



safety glazing certification council

P.O. BOX 9
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MINUTES OF SEVENTY-FIFTH
MEETING OF THE
CERTIFICATION COMMITTEE
OCTOBER 20 and 21, 2005
OFFICES of SCHIFF HARDIN
CHICAGO, IL

Table with columns: Members and Alternates Present, Date and Votes Present (10/20/05, 10/21/05). Rows include AFG Glass, AFG Fabrication, Arch Aluminum & Glass, Cardinal Glass, Consolidated Glass, Guardian Fabrication Inc., Guardian Industries Corp., Guardian Canada Corp, Oldcastle Glass, PDC Glass & Metal, Temperbent Glass, United Glass Corp., and Viracon.

Members by Virtue of Being a Director

Table with columns: Members by Virtue of Being a Director, Date and Votes Present (10/20/05, 10/21/05). Rows include Public Interest with names Bill Nugent, Elaine Rodman, Don Vild, and Peter Weismantle.

Votes 17 17

Guests

Table with columns: Guests, Date and Votes Present (10/20/05, 10/21/05). Rows include Architectural Testing, Inc., Guardian Industries Corp., Intertek Testing, and Stork Testing - Des Moines.

Legal Counsel

Table with columns: Legal Counsel, Date and Votes Present (10/20/05, 10/21/05). Row includes Schiff, Hardin LLP with William M. Hannay.

Administrative Staff

Table with columns: Administrative Staff, Date and Votes Present (10/20/05, 10/21/05). Row includes AMS, Inc. with John Kent.

Persons Present 19 20

10.20.05.1 The meeting was called to order at 1:10 by Chairman Mark Cody and a quorum declared. All present introduced themselves.

10.20.05.2 The minutes of the April 14 and 15, 2005 meeting were reviewed. A motion was made by Rodman/Paschel to approve the minutes as submitted.

Vote: Unanimous Affirmative
Motion Passed

10.20.05.3 **Board of Directors' Report - R. Paschel**

- A. The Board continues to discuss possible approval of "Non-US" Laboratories. Requests for SGCC Lab approval have been received from several off shore test facilities. The Board continues to review this matter, and welcomes any input from the certification committee.
- B. SGCC marketing activity was reviewed. SGCC brochures were distributed at the AIA show earlier this year. Distribution of SGCC Information to CSI members is being considered.

10.20.05.4 **Financial Report – E. Rodman**

(See Attachment #1)

10.20.05.5 **Legal Counsel's Report – W. Hannay**

- A. SGCC Anti-Trust Guidelines were distributed to the group and read out loud (See Attachment #2).
- B. SGCC, a corporation incorporated under the Illinois General Not For Profit Corporation Act, is in good legal standing in the State of Illinois with no pending or threatened litigation.
- C. Certificate of Insurance compliance continues to be pursued. (See Attachment #3)
- D. Two further matters were reviewed with the group; one involving recent CPSC activities and another involving recent legal decisions regarding antitrust compliance in the Glass Industry. (See Attachment #4)

10.20.05.6 **Administrator's Report – J. Kent**

(See Attachment #5)

10.20.05.7 **Quick Action Sub-Committee Report**

There was no activity since the last meeting

This committee is currently comprised of the following positional members:

SGCC President	-	Currently Richard Paschel
SGCC Certification Committee Chair	-	Currently Mark Cody

SGCC Administrative Manager - Currently John Kent
SGCC Public Interest Member - Currently June Willcott

10.20.05.8 ICC Code Changes

(See Attachment #6)

At the last SGCC meeting, building code proposed changes as submitted by GICC were reviewed. SGCC has since communicated with GICC expressing appreciation for the work GICC has done, but indicating that SGCC feels more work is needed in the code to “clarify the need for objective and competent product testing”. To date no response to SGCC’s April 25th, 2005 communication has been received. Further, it was noted that GICC had submitted a proposed change to the building code attempting to eliminate the need to label safety glazing with the thickness of the material. This proposal was initially not accepted by ICC and subsequently further rejected during the public comment phase of the code cycle (see ICC code proposal S210-04/05 (2403.1)).

10.20.05.9 Testing Failure Review

(See Attachment #7)

The data presented was reviewed with particular interest in the difference between participant and inspector selected, and laminated failures. The following data was requested for the next meeting:

- Laminated impact and boil, TTG and TPG failures
- Size tested
- Poured or sheet interlayer
- Thickness of failure tests
- For 34 X 76 failures add inspector vs. participant selected
- Compare failures as a % of participant and inspector selected
- Compare laminated impact and boil, TTG and TPG failures as a % of total LTG, TTG, TPG

10.20.05.10 Implementation of ANSI Z.97.1 2004

(See Attachment #8)

- A. The June 20, 2005 ANSI Z97.1-2004 implementation memo was reviewed with various issues discussed and questions reviewed. Regarding the 2004 version of the ANSI standard superseding prior version, it was noted that 1) a standard is only an ANSI standard if it is maintained and 2) ANSI Z97.1-2004 specifically states “... this standard is a successor standard to the 1994 edition ...”. In reviewing affected SGCC guidelines, a motion was made by Paschel/Carmen to accept the revision to the SGCC guidelines as presented except that guideline T.5 shall be maintained minus the word “Plate”.

Vote: Unanimous Affirmative
Motion Passed

- B. Further to attachment #8, corrections to the ANSI Z97.1-2004 standard were reviewed and discussed. It appears that the dimensions listed at the bottom of page 19 of the

standard are not correct and not consistent with the dimensions as illustrated in figure 2. It was mentioned that when building an impactor frame, if there are ambiguities in the ANSI standard, SGCC would suggest building in accordance with the CPSC standard. Page 21, figure 3, the group did not understand the reference to “<1/8-inch” but generally agreed it most likely should not be there. The Administrator was directed to forward these corrections to the ANSI committee.

- 10.20.05.11 In reviewing the SGCC Certified Products Directory (CPD), discussion was held regarding the manufacturer’s sample logo section of the CPD. After discussion a motion was made by Cody/Rodman to eliminate the logo section of the CPD.

Vote: 14 Affirmative
3 opposed
Motion Passed

- 10.20.05.12 The meeting was recessed at 5:40 pm

- 10.21.05.1 The meeting was reconvened at 8:35 am

- 10.21.05.2 **Review of Guideline T.6 and AG.2**

(See Attachment #9, presented with annotations as discussed during the meeting)

A motion was made by Paschel/Cody to revise guideline T.6 as annotated in attachment #9, and to maintain the wording of guideline AG.2. but to rename the second paragraph as AG.3.

Vote: Unanimous Affirmative
Motion Passed

- 10.21.05.3 **New Guideline L.10 and AG.3/4**

(See Attachment #9)

A motion was made by Paschel/Heron to add new guidelines L.10 and AG.4 as presented.

Vote: Unanimous Affirmative
Motion Passed

- 10.21.05.4 **Comparison of ANSI Z97.1-2004 and CPSC 16 CFR 1201**

(See Attachment #10)

The differences between the two standards were reviewed. The question has been raised:

“If ANSI Z97.1-2004 (Class A) is equal to or more sever than CPSC 16 CFR 1201, might composite testing be reduced to the impacting of 4 samples, and so claiming compliance to ANSI and CPSC?”

After discussion, it was affirmed that there are differences between the 2 standards. For now, it was agreed to maintain current SGCC testing and sample selection protocols.

