



Stage Machinery Working Group

E1.72 - 202x, Powered Floor Machinery Public Review 2 Comment Resolutions

Reference document: E1.72 - 202x, *Powered Floor Machinery* (Document number SL/2022-10001r4a)

ANSI Public review period: 17 February 2023 through 04 April 2023

Question: In your opinion, do you think the requirements of E1.72 - 202x, *Powered Floor Machinery* (DCN SL/2022-10001r4a) are reasonable, and adequately address the intended subject matter?

Please answer the question using one of the options below. Select “Yes”, “Yes, but...” (provide comments to support your opinion), or “No, with reasons” (the document’s requirements are unacceptable or unreasonable).

Responses:

Michael Brubaker, Associated Controls & Design	Yes, but...
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Individual Comments (all from Mike Brubaker):

No.	Ref. section	Comment	Proposed resolution
1	2.2 Publications.	29 CFR 1910.212 is a part of the Occupational Safety and Health Act. Suggest this line should read “OSHA 29 CFR 1910.212 Machinery and Machine Guarding”	Rejected. 29 CFR 1910.212 was not referenced. OSHA a legal requirement, not a referenced voluntary standard.
2	3.4 Drive System.	Suggest revising to "Part of a load bearing machine that executes movement and holding of the load and which converts energy into movement." This machinery may or may not be load bearing (for example, a wagon with an external drive chain or cable).	Accepted.
3	3.5 Emergency Stop.	Suggest revising “human” to “user.” Intent is to bring this usage in line with the draft controls standard as well as the draft curtain machine standard.	Accepted in principle. Emergency Stop definition changed to match draft E1.64 as of 4/6/2023
4	Definitions	Add a definition for “User.” Suggest: “User. Any person or group of persons that use the equipment for the intended purpose.”	Rejected. Application of the word user in this document does not differ from that of the Merriam Webster dictionary.
5	4.2	Identify the Affected Parties. Suggest moving “Reasonable risk mitigation depends on who is at risk” to an annex note and expanding on it with some examples.	Rejected. Task group intent is to provide illustrative content in the document.
6	4.3	Suggest moving the second half of this section, starting with “There are many way to identify hazards.” to an annex note.	Rejected. Task group intent is to provide illustrative content in the document.

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		This section appears more illustrative than normative.	
7	4.4	First paragraph, suggest that “should” be revised to “must”.	Accepted in principle. Sentence deleted.
8	4.4	Suggest moving everything from “Risk assessment and hazard...” on in this section to an annex note. This part appears to be more illustration than normative.	Rejected. Task group intent is to provide illustrative content in the document.
9	4.5.3	Suggest revising this section to “Repeat the risk assessment and mitigation process until an acceptable level of residual risk is achieved.” The mitigation also has to happen to actually reduce the risk. Striking “residual” is clearer, I think.	Accepted.
10	4.6	Suggest moving everything from “Standing the risk assessment in writing...” onward to an annex note. This part appears to be more illustrative and explanatory than normative.	Rejected. Task group intent is to provide illustrative content in the document.
11	5.1.2	For clarity, both start and end should be the same—either “static condition” or “static state”.	Accepted.
12	5.2.1	Should “centrifugal” be “centripetal”? Centripetal is the defined force regarding rotary motion.	Accepted in principle. Sentence has been generalized to include all rotational forces.
13	5.2.2	Suggest “...machinery users...” instead of “operators” for consistency with earlier comments.	Accepted in principle. Language changed to include users.
14	5.2.4.1	This paragraph appears that it could apply to a wagon, turntable, or treadmill (where the machinery is built into the device), making the loading potentially inadequate. Ref. IBC and ANSI E1.62 (150psf and 100psf, respectively). Suggest revising the loading requirement OR clarifying how and when this loading applies.	Accepted. Load application has been clarified.
15	5.4.4.7	“designer” should be “system designer” as that is defined.	Accepted.
16	5.5.2.2	Suggest revising to: “...they shall be so encased as to prevent injury to personnel or damage to property.” This standard has been using terminology closer to what I’ve suggested rather than what I removed.	Accepted.
17	5.5.2.2	Suggest clarifying “substantial construction” and “securely fastened.” Perhaps along the lines of “...shall be sized for the characteristic load and secured from falling.”	Rejected. Existing language adequately describes intent.
18	6.1.2	I assume the reference to chapter 10 in the second sentence is to NFPA 79, Chapter 10? If so, while redundant, consider revising to “...shall be exempt from those requirements in NFPA 70, Chapter 10.”	Accept in principle. Reference to chapter 10 deleted.
19	6.2.2	Suggest changing “operator” to “user”. “Operator” is the device—button, etc.	Rejected. Application of the word operator in this document does not differ from that of the Merriam Webster dictionary.

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20	6.3	Suggest revising the last sentence to “Enabling device users shall have no other task assigned at the time of monitoring.” Is the intent of this section that enable devices must be activated by people?	Rejected. Application of the word operator in this document does not differ from that of the Merriam Webster dictionary.
21	6.4.4.2	Suggest adding to the end of the second sentence “...by a competent person.”	Accepted in Principle. “...by the operator.” Added to the sentence.
22	6.4.6.6	First sentence, suggest revising “should” to “shall.” Without a way to override, it seems that there’s no way to remove the fault.	Rejected. Not all fault situations require control system overrides to clear.
23	6.4.8	Suggest revising to “Unintended start: The start of machine motion may be initiated by a user or PES as determined by risk assessment. Restart of machine motion following a fault condition shall require deliberate action by the user.” Two reasons: 1) removes “operator” from this context and 2) allows a PES to start motion.	Accepted in principle. PES exception added.
24	6.4.4.1.4	This appears to disallow a control system set up with wired e-stop loop that includes the ultimate limits wired in series—is that intentional?	Assuming reference is to 6.5.4.1.4...Rejected. A system as described by the commentor is possible within the language of the document.
25	6.5.5.5	In the second sentence, suggest changing “should” to “shall.” If accurate positioning is required, then the linkage outlined is required. In the second paragraph, suggest changing “can” to “may”. This is more in keeping with the style of the document.	Accepted.
26	6.6.1.1	Suggest revising the second sentence to ...and the functional needs of the machine system as determined by the system designer.”	Rejected. Redundant and does not add and substantive requirement.
27	6.6.1.3	Suggest changing “operator” to “user”.	Rejected. Application of the word operator in this document does not differ from that of the Merriam Webster dictionary.
28	Section 7	Throughout and as appropriate: Suggest replacing instances of “operator” or “operators” with “user” or “users.” Keeping in mind that a PES performs some of the functions described, additional changes/adjustments to language in this section are probably needed.	Rejected. Application of the word operator in this document does not differ from that of the Merriam Webster dictionary.
29	8.2.2.2	Please clarify for “full range of...speeds”. On a variable speed system, are there logical or typical speed points to test—e.g. 10%, 20% or 25%, 50%, 75%, 100%? (% of maximum speed).	Accepted in principle. Clarification added to the sentence.
30	10.4	Does this section need to have the same exception as 6.1.2?	Accepted. Exception added.