B11 STANDARDS DEVELOPMENT COMMITTEE

"Safety Standards for Machines"

B11 Documents/Subcommittees

B11.0
Safety of Machinery
B11.1
Mechanical Power Presses
B11.2
Hydraulic Power Presses
B11.3
Power Press Brakes
B11.4
Shears
B11.5
Ironworkers
B11.6
Manual Turning Machines
B11.7
Cold Headers & Cold Formers
B11.8
Manual Milling, Drilling, & Boring Machines
B11.9
Grinding Machines
B11.10
Metal Sawing Machines
B11.11
Gear [Spline] Cutting Machines
B11.12
Roll Forming & Roll Bending Machines
B11.13
Automatic Bar and Chucking Machines
B11.14 (withdrawn: now part of B11.18)
B11.15
Pipe, Tube and Shape Bending Machines
B11.16 (MPIF #47)
Powder/Metal Compacting Presses
B11.17
Horizontal Hydraulic Extrusion Presses
B11.18
Coil Processing & Coil Slitting Machines
B11.19
Performance Requirements for Risk Reduction Measures; Safeguarding & Other Means
B11.20
Machinery Integrated into a System
B11.21
Machine Tools Using Lasers
B11.22
Turning Centers and Automatic Numerically Controlled Turning Machines
B11.23
Machining Centers and Automatic NC Milling, Drilling & Boring Machines
B11.24
Transfer Machines
B11.25
Large Machines
B11.26
Functional Safety; Control Systems for Machines
B11.27
Electro-Discharge Machines
B11.TR 1
Ergonomic Guidelines
B11.TR 2
Metal Working Fluid Mist Control Considerations
B11.TR 3
Risk Assessment & Risk Reduction **(withdrawn)**
B11.TR 4
Selection of PES / PLC
B11.TR 5
Noise Measurement Techniques
B11.TR 6
Safety Control Systems **(withdrawn: now B11.26)**
B11.TR 7
Integrating Safety into Lean Manufacturing
B11.TR 8
Guide to Inspection of Risk Reduction Measures
B11.TR 9
Guidance on Machinery Safety Cybersecurity
B11.TR 10
Functional Safety and Artificial Intelligence
ANSI / ISO 12100 –
General Safety Principles, RA/RR
B11 SDC
U.S. TAG to ISO/TC 39 /SC 10
B11.TC 199
Adoption of International Standards

CHAIR
Alan Metelsky, FS Eng
The Gleason Works
1000 University Ave.
Rochester, NY 14692
PH: 585-784-6927
Fax: 585-241-4047
ametelsky@gleason.com

VICE CHAIR
Anne Mathias, PE
Engineering Systems, Inc.
4215 Campus Dr.
Aurora, IL 60504
Phone: 630-851-4566;
Fax: 603-851-4651
acmathias@engsys.com

SECRETARY
David Felinski
B11 Standards, Inc.
POB 690905
Houston, TX 77269
Phone: 832-446-6999
dfelinski@b11standards.org

OSHA Docket Office
Docket No. OSHA–2007–0003
RIN 1218-AC98
U.S. Department of Labor
Room N–2625, 200 Constitution Avenue, NW.
Washington, DC 20210

7 October 2021

Please find enclosed, a consensus response from the ANSI B11.1 Subcommittee to the 68 questions published in your 28 July 2021 Federal Register (RFI) notice requesting information regarding mechanical power presses.

Please direct any questions regarding this submission of comments to David Felinski, ANSI B11 Secretariat, at either 832-446-6999 or dfelinski@b11standards.org.