10.21.05.5 **Quality Assurance Program Requirements**

(See Attachment #11)

At prior meetings it was agreed to work on the further expansion of the 4 current SGCC quality assurance system requirements, and to add a 5th requirement, 5) documentation and retention of product testing records. Two options for this objective were presented in attachment #11. A motion was made by Nugent/Paschel to accept option "A".

Vote: 0 Affirmative
16 Opposed
1 Abstention
Motion Fails

The following subcommittee was given the task to further "Define SGCC QA system requirements":

Kevin Olah - Chair
Bernie Heron
Cliff Monroe
Rick Wright
Don Vild
Tim Moore

10.21.05.6 **Testing Laboratory Status**

(See Attachment #12)

The SGCC Testing Laboratory Status report was reviewed and current requirements for laboratory acceptance discussed. No specific action was determined.

10.21.05.7 **Approval of Non-US Laboratories**

(See Attachment #13)

Several testing laboratories physically located outside of the US have expressed an interest in applying for SGCC testing laboratory approval. This issue has been reviewed at the last several meetings. Concerns over laboratory independence and the ability for SGCC to maintain proper oversight were addressed. There was also concern that laboratories may not be able to develop proficiency if low-test volumes were experienced. After discussion, a motion was made by Carmen/Cody to re-affirm SGCC's position that laboratory testing for SGCC Certification to US specifications ANSI Z97.1-2004 and CPSC 16 CFR 1201 shall be performed by Independent Laboratories physically located within the US.

Vote: 8 Affirmative
3 Opposed
5 Abstentions
Motion Passed

10.21.05.8 **ANSI/CPSC Test Equipment**

(See Attachment #14)

All were reminded that impactor bags (unfilled) are available from SGCC. Several of the SGCC Approved Testing Laboratories can provide assistance with purchase of ANSI Z97.1 and CPSC 16 CFR 1201 test equipment. All licensees were encouraged to develop in house test capabilities.

10.21.05.9 **Old Business**

Relative to new guideline L.10, concern was expressed that acceptance of ANSI Z97.1 weathering data from various sources may be in conflict with SGCC program requirements. The issue was deferred to the Board.

10.21.05.10 **New Business**

Discussion was held regarding SGCC's requirement that a licensee must name SGCC as an "additionally insured" on product liability insurance. A motion was made by Carmen/Cody to recommend to the Board to require all licensees, including licensees from abroad, to name SGCC as additionally insured on product liability insurance by a licensed US insurance company.

Vote: Unanimous Affirmative
Motion Passed

NOTE: Subsequent to the conclusion of this meeting, the Board agreed to put this matter on hold until further review, to include feedback from insurance companies.

10.21.05.11 **Next Meeting**

After discussion it was agreed to recommend to the Board to hold the next meeting in Pittsburgh, PA or Atlanta, GA during the week of April 24th or May 1st 2006.

NOTE: Subsequent to the conclusion of this meeting, the Board agreed to hold the next meeting In Detroit, MI April 27th and 28th, 2006. The meeting will include a tour of a float plant and fabrication facility for the SGCC Public Interest participants on April 26th.

10.21.05.12 The meeting was adjourned by the chair at 11:40 am.

**safety glazing certification council**

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 SACKETS HARBOR, N.Y. 13685
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Annual Financial Comparison Summary

Revenues	2001/2002	2002/2003	2003/2004	2004/2005
Administrative	\$201,037	\$259,563	\$238,383	\$300,770
Testing	\$263,298	\$336,961	\$360,036	\$429,682
Business Account Income	N/A	\$14,168	\$30,959	\$32,585
Interest Income	\$16,595	\$10,960	\$9,276	\$9,057
Total Revenues	\$480,930	\$621,652	\$638,654	\$772,094

Expenses	2001/2002	2002/2003	2003/2004	2004/2005
Administrative	\$201,037	\$259,563	\$238,383	\$300,770
Testing	\$263,298	\$290,445	\$327,036	\$429,682
Accounting	\$3,000	\$3,000	\$3,000	\$3,000
Legal	\$10,664	\$14,999	\$16,832	\$20,160
Board Meetings	\$8,689	\$8,638	\$9,383	\$9,877
Miscellaneous	\$773	\$8,137	\$1,576	(\$163)
Insurance	\$3,560	\$4,450	\$5,340	\$5,607
Web Page	\$4,215	\$309	\$548	\$3,689
Marketing	\$22,356	\$20,215	\$20,592	\$6,783
Total Expenses	\$517,592	\$606,756	\$622,690	\$779,405
Change in Net Assets	(\$36,662)	\$11,896	\$15,964	(\$7,311)
Net Assets	\$129,349	\$141,245	\$157,209	\$149,898

Investments	Interest Rate	Date of Maturity	Current Value as of 10/13/05
#1 First National Bank of Dryden	2.58%	5/28/06	\$73,979.67
#3 National City Bank	2.15%	12/17/05	\$97,725.25
#6 MBNA Investor Services	2.82%	12/11/05	\$52,879.07
#7 Redwood National Bank	2.27%	11/14/06	\$93,971.98
#8 Community Investment Services	2.25%	6/21/06	\$101,869.07

SGCC
Balance Sheet
As of September 30, 2005

	<u>Sep 30, 05</u>
ASSETS	
Current Assets	
Checking/Savings	
1000 · HSBC Checking	7,802.93
1050 · HSBC Savings Acct (1.5% Int.)	15,074.70
1055 · WSB Savings (2.03% Int)	35,119.65
1060 · Investments - CD#1 (2.58% Int.)	73,979.67
1083 · Investments - CD #8 (2.25%)	101,869.07
1084 · Investments - CD #7 (2.27%)	93,971.98
1086 · Investments - CD#3 (2.15% Int)	97,725.25
1089 · Investments - CD #6 (2.82% Int)	52,879.07
Total Checking/Savings	<u>478,422.32</u>
Accounts Receivable	
1100 · Accounts Receivable	7,171.50
Total Accounts Receivable	<u>7,171.50</u>
Total Current Assets	<u>485,593.82</u>
TOTAL ASSETS	<u>485,593.82</u>
LIABILITIES & EQUITY	
Liabilities	
Current Liabilities	
Accounts Payable	
2000 · Accounts Payable	50.00
Total Accounts Payable	<u>50.00</u>
Other Current Liabilities	
2011 · Deferred administrative Inco...	66,239.50
2012 · Deferred Business Acct Inc...	16,245.00
2013 · Deferred testing income	257,946.30
Total Other Current Liabilities	<u>340,430.80</u>
Total Current Liabilities	<u>340,480.80</u>
Total Liabilities	340,480.80
Equity	
3900 · Fund Balance	149,897.74
Net Income	-4,784.72
Total Equity	<u>145,113.02</u>
TOTAL LIABILITIES & EQUITY	<u>485,593.82</u>

SGCC ANTITRUST COMPLIANCE GUIDELINES

A. It is the policy of SGCC to comply fully with the antitrust laws applicable to trade association activities.

B. In furtherance of this policy, all SGCC meetings are attended by SGCC legal counsel, and the SGCC's officers, directors, and Administrator periodically consult with SGCC legal counsel.

C. Each participant in SGCC activities has a responsibility to avoid any improper conduct from an antitrust standpoint. The following guidelines will assist in meeting this responsibility.

