

UTILITY TRUCK EQUIPMENT & PARTS

November 24, 2019

American National Standards Institute
11 West 42nd Street
New York, NY 10036

Ref.: Public Comments – ANSI Essential Requirements, section 3.2 Commercial Terms and Conditions

Gentlemen:

I have reviewed the proposed changes to the ANSI Essential Requirements, section 3.2.2 Endorsement of Products or Services and disagree with the requirement of not specifying the use copyrighted user manuals, labels or licenses.

The manufacturer's user's manuals and safety decals are an important safety item for the equipment operator to be knowledgeable in how to use the equipment in a safe manner. The manuals provided by the manufacturer are typically copyrighted. By the ANS eliminating the requirement for the manufacturer's operator's manual to be on the equipment, a safety issue will be raised. The use of the words "or the equivalent" does not resolve this safety issue.

The most knowledgeable entity for producing the operator manual is the manufacturer, who has the background information as to the design parameters, product/customer research information, and experience with the product. The "or equivalent" manual author does not have access to the proprietary information of the manufacturer, and therefore is likely to produce an operator's manual that is less safe than the OEM's manual.

Who is to determine the equivalency of an alternate sourced operator's manual or safety decal (label)?



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If copyrighted manuals are not to be allowed, does that mean that the ANSI Standards will no longer be copyrighted?

Thank you for allowing me to express my opinions regarding the proposed changes to the ANSI Essential Requirements, section 3.2 Commercial Terms and Conditions.

Please feel free to contact me with any questions or comments.

Respectfully Submitted,



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