OSHA Questions	*ANSI B11.1 Subcommittee Responses*
A. Hazards and Incidents	
OSHA seeks comments on hazards associated with the operation of mechanical power presses and presses other than mechanical power presses, *i.e.,* hydraulic and pneumatic presses. CDC last studied Injuries and Amputations Resulting from Work with Mechanical Power Presses in the late 1980s and this study was specific to Mechanical Power Presses. OSHA requests additional studies or data on workplace injuries or fatalities related to mechanical power presses and presses other than mechanical power presses, particularly recent studies or data.	
(1) Is there more recent information about the risks and hazards associated with the operation of power presses?	The nature of these risks and hazards have not changed. Manual operations have probably declined with automated operations increasing. In automated systems, injuries typically occur during job setup or when clearing a jam.
(2) Based on a review of accident and injury data (see Table 1), OSHA has identified finger and fingertip amputations, crush injuries, lacerations, and fractures as the main types of injuries caused by mechanical power presses. Please supply any additional information on these and other injuries associated with power presses?	The OSHA IMIS database contains the inspection reports for all of OSHA's accident investigations and includes both past and more recent data on workplace injuries and fatalities on metalworking presses – including mechanical power presses, hydraulic presses, and press brakes. It includes investigation reports from state OSHA agencies as well as federal OSHA. It should provide more complete and some more recent data than Table 1 in the RFI, which is based on accident reports to federal OSHA required by 29 CFR 1910.217(g).
(3) How frequently are workers using power presses injured? How frequently are workers using power presses severely injured? How frequently are workers using power presses fatally injured?	All reports of accident inspections (until mid-2020, some 3,671 reports) are contained in the IMIS database, although substantial effort is required to parse out granular information such as that requested since details regarding the circumstances/injury and the type of press involved (many of which have nothing to do with metalworking presses) are only available by accessing and reviewing each individual report. Review of the reports in the IMIS database indicated that mechanical power press worker fatalities are infrequent (~ 1 fatality/year) particularly considering the projected number of these machines in active commercial use, and

OSHA Questions	ANSI B11.1 Subcommittee Responses
	are usually related to non-production tasks, particularly during production operations.
(4) Do injury rates and severity vary based on the type of press used or other factors?	We have no statistical data or information to offer, however, from anecdotal evidence and historical trend, we believe that manually operated presses had a higher incident rate than automatic presses and also, that full-revolution clutch presses had a higher incident rate than part-revolution clutch presses.
(5) Have injury rates associated with the use of power presses increased or declined over time? If so, why?	Press manufacturers participating in the B11.1 subcommittee have seen a dramatic decrease in the number of reported incidents in the last 20 years. This could be due in part to decreased manual operations, progression to automatic operations from manual operations, employers taking more responsibility in the utilization of safeguarding systems, and undoubtedly, it is reasonable to conclude that replacement and/or refurbishment of older presses with equipment that meets newer ANSI B11.1 standard requirements is also a factor in the reduced injury rates. However, recent injury incidents could be attributed to a lack of training or a worker's inability or failure to follow training. Earlier OSHA 1910.217(g) Reports indicated that: • full revolution clutch presses had significantly more injuries per press than part revolution clutch presses. They have essentially not been produced and sold by press builders for several decades, and stampers have scrapped all but a small percentage of full revolution presses, reducing the injuries related to these machines. • the use of foot controls for cycling on mechanical power presses produced more injuries than hand controls. Foot control of part revolution clutch presses has been drastically reduced, with attendant fewer injuries. It is also believed that: • replacement and refurbishment of older presses with equipment from manufacturers that meet newer ANSI B11.1 standard requirements are also a factor in reduced injury rates. Productivity increases associated with intelligent controls and increasing automation employed for press production systems have contributed to a reduction in the overall number of power presses used by industry, thereby contributing to a reduction in injuries.

