



OSHA—Rules for the Workplace

There are really three ways to try to figure out the speed limit. One reliable way is to look at the posted signs. The second is to look around at the other cars, and base your speed on those around you. And the third is to drive until you get a ticket and then find out the hard way. But what if there are no signs around, and nobody is receiving any tickets? Then, by default, the cars would need to look at each other to determine what the rules are.

That is effectively what is happening with the high tech industry: companies do not understand the legal requirements, due to the lack

of "clear signs", and there are not many "tickets" for non-compliance being given out, which would effectively educate the industry. So companies are left to look at each other's products to determine the requirements.

In doing so, there are particular industries that obviously are not aware that there are requirements from OSHA for the workplace in the US. Those industries include manufacturers of...

- semiconductor equipment
- biotech & laboratory equipment



- low voltage products with external power adapters, such as a networking hub or wireless access point, and
- low voltage computer peripherals, such as mice or keyboards (the exception is for products with internal batteries).

Being familiar over the years with the OSHA requirements —

The PSES Symposium

Greetings to all after the successful symposiums.

We thank all of you who stopped by the SEL-CKC booth, and participated in SEL's 'Compliance IQ Test': 26 at the PSES Symposium and 72 at the EMC Symposium. We won't mention the names of some of you who chickened out...

We are pleased to announce that Steve Stegner, from Microsoft, is the winner of our grand prize, with a total of 13 correct responses in 60 seconds, and is the recipient of the Apple Mini iPod.

The next highest score was 10 correct and three of you achieved that, as honorable mention goes to:

- Dave Snyder from Nortel Networks,
- Gaetan Hogue from Elcon Networks, and
- Glenn Lesmeister from Hewlett-Packard

We have included a [link](#) for some analysis of the test scores, which we hope you find interesting. Some items of interest to us safety guys...

...46% of the EMC participants correctly identified the FCC logo for the US, whereas the safety participants scored 58% for the same mark.

...the average score for the EMC participants was 3.42, while the safety guys scores an average 6.67.



Product Safety Engineering Society

...SEL's clients performed far above the averages.

Attached is a [link](#) to the Test Key that many of you requested. And for those of you who requested a copy of the test, it is included with the Test Key.

We'd be interested in hearing if other first-time test-takers out there can beat 13 under the same time limit of 60 seconds, in their first try. Don't worry, Steve, we won't ask for the iPod back! This isn't men's gymnastics in the Olympics, after all, so we won't try to "Paul Hamm" you.

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Special points of interest:

- For agency visit dates to SEL and seminar dates, see www.SELdirect.com
- For info between newsletter issues, see our website or call us directly.
- To see our larger facility where SEL has been since early 2002, visit our website for directions (www.seldirect.com/map.html).

Come to the SEL-CKC Open House Luncheon on Thursday, November 11th in Redmond!

SEL will be operating a safety laboratory in Redmond, WA within the facility of our affiliate, CKC Labs. To kick off this effort, we are having an Open House Luncheon on November 11, from 11:30AM to 2:00PM, for introductions and discussions related to safety services, as well as EMC. Please come to meet with us! The luncheon will be held at CKC Labs, at 14797 NE 95th (Quad 95 Building B), Redmond, WA 98052. If you are able to join us for lunch, please contact Michelle Berger at CKC at (425) 883-4757 to RSVP. A map to this location is available by clicking [here](#), and for more details click [here](#).



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OSHA—Rules for the Workplace (continued)

the “speed limit sign” — and particularly 1910 Subchapter S (<http://www.osha-slc.org>), but seeing the multitude of un-Listed products out there, SEL sent a letter to OSHA earlier this year, asking for clarification of the requirements. Click on the following for SEL’s complete letter and OSHA’s formal response: [http://www.seldirect.com/pdf/SEL-OSHA Letters.pdf](http://www.seldirect.com/pdf/SEL-OSHA%20Letters.pdf).

Essentially, the feedback was that NRTL Listing is required for all products used in the workplace, except for products with internal batteries. In the requirements of Subchapter S, there is the requirement that all “electrical equipment” is Listed. Authorities with OSHA confirmed that there is no exemption for products operating at low voltage levels, certain types of products, or equipment used by more trained personnel.

We suspect that some confusion about the OSHA requirements might stem from the low voltage exemptions written into some local ordinances and into the Low Voltage Directive in the European Union.

Adding to the confusion, the European Union in general has requirements that vary based on the product type, where low voltage wireless products must comply with a Directive while wired products might not! And many think that the requirements are what their customers think the requirements are.

There are a multitude of reasons and sources of product safety requirements — local and state requirements, NEC compliance, customer-driven preferences, and liability considerations. For a benign product without liability concerns, without a telecom interface, installed outside of any major city, operating at 12Vdc, used in a home and not a workplace, without OEM customer requirements, NRTL Listing is indeed optional.

US manufacturers should make informed decisions by knowing the “speed limit”, and OSHA requirements for the workplace are often not included in this process. Are you speeding??

Did you know?

Starting on 1/1/2005, Information Technology Equipment shipped into the European Union must comply with an EN60950 Standard more recent than the second edition, regardless of which amendment?

SEL Handouts

For our clients, we offer 2-4 page summaries of those traditional problem areas, including:

- Plastics flammability
- Labeling
- Manuals
- Factory Inspections
- Standards Evolution
- Process Flowchart
- Spacings
- Why Do Product Safety?
- CB Scheme
- CE Mark and the European Union

Useful Websites

For the main PSES website, visit...

<http://www.ieee-pses.org>

SEL posts its agency visit schedule on...

<http://www.SELdirect.com/calendar.htm>

For the OSHA website with the published requirements...

<http://www.osha-slc.gov>

Compliance Tip!

Before explaining the intricacies of product safety to those internally at your company, start with the broad picture by explaining *why* your company is undertaking this endeavor in the first place:

Complying with federal and state laws governing the workplace, per the above.

Complying with local ordinances requiring Listing.

Customer requirements.

Liability considerations.