1. SGCC meetings are held solely to manage and operate SGCC and its certification program, in accordance with SGCC's corporate purposes, the SGCC Bylaws, and the Certified Products Directory.

2. No participant in SGCC activities, including the certification program and standards development efforts (such as ANSI Z97.1), should attempt to misuse his or her position within SGCC to gain an unfair competitive advantage on behalf of his or her company.

3. To avoid antitrust problems (either civil or criminal), the following legally-sensitive subjects should not be discussed by competitors at or during SGCC meetings:

- a. Future marketing plans of specific competitors;
- b. Any complaints or business plans relating to specific customers, suppliers, geographic markets or products;
- c. Agreements between competitors to allocate markets, customers or products;
- d. Agreements between competitors to refuse to deal with a supplier or a customer;
- e. Purchasing plans or bidding plans (except privately between two parties with a vertical commercial relationship such as supplier and customer); or
- f. Current or future price information and pricing plans, bidding plans, refund or rebate plans, discount plans, credit plans, specific product costs, profit margin information or terms of sale.

Any question regarding the legality of a discussion topic or business practice should be brought to the attention of SGCC legal counsel* or your company's individual legal counsel.

October 2005

* William M. Hannay, Schiff Hardin LLP, 7200 Sears Tower, Chicago, IL 60606; (312) 258-5617; (312) 258-5700 (fax); e-mail: whannay@schiffhardin.com.

Company	Cert. Exp.	Corresp	Update
Guardian Industries/Fab	06/01/06		05/31/05
Haida Safety Glass, Ltd.	10/20/05		10/19/04
Hoffer's (Oldcastle)	09/01/06		09/12/05
Jiangyin Jingcheng High Quality Glass	07/10/06		09/13/05
Laminated Glass Corp. (Oldcastle)	09/01/06		09/12/05
Laurier Glass Ltd.	02/04/06		03/22/05
Mid Ohio Tempering	08/24/05	10/11/05	10/01/04
Milgard Tempering, Inc.	06/30/06		06/28/04
Mirror Crafters Custom Beveling, Inc.	05/30/06		06/07/05
Mirror Factory Inc.	04/01/06		04/12/05
Multiver	12/03/05		08/20/04
Nashville Tempered Glass Corp.	12/01/05		03/31/05
North American Glass Industries, Inc. (Oldcastle)	09/01/06		09/12/05
Oldcastle Glass Group*	09/01/06		09/12/05
Patio Enclosures, Inc.	07/05/06		07/19/05
PDC Glass & Metal Services	08/24/05	10/11/05	10/01/04
PGT Industries	01/01/06		12/29/04
PPG Industries, Inc.	Self-insured		12/04/96
Prelco, Inc.	05/07/05	10/11/05	10/08/04
PT Sinar Rasa Kencana	07/10/05	09/09/05	03/20/05
PT Surya Adhitia Fortuna Glass	07/10/05	09/09/05	09/22/04
PT Tunggal Majuasri Glass	02/11/06		02/24/05
Quaker Window Products	04/01/06		04/18/05
Quality Glass & Mirror Inc.	09/17/06		09/26/05
Republic Windows & Doors, Inc.	02/01/06		02/08/05
Shanghai Yaohua Pilkington Glass Co.	09/28/06		10/11/05
Shaw Glass Co., Inc.	12/31/05		01/12/05
SIGCO, Inc.	08/30/06		09/16/05
Sovis North America	03/01/06		09/13/05
Specialty Building Products	04/01/06		05/31/05
Swift Glass Co., Inc.	01/01/06		09/07/05
Syracuse Glass Co., Inc.	08/06/06		08/30/05
Techni-Glass, Inc.	09/22/06		08/30/05
Tecnoglas	09/12/05	10/11/05	09/21/04
Temperbent Glass	03/01/06		05/19/05
Tempered Glass, Inc.	08/24/05	10/11/05	10/01/04
Tempglass Group, Inc. (Oldcastle)	09/01/06		09/12/05
TRACO (Three Rivers Aluminum)	04/01/06		05/12/05
Triple Seal Ltd.	02/28/06		04/07/05
United Plate Glass Co., Inc.	01/01/06		04/18/05
Unitex Glass Corp.	08/01/06		08/16/05
Vetzeria Valentini S.R.L.	12/31/05		02/11/05
Vidrieria Argentina	04/01/06		05/31/05
Vidrio Saint Gobain de Mexico	07/01/05	09/09/05	10/26/04
Vidrios Lirquen	03/31/05	05/05/05 08/08/05 8/15/05 SGCC	09/23/04
Viracon, Inc.	03/01/06		03/14/05
Virginia Glass Products Corp.	08/01/06		09/12/05
Vitemco - Glasswall LLC	02/01/06		02/28/04
Vitrierie April (Oldcastle)	09/01/06		09/12/05
Westshore Glass	06/01/06		09/09/05

10/19/2005

SGCC Certificates of Insurance

Company	Cert. Exp.	Corresp	Update
ACI Distribution	10/01/05	10/11/05	07/05/05
AFG Industries, Inc.	01/01/05	01/04/05 03/25/05	01/24/04
All Team Glass & Mirror, Ltd.	08/24/05	10/11/05	09/21/04
AMSCO Windows	01/01/06		01/04/05
Anthony International	01/01/06		09/16/05
Arch Aluminum (American Glassmith/Sumiglass)	04/28/06		05/10/05
Berkowitz, J.E.	05/01/06		05/13/05
Bronco Industries, Inc.	05/11/06		08/26/05
Cameron Glass, Inc.	07/01/06		07/12/05
Cardinal IG	10/01/05	10/11/05	10/15/04
Cat I Manufacturing, Inc.	11/08/05		11/15/04
Changshu Hard Glass	07/21/05	09/09/05	07/29/04
Changshu Zhongcheng Building Material Co., Ltd.	04/26/06		09/03/06
Cheil Glass Industrial Co., Inc.	12/10/05		12/21/04
Coastal Glass Distributors	10/01/06		10/01/05
Colonial Mirror & Glass Corp	05/31/06		08/16/05
Commercial Insulating Glass Co.	05/01/06		05/31/05
Consolidated Glass Corporation	11/15/07		12/14/04
Contour Industries, Inc.	01/01/06		12/14/04
Coraglass, Inc.	12/31/05		04/13/05
Craftsman Tempered Glass	08/01/05	10/11/05	01/12/05
Day Specialties Corporation AGC America, Inc.	01/01/06		10/11/05
Desert Glass Products, Inc.	10/25/05		02/09/05
Diubak Corporation	07/07/06		09/16/05
Dong Sung Glass	12/27/05		06/21/05
Dongli Tempered Glass	09/30/05	10/11/05	01/06/05
Downey Glass Industries, LLC	11/08/05		05/05/05
Downey Glass (Oldcastle)	09/01/06		09/12/05
Eckelt Glas GmbH	01/01/05	04/14/04 06/29/04	04/13/04
Edge Seal Technologies	01/07/06		01/18/05
EFCO Corp.	10/01/06		10/04/05
Engineered Glass Products L.L.C.	06/01/06		05/31/05
Florida Laminated and Tempered Glass d/b/a FLT Glass	06/28/06		07/13/05
FTG of NC LLC	12/21/05		12/14/04
Galaxy Glass Corp., Inc.	11/21/04	01/04/05 03/25/05	01/31/04
Gemtron Corp.	09/30/05	10/11/05	11/20/04
GGI Glass Distributors Corp.	01/10/05	03/25/05 08/08/05 8/15/05 SGCC	043/25/04
GIZ Studio, Inc. f/k/a Glass Innovations	07/16/06		07/18/05
Glass Distributors of America (Oldcastle)	09/01/06		09/12/05
Glass Dynamics, Inc.	12/10/05		01/10/05
Glass, Inc.	12/19/05		01/04/05
Goldray, Inc.	05/22/06		09/22/05
Grand Glass Corporation	06/22/06		09/06/05
GSA Armourplate Manufacturing f/k/a PFG Toughened Glass	04/01/05	05/05/05 08/08/05 8/15/05 SGCC	07/25/04