OSHA Questions	*ANSI B11.1 Subcommittee Responses*
B. Power Presses Standard	
OSHA seeks comment on how it should update the mechanical power presses standard.	
(6) Should OSHA use ANSI B11.1 as the basis for a standard update?	Yes
(7) Are there provisions in the ANSI standard not in the OSHA standard that are important for providing worker protection?	Yes – there are new and updated requirements involving the use and safeguarding of power press production systems that are found in the 2009 revision of ANSI B11.1 that are not in 29 CFR 1910.217. These new/updated provisions include: • requirements for use of additional production modes of operation such as *Operator Maintained Continuous*, *Automatic Single Cycle*, and *Continuous on Demand*; • requirements for function and for risk assessment/risk reduction for all aspects of increasingly complex press production systems including auxiliary and ancillary automation equipment for coil and blank feeding and transferring material, removal of parts and scrap, and automatic die change in both single and multiple press production systems; • requirements for perimeter guarding and whole-body access guarding in addition to the point of operation guarding required in 29 CFR 1910.217; • additional requirements for guards and devices not addressed by 29 CFR 1910.217; • requirements for performance of safety related functions that depend on preventing or stopping hazardous motion to protect personnel. [Similar to control reliability but applies to all press operations, not just hands in die manual operations as stated in 29 CFR 1910.217(c)(5)]; • requirements for direct drive servo presses which are increasingly being purchased and used by stampers to obtain flexibility in production operations not available with part revolution clutch power presses.
(8) If the agency bases a revised standard on ANSI B11.1, should OSHA add explanatory material in the form of non-mandatory appendices?	Yes, if you want to be able to explain the requirements so they are understood. The standard is developed and published in the two-column format. The right column consists of informational guidance or useful editorial comment that attempts to explain through greater illustration and/or examples, what is written in the left (requirements) column. Standards that do not use the two-column format typically place this type

OSHA Questions	ANSI B11.1 Subcommittee Responses
	of explanation in "informative notes" immediately following the paragraph containing the actual requirement. All this text is helpful, especially if the user is reading the requirements for the first time, as some of the requirements text can become very complex and difficult to grasp. The current standard also contains significant informative language and several very helpful Annexes. There are annexes with operational information that would be useful material.
(9) Would employers find a non-mandatory appendix useful if it addressed similar subjects as the explanatory text in the latest ANSI standard?	Yes
(10) What material, if any, should be in the appendices?	Please refer to the ANSI B11.1-2009 mechanical power press safety standard. Applicable areas would include: • Annex B - Examples of Task-Based Hazards, • Annex C - Safety Distance (these safety distance requirements are more current than what is presently contained in OSHA 1910.217) • Annex I - Typical Die Setting Procedures All right column text should be considered in addition to the above Annexes.
(11) If OSHA updates the standard to be consistent with the provisions of ANSI B11.1-2009 or its equivalent, should OSHA exclude all of the machines that ANSI B11.1-2009 excludes?	Yes – these other machines are excluded either because they are not constructed like mechanical power presses or they are not used like mechanical power presses. In addition, many if not most of those excluded machines have their own type-C machine safety standard.
(12) If so, why?	The ANSI B11.1-2009 standard is already relatively extensive and thorough in presenting safety requirements for mechanical power presses only. Adding other machines to these requirements would both expand the size of the standard and add difficulty and potential confusion for employers to discern which requirements apply to each machine.
(13) Alternatively, should OSHA continue to exclude only the machines currently excluded by the OSHA standard?	We recommend you exclude the machines that are excluded in ANSI B11.1-2009. See also, our response to #15.
(14) Should OSHA exclude any other machines that ANSI B11.1-2009 does not specifically excluded?	We are not aware of any other machines.
(15) What are these other	ANSI B11.1 also excludes: cold headers and cold

