575).

The rule would also require that GCCs be disclosed to third party retailers and distributors. Staff estimates another 161 third party disclosure responses, each one of which requires 15 minutes per year. This adds up to 2,415 minutes (161 responses × 15 minutes per response = 2,415 minutes) or 40.25 hours.

Staff uses an hourly compensation for the time required to disclose certificates to third parties of \$31.45 (U.S. Bureau of Labor Statistics, “Employer Costs for Employee Compensation,” March 2023, table 4, Private industry sales and office occupations: https://www.bls.gov/news.release/archives/ecec_06162023.pdf). Therefore, the estimated annual burden cost associated with third party disclosure of GCCs is \$1,265.86 (\$31.45 per hour × 40.25 hours = \$1,265.8625).

Based on this analysis, CPSC estimates the annual PRA burden associated with the rule at 57.02 hours (13.42 hours + 3.35 hours + 40.25 hours) with a total burden cost of \$2,292.50 (\$921.28 + \$105.36 + \$1,265.86).

13. Respondent Costs Other Than Burden Hour Costs

There are no operating, maintenance, or capital costs associated with the collection.

14. Cost to the Federal Government

The estimated annual cost of the information collection requirements to the Federal Government is approximately \$4,513, which includes 60 staff hours to examine and evaluate the information, as needed, for CPSC's compliance activities. This is based on a GS-12, step 5 level salaried employee. The average hourly wage rate for a mid-level salaried GS-12 employee in the Washington, DC metropolitan area (effective as of January 2023) is \$51.15 (GS-12, step 5). This represents 68.0 percent of total compensation (U.S. Bureau of Labor Statistics, "Employer Costs for Employee Compensation," March 2023, Table 2., percentage of wages and salaries for all civilian management, professional, and related employees: https://www.bls.gov/news.release/archives/ecec_06162023.pdf). Adding an additional 32.0 percent for benefits brings average annual compensation for a mid-level salaried GS-12 employee to \$75.22 per hour. Assuming that approximately 60 hours will be required annually, this results in an annual cost of \$4,513 ($\$75.22 \text{ per hour} \times 60 \text{ hours} = \$4,513.20$).

15. Reasons for Change in Burden

This is a new collection with a new associated burden.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.