

15 FEB 2011

TSC-4 Interpretation  
Interpretation: 11302010  
Section(s): 4.3.10.1 & 4.5.2

**Response:**

1. It is our opinion that the standard does not state nor “imply that the LCA must have hard barriers (walls).”

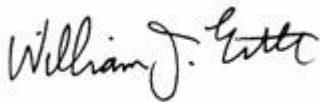
It states that the LCA shall be “controlled”, and this can be attained by any one of several means, one of which could be walls. Alternatively, one could use laser barrier screens or curtains. However, ANY alternate control measure that provides equivalent protection to the requirement for a laser controlled area and does not allow exposure above the MPE would be acceptable.

2. The standard does not specify “how unique or specific the tool must be” intentionally and allows for the use of any tool (such as a key or the common screw driver, etc.). Currently the ANSI and Federal Laser Product Performance Standard (FLPPS) do not define a tool and the only definition we could find is in the current IEC 60825-1. It defines a tool in Section 3.84 as: “A screwdriver, hexagonal key or other object which may be used to operate a screw or similar fixing means”. We agree with this definition.

**Additional Suggestions/Action(s) for committee:**

Consider adding a definition of “Tool” to the standard such as the one in the IEC 60628-1. This topic has been added to the TSC-4 agenda for its next meeting in conjunction with ILSC 2011.

Regards,



Bill Ertle  
Chairman, TSC-4 – Control Measures and Training