OSHA Questions	ANSI B11.1 Subcommittee Responses
machines and why should OSHA exclude them?	formers; eyelet machines; high–energy–rate presses; iron workers and detail punches; metal shears; powdered–metal presses; press welders; turret and plate–punching machines; wire termination machines and welding presses. Many of these machine types are excluded simply because there is an existing and separate type-C ANSI B11 standard covering the safety requirements for that particular machine. Also, OSHA is required by the U.S. Congressional National Technology and Transfer Advancement Act to reference recognized industry consensus standards when/where possible, or otherwise, articulate and justify why the relevant and available consensus standard is inadequate for their needs. Some of the machines listed have such consensus standards in place so there is no need for OSHA to embrace these in the scope of a revised 29 CFR 1910.217. Others of the listed machines under the "exclusions" subclause have significantly different characteristics such that the writing sub committee of experts saw fit not to include in the existing consensus standards for mechanical or hydraulic presses. These differing characteristics could include both construction and use factors that exclude them from the ANSI B11.1 standard.
16) Is your firm currently complying with the ANSI B11.1 standard?	Ideally, this needs to be answered by employers (users); as an accredited standards development committee on the safety of presses, we are aware of and have observed 'progressive' employers (users) who work towards conformance with the current edition of B11.1.
17) Is compliance with any of the provisions in the ANSI standard prohibitively costly? If so, please specify which provisions are prohibitively costly.	Safety is of paramount importance to the B11.1 Subcommittee. Conforming with the requirements of ANSI B11.1 is both technologically and economically feasible. Conformance with the ANSI B11.1 standard is not prohibitively costly. It should be noted that 29 CFR 1910.217(c)(5) already includes many costs associated with the provisions for ANSI B11.1-2009 standards when two-hand controls, presence sensing devices, or type B gates are used in hands-in-die operations. Since most new control systems and safeguarding systems conform with the ANSI B11.1-2009 standard, cost would primarily be associated with retrofitting older press production systems to conform with the additional ANSI B11.1 provisions. In the decades since the inception of OSHA and ANSI B11.1 standards, a competitive safety industry has evolved that supplies safety components and both standard and

OSHA Questions	***ANSI B11.1 Subcommittee Responses***
	custom safety control and safeguarding devices that comply with the ANSI B11.1-2009 standard, making compliance both easier to accomplish and less costly.
18) Do you believe it would be less costly for your firm to comply with the ANSI standard as opposed to OSHA's existing standard?	Ideally to be answered by an employer (user), but see also, our response to #17 (above).
19) If so, in what areas do you anticipate savings, including reduced compliance costs and/or improved efficiency?	Intelligent diagnostics used with increasingly integrated press and automation controls and production process system sequencing and monitoring quickly identify problems that stop production and reduce downtime. Additional press features addressed, such as slide locks, can increase safety, efficiency and productivity as well as reduce conformance costs to ANSI B11.1 and compliance costs for 29 CFR 1910.217.
C. Standards other than ANSI Consensus Standards (No specific questions – just seeking general comments regarding other standards besides B11.1).	First and foremost, we are compelled to point out that OSHA is a federal regulatory agency of the United States, and ANSI is the U.S. Member body to the ISO and is a *U.S.*-based federation of industry, government and labor that accredits approximately 230 organizations to develop ***American*** National Standards. Without speaking on behalf of the other ~229 ANSI-accredited Standards Developing Organizations, we can assert with confidence that the ANSI B11 Standards Development Committee does indeed take into account existing OSHA regulatory standards in its machine safety standard development activities. The Standards Council of Canada (the Canadian counterpart to ANSI, and through one of its four standards developing organizations – CSA) does have a Canadian press safety standard, although their standard attempts to be inclusive to all presses and not just mechanical presses. ISO (through Technical Committee 39, Subcommittee 10) recently developed a series of press safety standards (and that development *did* benefit from both American and Canadian participation by the way) but approached the development of the ISO press safety standard in a manner that is atypical for ANSI (though quite typical for ISO), which was to develop a multi-part standard that parses requirements into an overarching 'interconnected' standard that consists of one "Part" each for "general requirements," "mechanical power presses," "hydraulic power presses," "pneumatic power presses" and "servo presses." While there is reasonably good alignment (considering the innate disparities of content and format described further on)