ATTACHMENT #4
FEDERAL APPEALS COURT DECISION IS A REMINDER OF NEED FOR ANTITRUST COMPLIANCE IN THE GLASS INDUSTRY

by
William M. Hannay
Counsel to the Safety Glazing Certification Council

The recent decision by the United States Court of Appeals in Philadelphia in the continuing saga of the Flat Glass Antitrust Litigation is a reminder of the continued importance of antitrust compliance in the glass industry. In its decision, published at 385 F.3d 350 (3d Cir. 2004), the Court held that there was sufficient evidence of a price-fixing conspiracy between several of the largest manufacturers of flat glass in the early 1990s to justify going to trial.

The Court emphasized that firms in highly concentrated industries should carefully limit the dissemination of competitively sensitive pricing information and pricing-related discussions among corporate decision makers. In the Flat Glass case, the court found evidence that such improper information exchanges occurred at a high level of the flat glass producers' structural hierarchy, specifically:

- (1) two board members of one company met with an executive of a competitor between the price increases of the respective companies;
- (2) a regional sales manager of one company was aware of the precise date when a competitor was going to announce a price increase almost three months ahead of time, as well as the precise amount of the increase; and
- (3) soon after the price increases were announced, executives from the various companies attended a trade show at which an executive from one assured an executive from another that his company was "fully supportive of the price increase position."

The Court further found evidence in the case that "the exchanges of information had an impact on pricing decisions." Several key documents emphasized that the relevant price increases were not economically justified or supportable, but required competitors to hold the line. Others suggested not just foreknowledge of a single competitor's pricing plans, but of the plans of multiple competitors. Predictions of price behavior were followed by actual price changes.

The price-fixing allegations first arose in the 1997 criminal trial of the former president and CEO of LOF, who accused his company of conspiring to fix the price of all glass products sold in interstate and foreign commerce. The U.S. Department of Justice launched grand jury investigations of the charges, but no indictments were ever issued. A number of civil antitrust lawsuits were filed by private plaintiffs and eventually consolidated in Philadelphia.

The original defendants included AFG Industries, Inc.; Ford Motor Co.; Guardian Industries Corp.; Libbey-Owens-Ford Co. (owned by Pilkington plc); and PPG Industries, Inc. The plaintiffs reached a settlement with four of the defendants in 2000, but continued the case against the remaining defendant PPG.

Corporations that violate the antitrust laws are subject to criminal fines as well as treble-damages in civil litigation. Company employees that direct or knowingly participate in price-fixing conspiracies are subject to fines and jail terms of up to ten years in prison.

ATTACHMENT #4

From: Hannay, William M. [whannay@schiffhardin.com]
Sent: Wednesday, April 20, 2005 6:45 PM
To: John G. Kent (E-mail)
Subject: SGCC – CPSC action

John – please circulate this memo to the SGCC Board of Directors
Thanks
Bill Hannay

CONSUMER PRODUCT SAFETY COMMISSION ISSUES LARGEST FINES IN HISTORY OF AGENCY

New Initiative To Bring Product Sellers Into Compliance With Reporting Obligations

The Consumer Product Safety Commission (CPSC) has been flexing its regulatory muscles in recent weeks by levying severe fines against companies who have failed to report product hazards on a timely basis. CPSC Chairman Hal Stratton has stated publicly that the recent actions are intended to demonstrate the CPSC's "commitment to protecting American families by holding companies accountable for keeping safety information from us."

The first major fine was publicized on March 22, 2005, when the CPSC issued a press release announcing that Graco Children's Products Inc. was being hit with a \$4 million penalty for the company's failure to promptly provide the CPSC with information about products that posed a danger to children. This was the largest civil penalty levied in CPSC history. The fine resulted from the company's decade-long failure to report defects in a variety of children's products that the CPSC said could create substantial product hazards or unreasonable risks of injury or death to young children.

This was just one of the latest of a series of fines levied by the CPSC. On March 30, 2005, the CPSC announced that Hamilton Beach/Proctor-Silex Inc. had agreed to pay a \$1.2 million civil penalty for failing to promptly report defects in countertop toasters, juice extractors and slow cookers. The company ultimately conducted a voluntary recall of these items, but because the company had received numerous complaints and did not report them to the CPSC in a timely manner, the CPSC still found that the company was subject to the fine.

More recently, on April 12, 2005, the CPSC announced that Bowflex maker Nautilus Inc. had agreed to pay a \$950,000 fine in connection with its failure to report complaints of injuries related to defects in the design of the popular exercise equipment. In the CPSC's press release, Chairman Stratton reiterated: "The recent penalties levied by CPSC send a strong message that failing to report potential hazards is illegal. Companies need to understand that the quicker they report product safety problems to CPSC, the quicker we can take action together and protect consumers from injuries."

These types of fines are being levied by the CPSC with greater regularity and in greater amounts than at any time in the history of the CPSC. By levying such fines, the CPSC has demonstrated its intent to bring manufacturers, distributors and retailers into compliance with the requirements of the Consumer Product Safety Act, and particularly the requirements related to reporting.

Section 15(b) of the Act requires a manufacturer, distributor or retailer to report information about a product to the CPSC if the

company receives information that reasonably supports a conclusion that the product: 1) fails to comply with a regulatory or voluntary consumer product safety standard; 2) contains a defect which could create a substantial product hazard; or 3) creates an unreasonable risk of serious injury or death. A company is also required to report under Section 37 of the Act if a product is the subject of at least three civil actions filed in State or Federal Court, each suit alleges death or grievous bodily injury, and at least three actions resulted in settlement or a judgment for the plaintiff over a two year period. Companies are often confused about whether a defect constitutes a "substantial product hazard."

Section 15(a)(2) of the Act defines "substantial product hazard" as "a product defect which (because of the pattern

ATTACHMENT #4

of defect, the number of defective products distributed in commerce, the severity of the risk, or otherwise) creates a substantial risk of injury to the public." The CPSC's regulations interpreting the Act state that when assessing whether information reasonably supports a conclusion that a product contains a "defect which could create a substantial product hazard," the company should evaluate information known by it such as whether there have been claims for personal injury, complaints from consumers or consumer groups, or requests from other firms (such as retailers) to return or replace the product or provide a credit.

The CPSC encourages reporting when in doubt. CPSC regulations at 16 CFR 1115.4(e) state: "If the subject firm determines that the defect could create a substantial product hazard, the subject firm must report to the Commission. Most defects could present a substantial product hazard if the public is exposed to significant numbers of defective products or if the possible injury is serious or is likely to occur. Since the extent of public exposure and/or the likelihood or seriousness of injury are ordinarily not known at the time a defect first manifests itself, subject firms are urged to report if in doubt as to whether a defect could present a substantial product hazard." Given the recent spate of fines for reporting failures, companies would be wise to heed this advice.

