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Sent: Thursday, March 28, 2019 3:03 PM

To: PSA Department <PSA@ansi.org>

Subject: Proposed Revision to the ANSI Essential Requirements (www.ansi.org/essentialrequirements)

To Whom It May Concern:

After reviewing the Proposed Revision to the ANSI Essential Requirements (EXSC_033_2019), I have several concerns and advise that this proposal be abandoned. As I read the proposal, it is suggesting that "...an ANS shall not include the terms or conditions that are purely commercial in nature...". This includes contractual requirements, proprietary products or the use of particular testing facilities. This proposal would put both the manufacturer and the end users in a precarious position. My main objection would be with regards to not using proprietary products on a specific machine.

Each model that is designed requires compliance to very specific standards for safety. One of the main considerations for an AWP is it's stability under extreme conditions. In order to meet this criteria, each component's mass and center of gravity is carefully engineered to ensure that the machine can meet/exceed the stability requirements set forth by the governing body. If a user, reading the standard, observes that replacement parts do not have to be proprietary to the manufacturer and they replace a part with a generic or competitor part, the machine may no longer be in compliance with the standard and in the worst case scenario, would put the user in an unsafe condition. For example, a Haulotte machine whose basket is damaged during usage is replaced with a competitor's basket. The competitor's basket may be several pounds heavier than the Haulotte basket and the center of gravity may not be in the same location. During normal operation of the AWP, the differences may cause instability of the machine leading to a potentially fatal scenario.

Another example is the use of generic or proprietary decals. If a machine was designed and built with a manual rotate option, decals indicating the load rating for a Haulotte machine show 440# as the limitation. If the decal set on a standard machine or even on a competitor's machine is used, the decal would indicate a load rating of 500#. The additional 60# could potentially cause an unsafe condition for the operator – due to instability of the machine and the extra weight causing an overturning moment. Whereas if the correct manufacturer's decal set for a specific machine is required, the proper safety warnings for operation of the machine would remain intact.

If the proposal were rewritten to indicate that only OEM parts and manuals for the purchased equipment are to be used as replacements, this may be acceptable. This would also satisfy the original assertion that the Standards body not partake in the endorsement of any specific product/manufacturer. But as the proposal is currently written, I would not support this revision.

If you have any questions, please feel free to contact me.

Sincerely,

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