OSHA Questions	*ANSI B11.1 Subcommittee Responses*
	between ANSI and ISO standards in these areas, we caution OSHA that the content and purview of ISO standards is generally considered as unfit for purpose for the United States' cultural and regulatory schema, expectations and requirements. The two largest and most significant areas where this problem becomes evident is in the complete lack of any employer (user) requirements in ISO standards, and the fact that ISO standards ONLY address new machinery manufactured after the date of publication. This is because the ISO (and to a lesser extent the IEC) are primarily Geneva-based Euro-centric organizations (with agreements in place such as the Vienna and Frankfurt agreements) that enable a fast-track process for CEN standards (these are European-only regional consensus standards, NOT global consensus standards and are developed absent any U.S., Canadian, Japanese, etc. input) and they rely entirely on the European Commission's *Machinery Directive* (2006-42-EC) which places 100% of the responsibility for placing a "safe" machine into the stream of commerce on the machine builder/supplier, whereas we have a regulatory agency (OSHA) that places 100% of that responsibility on the employer. European Union member states have a patchwork of Directives that address employee safety, and here, we have a robust system of product liability and tort law to help ensure that manufacturers do the right thing, so essentially (and ideally), the U.S. and the EU tend to arrive at more or less the same place, although the path taken is dramatically different. We mention all the above simply to underscore the fact that the ANSI B11 standards not only address ***BOTH*** manufacturer and employer requirements, but those standards ALSO address existing (legacy) machinery. This inclusion becomes exceedingly important considering the fact that there remain, in all likelihood, a significant number of decades-old or possibly even 100+ year old mechanical power presses still in use by industry and that remain perfectly capable of manufacturing parts to desired specifications. In summary, we are not aware of any national or international press safety standards beside the CSA and ISO standards, and we would strongly recommend against OSHA's consideration of other than the ANSI B11 standard(s), and for the significant reasons cited above.
D. Presses other than Mechanical Power Presses	

OSHA Questions	*ANSI B11.1 Subcommittee Responses*
In this RFI, OSHA seeks comment on whether it should regulate other types of presses, i.e., hydraulic and pneumatic presses.	
20) Should these presses be covered under a new standard written in the fashion of the existing mechanical power presses standard, § 1910.217?	Yes – if time and energy could be expended to achieve it.
21) Should OSHA base any new requirements for hydraulic and pneumatic presses on ANSI B11.2-2013 (R2020), Safety Requirements for Hydraulic and Pneumatic Power Presses?	Yes
22) Does compliance with the ANSI B11.2-2013 (R2020) consensus standard provide adequate protection for workers using hydraulic and pneumatic presses?	Yes – the subject matter and safety experts who developed that American National Standard contend that such is the case.
23) Are there any ANSI B11.2-2013 (R2020) provisions or other protections critical to protecting workers that OSHA should include if the agency decides to propose a rule addressing non-mechanical power presses?	No – use the standard as is.
24) If so, which ones?	NA
25) Do you currently follow other ANSI consensus standards corresponding to any other types of presses (for example, ANSI B11.4, Safety Requirements for Shears)?	While there are machine users on both the ANSI B11.1 writing Subcommittee and the B11 Standards Development Committee, this is a question more directed toward individual machine users and it is inappropriate for us to proffer a response.
26) Are any provisions in this ANSI standard especially costly or difficult to comply with?	See our response to question #17.
27) If so, which ones?	NA
E. Presence-Sensing Device Initiation	
Both the ANSI B11.1-2009 standard and the existing OSHA mechanical power presses standard, § 1910.217, contain requirements for PSDI. However, unlike the ANSI standard, OSHA's standard	