This message and any attachments may contain confidential information protected by the attorney-client or other privilege. If you believe that it has been sent to you in error, please reply to the sender that you received the message in error. Then delete it. Thank you.

ADMINISTRATIVE REPORT**SGCC October Meeting****October 20 & 21, 2005****July 1, 2005 Certified Products Directory (CPD)**

<i>Cut-off Date</i>	<i>Copies</i>	<i>Subscription List Mailing</i>
July 1, 2005	2300	2095

Certification Removed Since Publishing July 1, 2005 CPD**ANSI Program**

None

CPSC Program

None

Composite Program**American Flat Glass Dist., Concord, Canada**

SGCC #1485	1/8-inch	TTG
SGCC #1486	5/32-inch	TTG
SGCC #1945	3/16-inch	TTG
SGCC #1489	1/4-inch	TTG

American Flat Glass Dist. Richmond, VA

SGCC #2867	1/4-inch	TPG
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PDC Glass of Michigan Inc.; Plymouth, MI

SGCC #2223	1/8-inch	TPG
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Certified Products NOT in July 1, 2005 CPD**ANSI Program**

None

CPSC Program

None

Composite Program**Changshu Hard Glass Co, Jiangsu, China**

SGCC #2987	5/32-inch	TTG
SGCC #2988	7/32-inch	TTG

Day Specialties, Midland, Ontario, Canada

SGCC #3067	1/8-inch	TTG
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GGI Glass Distributors, Secaucus, NJ

SGCC #2928	5/32-inch	TTG
------------	-----------	-----

Guardian Fabrication Inc., Webster, MA

SGCC #3024	7/32-inch	TPG
------------	-----------	-----

SGCC #3057	3/16-inch	TTG
SGCC #3058	1/4-inch	TTG
SGCC #3059	3/8-inch	TTG

Haida Safety Glass, Wuxi City, China

SGCC #3036	5/32-inch	TPG
SGCC #3037	3/16-inch	TPG
SGCC #3038	1/4-inch	TPG

PDC Glass of Michigan Inc.; Plymouth, MI

SGCC #3035	1/8-inch	TPG
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Sovis North America, Inc. Madison, GA

SGCC #3027	5/32-inch	TTG
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Techni-Glass Inc.; Surgoinsville, TN

SGCC #2975	1/4-inch	TTG
SGCC #3060	1/4-inch	TPG
SGCC #3061	1/8-inch	TPG
SGCC #3062	3/8-inch	TTG

Viwinco, Inc., Morgantown, PA

SGCC #3074	1/8-inch	TTG
SGCC #3075	5/32-inch	TTG

Zhangjiagang Weiyu Glass, Zhangjiagang China

SGCC #3045	1/8-inch	TTG
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Name Changes

Coraglass, Inc., Tuscaloosa, AL
n/k/a Coral Industries, Tuscaloosa, AL

Changes from ANSI only to Composite**Bronco Industries, Delta BC Canada**

SGCC #2242	1/8-inch	TTG
SGCC #2243	5/32-inch	TTG
SGCC #2244	3/16-inch	TTG
SGCC #2245	1/4-inch	TTG
SGCC #2246	3/8-inch	TTG
SGCC #2247	1/2-inch	TTG

Administrative Activity

June 20, 2005	Mailing of New ANSI 2004 Standard Memo
August 23, 2005	Mailing of Certification Minutes for April 2005 Meeting & October 2005 Meeting Notice
September 22, 2005	Mailing of F06 Lab Fees and Notice of Admin Fee Increase
October 7, 2005	SGCC Mailing of F06 invoices

Requests to become an SGCC® Approved Laboratory

N/A

SGCC Participation Comparison

ATTACHMENT #5

	L04	F05	L05 (AS OF 10/11/05)
No. of Participating Plants	157	164	166
No. of Offshore Plants (Non US & Canada)	24	25	30
No. of Licensees	95	100	102
Total Certified Products	850	867	894
ANSI Only	129	125	121
CPSC Only	58	58	51
COMPOSITE	663	684	722

SGCC Website Report

<u>2005</u>	<u>Total Visitors</u>	<u>Most Visited Section</u>	<u>2nd Most Visited</u>	<u>3rd Most Visited</u>	<u>Downloads of CPD</u>
<u>February</u>	<u>2,347</u>	Who's Certified	Initial Certification Process	Approved Labs	N/A
<u>March</u>	<u>3,187</u>	Who's Certified	Initial Certification Process	Approved Labs	N/A
<u>April</u>	<u>2,752</u>	Who's Certified	Initial Certification Process	Links	367
<u>May</u>	<u>2,986</u>	Who's Certified	About SGCC	Approved Labs	461
<u>June</u>	<u>2,937</u>	Who's Certified	Miscellaneous Forms	Upcoming Meetings	415
<u>July</u>	<u>2,602</u>	Who's Certified	Contact Us	Initial Process	25
<u>August</u>	<u>2,903</u>	Who's Certified	Approved Labs	Initial Process	398
<u>September</u>	<u>2,885</u>	Who's Certified	Miscellaneous Forms	Upcoming Meetings	19



safety glazing certification council

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PHONE 315-646-2234
FAX 315-646-2297

April 25th, 2005

Mr. Michael Fisher
President, Glazing Industry Code Committee
2945 SW Wanamaker Drive, Suite A
Topeka, KS 66614-5321

Re: Recent Approval of Building Code Changes

Dear Mr. Fisher:

The SGCC Board and Certification Committee wishes to thank you for forwarding the results of the Building Code change proposals that the GICC had submitted earlier.

While we agree that your changes more accurately reflect current practices, we still feel the Code as currently written does not clarify the need for objective and competent product testing.

The SGCC feels that the GICC is the appropriate organization to forward this topic, and would encourage and assist in any activity that the GICC may undertake in this regard.

Very truly yours,

SAFETY GLAZING CERTIFICATION COUNCIL

Richard A. Paschel

Richard A. Paschel
President, SGCC

Copy: W.H. Hannay, Esq.
J. Kent - AMS

components, as the name implies. Instead it should apply to any means of egress component meeting the description(s) given and not incorporated into the primary building structure. Likewise, terminology correction is proposed for a similar IRC provision.

Background: The basis for IBC Section 2308.12.7 is 1997 UBC Section 2320.13. It was applicable in Seismic Zones 3 and 4, but otherwise is nearly identical to its IBC counterpart. It is intended to assure that lateral support of certain means of egress components is provided so that they remain functional and safe in the event of an earthquake. A key point that must be understood is that the addition of this provision to the UBC predated the conversion of UBC Chapter 10 to the three part means of egress approach in 1997. Prior to that, the UBC term for means of egress really was "exiting" and the collective term that described the various components was "exit". In other words every means of egress component was considered to be part of the exit. Thus the term exit facility was adequate for that document. In 1987 the transition was made to the three part means of egress in UBC Chapter 10, but this conventional light-frame construction provision went unchanged. UBC Table 16-A Uniform and Concentrated Loads also contained an entry for exit facilities as well (see item 5) and a footnote explained what was included, in effect providing a definition of the term 'exit facility' under the 1997 UBC. So, for the purposes of applying the 1997 UBC, code users could still understand the intent of the phrase, 'exit facility' even though it was no longer accurate.

