

Z87 COMMITTEE

SAFETY STANDARDS FOR EYE PROTECTION

International Safety Equipment Association (Z87 Secretariat)

1901 N. Moore Street, Suite 808• Arlington, VA 22209

703-525-1695 - Phone 703/528-2148 - Fax

isea@safetyequipment.org

July 20, 2010

Mr. Daniel Torgersen
OLA and Z80 Representative to ANSI Z87 Committee
Via Email: DTorgersen@walman.com

Dear Mr. Torgersen:

This correspondence is in response to your request for interpretation (dated May 10, 2010) on Section 6.2.6, Prescription Lens Mounting Qualification of ANSI/ISEA Z87.1-2010. The Committee offers the following official responses to the questions you have posed, as noted below:

Question 1:

Does 6.2.6 allow a [single representative test lens] meeting the requirement of 6.2.5 to be used?

Committee Response:

Testing with a single representative lens type (i.e., lenses of a particular material, coating, thickness and surfacing combination) for a given lens retention system is sufficient to show compliance with Section 6.2.6. It is the manufacturer's responsibility to determine what constitutes a representative lens type for each type of lens retention system offered for sale and if testing with more than one representative lens type is required for a given lens retention system. Similarly, when testing is done with only a single lens type, it is the manufacturer's responsibility to select the representative lens type most likely to fail, and with which the complete device is intended to be sold.

Question 2:

Is each laboratory required to conduct testing identified in 6.2.6 or can the results in one laboratory be extended to other laboratories of the same company?

Daniel Torgersen, Chairman
Tel +1-612-520-6061 Fax +1-612-520-6112
E-mail dtorgersen@walman.com

Jack B. Hirschmann, Jr., Vice-Chairman
Tel +1-800-322-3348 Fax +1-508-999-4443
E-mail jhirschmann@oberoncompany.com

Cristine Z. Fargo, Secretary
Tel +1-703-525-1695 Fax +1-703-528-2148
E-mail cfargo@safetyequipment.org

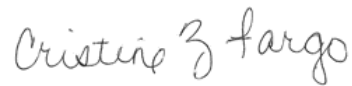
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Committee Response:

It is the manufacturer's responsibility to determine if separate testing is required for each laboratory maintained by the same manufacturer. As specified, type testing shall be performed when any substantive change in production occurs that could affect the ability of the device to pass the qualification tests. It is the manufacturer's responsibility to determine what constitutes a substantive change, be it a change or difference in manufacturing process, materials, location, relevant personnel or equipment, or any combination thereof.

Please do not hesitate to contact me if you have further questions.

Sincerely,

A handwritten signature in cursive script that reads "Cristine Z. Fargo".

Cristine Z. Fargo
Z87 Secretariat Staff

Cc: Z87 Committee