OSHA Questions	*ANSI B11.1 Subcommittee Responses*
requires third-party validation for PSDI. As previously noted, no third party has stepped forward to issue such certification.	
28) Should OSHA revise or eliminate its requirements regarding the use of PSDI systems?	We suggest that OSHA revise the current requirements to eliminate third-party certification/validation and enforce integrity of the system by user self-certification/validation, as specified in ANSI B11.1-2009, clause 10.6.1. Conformance to the B11.1 requirements would necessitate a documented risk assessment which OSHA could use to validate the employer (user) self- certification/validation.
29) Should OSHA base its PSDI requirements on the PSDI requirements in ANSI B11.1-2009?	Yes
30) Are there any types of operations that should not allow PSDI?	PSDI should not be used on operations: • where a pass-through hazard may exist (8.6.3.20 & 10.2); • other than manual single stroke operations; or • with a bolster plate area greater than 1 m^2 (this requirement is not found in the current ANSI B11.1-2009, but will be in the new edition); • with full revolution clutch presses.
31) If so, which operations and why?	See our response to #30.
32) Should OSHA consider an option that includes regulating other types of power presses?	OSHA currently regulates hydraulic power presses under 29 CFR 1910.212 general machine guarding. There is no OSHA prohibition against PSDI for hydraulic power presses. ANSI B11.2-2012 does have requirements specific to hydraulic power presses, which include PSDI. If OSHA does decide to promulgate standards specific to hydraulic power presses, it should consider adopting or at least aligning with the ANSI B11.2 standard.
33) Are there any types of power presses that should not allow PSDI?	Yes
34) If so, which ones and why?	See our response to #30.
35.1) Should OSHA eliminate the third-party validation requirement?	Yes; any certification requirements should not require a third-party certification and any certification requirements should be modified from those currently in OSHA.
35.2) OSHA also seeks comment on whether it should continue to include mandatory and/or non-mandatory appendices with additional requirements for PSDI.	Yes – the appendices should continue to provide guidance and requirements on the establishment of a PSDI system. B11.1 and B11.19 address the requirements of PSDI.
36) If OSHA were to eliminate	We assert that incorporation of the technology must follow

OSHA Questions	*ANSI B11.1 Subcommittee Responses*
the existing requirements for PSDI systems, would you incorporate this technology on your existing power presses?	ANSI B11.1 and ANSI B11.19.
37) What would it cost to incorporate PSDI technology into your presses?	When implemented on new equipment, the initial cost is acceptable and can often be justified by the return on investment.
38) Do you agree that PSDI devices would improve productivity?	Yes; PSDI could improve productivity somewhat, but perhaps not to the extent some have claimed or that some might expect. It has primarily been used for hand-fed press operations that are more prevalent in short-run production operations, which may require several time-consuming die changes in one day, thus diluting the time saved through the use of PSDI.
39) If so, to what extent?	Yes, but productivity improvements are dependent upon the production operation; also, ergonomic and health improvements (avoidance of carpal tunnel syndrome, shoulder fatigue) could be a benefit.
F. Existing Presses	
40) How many power presses do you use at your facility?	While there are machine users on both the ANSI B11.1 writing Subcommittee and the B11 Standards Development Committee, this is a question more directed toward individual machine users and it is inappropriate for us to proffer a response.
41) What type of presses are they (mechanical, hydraulic, and pneumatic), and, if any are mechanical, how many do you use and what percentage of those mechanical power presses have part-revolution clutches? The agency seeks comment on the service life of mechanical power presses.	See our response to #40.
42) What type of press would you purchase to replace a mechanical power press?	See our response to #40.
43) What proportion of those mechanical power presses would you replace with presses equipped with part-revolution clutches?	See our response to #40.
45) Would you upgrade any of your presses to meet the ANSI B11.1 consensus standard, or would you replace the presses?	See our response to #40.
46) What percentage of your	See our response to #40.