(Brazil) The purpose of the proposal is editorial: to coordinate the terms for exterior egress balconies and exterior exit stairways used elsewhere in the code with their intended use in IBC Section 2308.12.7 and IRC Sections 311.1 and 311.2.1. The current language originated in a legacy code and in an edition of the code that preceded its transition from provisions for exits to those for means of egress. The term "exterior egress balcony" is used consistently elsewhere in the IBC (see Sections 704.2, 1013.5.1, 1013.5.2 and 1015.3). The proposed revision from "stairs" to "exterior exit stairways" will more accurately specify the original intent, which should include anchorage of the stairway landings as well as the flights of stairs.

Cost Impact: None

PART I - IBC

Committee Action: **Approved as Submitted**

Committee Reason: Agreement with proponent's reason which indicates this proposal provides terminology that is more consistent with other IBC provisions.

Assembly Action: **None**

PART II - IRC

Committee Action: **Disapproved**

Committee Reason: This proposed code change included terminology not currently defined in the IRC including, "Egress Balcony" and "Primary Structure". For this reason the committee stated that the proposed language needed additional work before it could be included in the code text.

Assembly Action: **None**

Individual Consideration Agenda

This item is on the agenda for individual consideration because a public comment was submitted.

Public Comment:

Jonathon C. Siu requests Approval of Part II - IRC as Submitted.

Commenter's Reason: Part II of this proposal (S208-04/05) is an editorial change to the IRC to use terminology that is more consistent

with the I-codes. Part I of this proposal was approved as submitted by the IBC Structural Code Development Committee.

The reasons given by the IRC Building/Energy Code Development Committee state that the terms being proposed are not currently defined in the IRC including "Egress Balcony" and "Primary Structure". We believe that this reasoning is faulty for the following reasons:

1. "Primary Structure" is already in the code (this proposal did not change anything related to that term).
2. This proposal substitutes "egress balconies" for "exit balconies". We would point out that "exit balcony" is not defined in the IRC, either, and using "egress balcony" would be more consistent with IBC terminology.
3. All the other terms being proposed to be used are consistent with the IBC.
4. IRC Section R201.3 reads as follows:

R201.3 Terms defined in other codes. Where terms are not defined in this code such terms shall have meanings ascribed to them as in other code publications of the International Code Council.

Since the proposed terms are defined in the IBC, they are defined for the purposes of the IRC.

S210-04/05 2403.1

Proposed Change as Submitted:

Proponent: William E. Koffel, PE, Koffel Associates, Inc., representing Glazing Industry Code Committee

Revise as follows:

2403.1 Identification. Each pane shall bear the manufacturer's label designating the type and thickness of the glass or glazing material. The identification shall not be omitted unless approved and an affidavit is furnished by the glazing contractor certifying that each light is glazed in accordance with approved construction documents that comply with the provisions of this chapter. Safety glazing shall be identified in accordance with Section 2406.2.

Each pane of tempered glass, except tempered spandrel glass, shall be permanently identified by the manufacturer. The identification label shall be acid etched, sand blasted, ceramic fired, embossed or shall be of a type that once applied cannot be removed without being destroyed.

Tempered spandrel glass shall be provided with a removable paper marking by the manufacturer.

Reason: The thickness of the glass is not necessary to determine code compliance. Where a specific performance is required, such as safety glazing, the manufacturer's mark is required to identify the test standard to which the glass has been tested and that is what is necessary to determine code compliance. Although ANSI Z97.1 previously required the thickness it is not an optional marking and 16 CFR 1201 does now require thickness to be part of the marking.

When replacing glass, a glazing contractor will typically measure the thickness of the glass instead of looking for or relying on the information provided in the manufacturer's designation.

More importantly today is the concern for building security. In August 2004 when the terror alert was raised to orange in certain East Coast cities, it was noted that terrorists had been methodically casing buildings. In order to access the vulnerability of certain buildings, the information collected included the thickness of the glass. Since including the thickness of the glass in the manufacturer's mark is not

necessary for purposes of code enforcement or glass replacement and since the thickness of glass is considered a building security issue, there is no reason to include the information on the glass.

Cost impact: None

Committee Action: Disapproved

Committee Reason: The committee prefers retaining the thickness on the manufacturer's label since it facilitates the inspection process.

Assembly Action: None

Individual Consideration Agenda

This Item is on the agenda for individual consideration because a public comment was submitted.

Public Comment:

William E. Koffel, P.E., Koffel Associates, Inc., representing Glazing Industry Code Committee, requests Approval as Submitted.

Commenter's Reason: The Committee Reason states that the "committee prefers retaining the thickness on the manufacturer's label since it facilitates the inspection process." The Committee identified only one section in the Code in which the thickness of the glass is specifically required (2407.1). All other sections, as well as Section 2407.1, require compliance with a specific test standard and a mark or label on the glass to identify compliance with the standard.

The Committee also heard opposing testimony concerning glass that was marked as complying with a specific test standard although the testifier indicated that it did not. If this is the case, the manufacturer has misrepresented the product and stating a specific thickness will in no way provide the code official with any additional valuable information to determine compliance or noncompliance.

The Committee also heard opposing testimony that the ANSI Z97.1 Standard continued to require the glass thickness to be identified on the glass. This statement was and continues to be an untrue statement. Section 8.1 of the current ANSI Z97.1 Standard contains a note that reads as follows:

NOTE: Additional details and information, such as thickness and date of manufacture, are permitted.

Therefore, the Committee may have based its decision on erroneous and misleading testimony. It should be noted that RB55-04/05 deleted the requirement for including the thickness in the designation from the International Residential Code. The erroneous and misleading testimony was not presented during the IRC Building & Energy Code Development Committee hearing.

With respect to the rationale for approval, not only does the thickness provide minimal benefit to the code official to determine compliance, it also poses a security risk. With the current emphasis on security many buildings are undergoing evaluations to determine points of vulnerability. When the thickness of the glass is specifically identified on the glass, the potential vulnerability posed by the glass can be easily identified by any interested party.

S213-04/05

1714.5.1, 2405.5, Chapter 35; IRC R308.6.9, R613.3, N1102.4.2, Chapter 43; IECC 402.4.2, 802.3.1, Chapter 8

Proposed Change as Submitted:

Proponent: Michael D. Fischer, Window and Door Manufacturer's Association, Chittenango, NY

THIS PROPOSAL IS ON THE AGENDA OF THE IBC STRUCTURAL, IRC BUILDING/ENERGY, AND THE IECC CODE DEVELOPMENT COMMITTEES. SEE THE TENTATIVE HEARING ORDERS FOR THESE COMMITTEES.

PART I - IBC

Revise as follows:

1714.5.1 ~~Aluminum, vinyl and wood~~ Exterior windows and glass doors. Aluminum, vinyl and wood exterior windows and glass doors shall be labeled as conforming to AAMA/WDMA/CSA 101/I.S.2/A440, ~~AAMA/NWWDA 404/I.S.2 or 404/I.S.2/NAFS~~. The label shall state the name of the manufacturer, the approved labeling agency and the product designation as specified in AAMA/WDMA/CSA 101/I.S.2/A440, ~~AAMA/NWWDA 404/I.S.2 or 404/I.S.2/NAFS~~. Products tested and labeled as conforming to AAMA/WDMA/CSA 101/I.S.2/A440, ~~AAMA/NWWDA 404/I.S.2 or 404/I.S.2/NAFS~~ shall not be subject to the requirements of Sections 2403.2 and 2403.3.

2405.5 Unit skylights. Unit skylights shall be tested and labeled as complying with AAMA/WDMA/CSA 101/I.S.2/A440 ~~404/I.S.2/NAFS~~ Voluntary Performance Specification for Windows, Skylights and Glass. The label shall state the name of the manufacturer, the approved labeling agency, the product designation and the performance grade rating as specified in AAMA/WDMA/CSA 101/I.S.2/A440, ~~404/I.S.2/NAFS~~. If the product manufacturer has chosen to have the performance grade of the skylight rated separately for positive and negative design pressure, then the label shall state both performance grade ratings as specified in AAMA/WDMA/CSA 101/I.S.2/A440 ~~404/I.S.2/NAFS~~ and the skylight shall comply with Section 2405.5.2. If the skylight is not rated separately for positive and negative pressure, then the performance grade rating shown on the label shall be the performance grade rating determined in accordance with AAMA/WDMA/CSA 101/I.S.2/A440 ~~404/I.S.2/NAFS~~ for both positive and negative design pressure, and the skylight shall conform to Section 2405.5.1.

CHAPTER 35
REFERENCE STANDARDS

<p>AAMA 404/I.S.2-97</p>	<p>Voluntary Specifications for Aluminum, Vinyl (PVC) and Wood Windows, and Glass Doors 1714.5.1</p>
<p>404/I.S.2/NAFS-02</p>	<p>Voluntary Specifications for Windows, Skylights and Glass Doors 1714.5.1, 2405.5</p>
<p><u>101/I.S.2/A440-04</u></p>	<p><u>Specifications for Windows, Doors and Unit Skylights 1714.5.1, 2405.5</u></p>

Upon review of the data presented, it was re-affirmed that the method of selection did not seem to have a negative effect on test failure rates. It was agreed to continue to evaluate this data. The Administrator was directed to break out tempered vs. laminated failures, and boil vs. impact and to report participant and inspector failures as a percent of total selections and vs. percent of failures.

Discussion continued regarding center-punch testing vs. bag drop testing as it relates to particle size. There was general consensus in the group that a center-punch break will yield larger particles.

**Number of Selections and Failures
(% Total Failure/% Total Products)**

		2000	2001	2002	2003	2004	F05	
Selections	Total	1281	1373	1470	1536	1620	871	
	Participant	925 (72)	755 (55)	627 (43)	365 (24)	682 (42)	296 (34)	
	Inspector	356 (28)	618 (45)	843 (57)	1171 (76)	938 (58)	575 (66)	
	Total Tempered Products						807 (93)	
	Total Laminated Products						64 (7)	
Product Failures	% Total Failures	Total	21 (1.6)	33 (2.4)	26 (1.8)	31 (2)	36 (2.2)	13 (1.5)
		Participant Selected	7 (33/.5)	25 (76/1.8)	21 (81/1.4)	17 (55/1.1)	24 (67/1.5)	7 (54/.8)
		Inspector Selected	14 (67/1.1)	8 (24/.6)	5 (19/.4)	14 (45/.9)	12 (33/.7)	6 (46/.7)
		34x76	20 (95)	30 (91)	23 (88)	16 (52)	25 (69/1.5)	12 (92/1.4)
		Odd Size	1 (5)	3 (9)	3 (12)	14 (45)	6 (17/.4)	0
		16x30			0	1 (3)	5 (14/.3)	1 (8/.1)
Tempered Failures					24 (67/1.5)	10 (77/1.2)		
Laminated Impact Failures					4 (11/.2)	2 (15/.2)		
Laminated Boil Failures					8 (22/.5)	1 (8/.1)		



safety glazing certification council

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June 20, 2005

IMPORTANT SGCC INFORMATION

As you may be aware, the latest version of ANSI Z97.1 (now 2004) was published earlier this year. At the spring SGCC meeting, it was agreed to utilize the new version of ANSI Z97.1 starting in the last of 2005 (L05) certification period. We would recommend obtaining a copy of the new standard for reference if you have not already done so. Copies may be purchased as follows:

Link to on line store: <http://webstore.ansi.org> To purchase by phone: (212) 642-4900

To follow is an explanation of how this will affect SGCC licensees and laboratories:

Effect on Safety Glazing Producers

- All SGCC testing for the L05 certification period will be on 34 X 76-inch samples. This must be done to affirm the unlimited size designation for the new standard.
- The new version of ANSI Z97.1 designates 3 impact classes. SGCC will assume all products are Class A (48-inch, 400 ft-pound impact) unless otherwise directed by the SGCC licensee. YOU MUST LET US KNOW IF YOU WISH TO RATE YOUR PRODUCT(S) AT A RATING OTHER THAN CLASS "A". (Class B = 18-inch, 150 ft-pound impact and Class C is reserved for wired glass only)
- Laminated glass producers will need to provide SGCC with a weathering report.
- Upon completion of testing to the new ANSI Z 97-2004, actual product permanent labels will need to change.

Effect on SGCC Approved Laboratories

- All L05 test samples will be 34 X 76-inches.
- There will be some minor modifications to test equipment.
- There will be some minor modification to the test procedures.
- We are requesting all Lab's provide SGCC with confirmation that they have 1) obtained a copy of the new standard, 2) have made all equipment and procedural modifications, and 3) have trained personnel on the new standard. Please provide to SGCC before July 30, 2005.

Implementation Schedule

<u>SGCC Certification Period</u>	<u>Test</u>	<u>Labeling</u>
First Half 2005 (F05)	1984	1984
Last Half 2005 (L05)	2004	1984
First Half 2006 (F06)	2004	2004

Note:

- 1) Testing to the ANSI Z97.1 1984/1994 version of the standard will not be considered equivalent to the 2004 version.
- 2) L05 testing to ANSI Z97.1 – 2004 shall be on 34 x 76-inch sample for companies wishing an unlimited size designation.

Changes to SGCC Label

ANSI Z97.1-2004 requires the following label information:

1. Supplier's name or mark
2. "ANSI Z97.1-2004"
3. Test Size (U or L), and Drop Height Class (A, B, C)
4. Place of fabrication (If more than one plant)

Typical SGCC Label	<u>Z97.1-84</u>	<u>Z97.1-04</u>
	ABC Glass	ABC Glass – Plant A
	16 CFR 1201-II	16 CFR 1201 – II
	ANSI Z97.1-1984	ANSI Z97.1 – 2004
	1/4U SGCC-9999	1/4UA SGCC-9999

Note:

- 1) Labeling of product to ANSI Z97.1-2004 should not occur until 2004 version testing has passed.
- 2) SGCC labeling requirements are minimum requirements for SGCC. Other jurisdictions, standards and codes may have additional requirements.
- 3) The SGCC number could be used to identify both the "Supplier" and "Place of fabrication".

Changes in Test Procedure/Equipment

1. Weathering test for laminated, and multiple options for weathering test
2. Test to Impact Class section 5.1.2.1
3. Shims for testing
4. Section 5.1.1 (5) Traction/release system to have means to "Rotate" the impactor
5. Some variation in Procedure, section 5.1.3 (Must test to impact class)
6. Some variation in interpretation of results, section 5.1.4
7. More clear direction for testing "bent" products.