OSHA Questions	*ANSI B11.1 Subcommittee Responses*
presses would you upgrade versus replace?	
G. Modifying and Repairing Existing Presses; Records of Maintenance	
47) Should OSHA require that only competent persons perform these tasks?	Yes
48) If so, how should OSHA define the term “competent person” with respect to mechanical power presses?	One who has experience, knowledge and associated technical skills on the design, maintenance, use and operation of a press
OSHA also seeks comment on how to handle documentation of maintenance on power presses.	
49) Should OSHA require documentation and, if so, should OSHA require document retention and access?	Yes, and yes, for a specified time frame (e.g., three years).
50) Who should maintain the documentation: the manufacturer, the owner, or a third party?	The machine user (employer).
H. Reporting and Recordkeeping Requirements	
OSHA requires that employers keep separate records and submit reports for injuries to employees operating mechanical power presses. These records are specific to OSHA’s mechanical power presses standard and were put in its standard to allow OSHA to track the effectiveness of its mechanical power presses standard.	
51) Are employers aware of these specific reporting requirements, and that they are additional to BLS occupational injury data collections and OSHA SIR reporting?	While there are machine users on both the ANSI B11.1 writing Subcommittee and the B11 Standards Development Committee, this is a question more directed toward individual machine users and it is inappropriate for us to proffer a response.
52) Should OSHA retain these requirements?	See our response to #51.
53) Should OSHA modify these requirements and, if so, how?	See our response to #51.
I. Affected Industries and Economic Impacts	
OSHA seeks comments on what occupations employ power	

OSHA Questions	*ANSI B11.1 Subcommittee Responses*
press workers.	
54) Do the job titles listed above encompass all power press workers?	While there are machine users on both the ANSI B11.1 writing Subcommittee and the B11 Standards Development Committee, this is a question more directed toward individual machine users and it is inappropriate for us to proffer a response.
55) If not, what job categories or job titles should OSHA include?	See our response to #54.
56) What are the job titles of workers who use power presses at your facility?	See our response to #54.
57) Would you classify your facility's power press workers in one of the occupations listed above or is there a more appropriate occupational category for them?	See our response to #54.
58) How many total workers are at your establishment and how many of those workers use power presses as part of their job?	See our response to #54.
59) What types of power presses do they use (mechanical, pneumatic, hydraulic, or other)?	See our response to #54.
60) If those employees work on mechanical power presses, how many (or what percentage) of those presses have part revolution clutches?	See our response to #54.
OSHA seeks comment on the industries that employ mechanical power press workers, and, if possible, those that use mechanical power presses with part-revolution clutches.	While there are machine users on both the ANSI B11.1 writing Subcommittee and the B11 Standards Development Committee, this is a question more directed toward individual machine users and it is inappropriate for us to proffer a response.
61) Are there any affected industries that the agency has not included in Table 3?	Table 3 appears to us to be comprehensive.
62) If so, which ones and how are those industries using mechanical power presses?	See our response to this subsection above.
To further refine this estimate, the agency seeks comment on the service life of mechanical power presses.	While there are machine users on both the ANSI B11.1 writing Subcommittee and the B11 Standards Development Committee, this is a question more directed toward individual machine users and it is inappropriate for us to proffer a response.

OSHA Questions	*ANSI B11.1 Subcommittee Responses*
63) What type of press do you typically purchase to replace a mechanical power press?	See our response to this subsection above.
64) What proportion of those replacement mechanical power presses are replaced with presses equipped with part-revolution clutches?	See our response to this subsection above.
Expected impacts of a revision based on current consensus standards	
65) Would small entities face economic or technological feasibility concerns in complying with a revised standard that references current consensus standards?	Technological feasibility should not be the issue but we cannot speak to whether or not small entities would face economic issues since each entity would face its own unique circumstances or situation or challenges.
66) If OSHA promulgated standards similar to the mechanical power presses standard for hydraulic and pneumatic presses, would this raise any economic or technological feasibility concerns specific to small businesses?	Again, technological feasibility should not be the issue but we cannot speak to whether or not small entities would face economic issues since each entity would be unique.
67) If you identify as a small entity in your industry, what is the basis for that identification	We are not at all what is described or intended by this question so it is inappropriate for us to attempt an answer.
J. Other Issues	
68) Are there any other issues related to mechanical, hydraulic, or pneumatic power presses that OSHA should address? Include issues remaining from, or not sufficiently addressed in, the 2007 ANPRM.	