Laminated Glass

From ANSI Z97.1-2004 – "Weathering tests on laminated and organic coated glasses shall be performed on the thinnest construction of all components in clear glass with clear plastics by either the laminate fabricator or the manufacturer of the interlayer or plastic glazing sheet material."

Per Spring 2005 SGCC meeting:

For SGCC certification, weathering tests for laminated glass per ANSI Z97.1-2004 shall only be required initially. Weathering data will be accepted from the laminated glass fabricator, or a supplier, i.e interlayer manufacturer.

Thank you for your attention to this matter. If you have any questions, please feel free to contact us any time and as always, thank you for your support of the SGCC Certification process.

Best regards,

John G. Kent

John G. Kent
SGCC Administrative Manager

Does ANSI Z97.1-2004 supersede prior versions of the ANSI Standard?

Hello – A standard can exist apart from its designation as an ANS. However, a standard is only a current ANS (and can only be promoted as such) if it is maintained actively in accordance with ANSI's requirements. ANSI cannot bar anyone from making available or using outdated reference documents, but those documents should not be referred to as current ANS.

Hope this helps,
Anne

Anne Caldas
Director, Procedures and Standards Administration
American National Standards Institute - ANSI
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John, thanks for your note. The 2004 standard says, This American National Standard may be revised or withdrawn at any time. ...Purchases of American National Standards may receive current information on all standards by calling or writing the American National Standards Institute. So it is up to the user to buy the most current version of the standard if that is what is desired (some people need older versions to meet older specs or requirements). In the forward we say, This standard is a successor standard to the 1994 edition. The 1994 standard was a reaffirmation of the 1984 standard with various editorial changes and the 1984 standard succeeded those of the 1975, 1972 and 1966 editions." It would be up to SGCC (for example) to say that you are now updating your requirements to follow the 2004 version of the standard.

You have done this--and I like your information sheet mention of changes from the 1984 to the 2004 standards.

Regards,
Val

Changes to SGCC Guidelines as a Result of ANSI Z97.1-2004 and Corrections to Z97.1

G.3 (ANSI ONLY)

Paragraph (1) Section 5.1.3.4 of ANSI Z97.1-1984 2004 is intended to apply to laminated, wired, and organic coated glass only. Paragraph (2) is intended to apply to tempered glass only. Paragraph (3) is intended to apply to plastics only. Paragraph (4) is intended to apply to any safety glazing material. Paragraph (5) is intended to apply to plastics. Paragraph (6) is intended to apply to laminated and organic coated glass.

G.6 e) ~~As of July 1, 1985, Effective with the first of 2006 (F06) certification period~~ the SGCC® permanent label must contain ANSI Z97.1-1984 2004 in order to be considered a correct permanent label for purposes of Guideline G.6.

G.7 (ANSI ONLY)

Safety glazing materials for which certification is requested for indoor use only shall be subjected to the provisions of section 5.1 (impact tests) and 5.4 (aging tests) of ANSI Z97.1-1984 2004 irrespective of the composition or construction of the glazing material. Like products and materials produced in the same manner as samples submitted for test shall be legibly and permanently marked in one corner with the words "Indoor Use Only" and the SGCC® identification number.

G.8 a) (ANSI ONLY)

After initial compliance with a sample size as stated in Paragraph 4.3, testing of other sizes which represent the sizes manufactured may be allowed, provided, however, that all sizes produced up to the size provided by Paragraph 4.3, ANSI Z97.1-1984 2004 are exposed to selection for testing.

G.22 b) The Administrator of the certification program is provided with a copy of a prototype test from an approved laboratory, showing satisfactory compliance with the impact requirements of ANSI Z97.1-1984 and/or 16 CFR 1201 for each alternate pattern proposed.

G.25 (ANSI ONLY)

~~When a licensee specifically and voluntarily desires to use a SGCC® permanent label on their product that denotes compliance with ANSI Z97.1-1966, ANSI Z97.1-1972, ANSI Z97.1-1975, and ANSI Z97.1-1984 or combination thereof, that they notify SGCC® in writing of the certified item that they desire to so mark. SGCC® will, at the request of the licensee, conduct compliance tests to ANSI Z97.1-1966, ANSI Z97.1-1972, ANSI Z97.1-1975 and ANSI Z97.1-1984 or combination thereof. A single set of four test specimens will be impacted to determine impact test requirements of all standards. Upon successful completion of compliance tests the safety glazing materials are permanently labeled and listed in the SGCC® certified products directory as having met the requirements of 1966, 1972, 1975 and 1984 versions or combination thereof the ANSI Z97.1 standard. The licensee shall pay any costs involved. Effective with the first of 2006 (F06) certification period, SGCC shall only offer certification to ANSI Z97.1-2004.~~

T.5

~~Certification of any nominal thickness of tempered safety plate, float, or sheet glass will also cover the other two types. ANSI Z97.1-1984 and 16 CFR 1201 do not require the permanent label on tempered safety glass to specify which type of glass is used. Nor is it required that the test specimens be identified in this regard.~~

W.1 d) SGCC® has been presented with a test report indicating compliance of the candidate glass with the impact test requirements of ANSI Z97.1-1984.

PE. 2

Certification of plastics for exterior use shall be permitted prior to completion of ANSI Z97.1-1984 weathering tests (paragraph 5.3) provided that a considered expert opinion states that the infrared spectrogram indicates that the plastic is an acrylic or UV, inhibited polycarbonate of proven weatherability. Certification shall be removed if compliance with the weathering test is not demonstrated within six months of the certification date.

PI.1

Sheet plastics used in indoor applications only do not have to comply with paragraph 5.3 of ANSI Z97.1-1984 (UV Weathering), but must comply with paragraph 5.4.

LG.1 b) The Administrator of the Certification Program is provided with a copy of a prototype test from an approved laboratory, showing satisfactory compliance with the impact requirements of ANSI Z97.1-1984 for each alternate pattern proposed.

LG.2 b) The Administrator of the Certification Program is provided with a copy of a prototype test from an approved laboratory, showing satisfactory compliance with the impact requirements of ANSI Z97.1-1984 for each alternate size diamond proposed.

Possible Correction to Z97.1-2004

1. Page iv – “(This forward is not part of ANSI z97-1-20034)
2. Page 18 – 5.1.1(1) The dimensions of the main frame (3x5x1/4-inch steel angle) are consistent with CPSC 16 CFR 1201, but have been suggested to be greater than the “C4 X 7.25, moment of inertia of 4.5 in⁴” as reference in ANSI Z97.1-1984 (R1994). Additionally, the internal dimensions as stated in this section do not appear to be correct when compared to Figure 2.
3. Page 20, Figure 2 – Very difficult to read, is reference to smaller than 34 X 76 inch correct?
4. Page 21, Figure 3 – Drawing appears to address smaller than 34 X 76-inch samples, but the reported dimensions do not seem to support this. Additionally, what is reference to “>1/8 inch” as title?
5. Page 22, Figure 3.3 – Section C-C, Tube steel is shown in the drawing while par 5.1(1) references angle. Also, the addition of the extra member between the main frame and wood frame is confusing unless describing smaller than 34 X 76-inch samples.
6. Page 24, 5.1.1(4) – Impact centerline is 60 inches (~~152.4~~ 1,524 mm)
7. Page 33, 6.1 (2) – “American National Standard Z97.1-2003 4” or the characters “ANSI Z97.1-2003 4”

SGCC Guidelines

T.6

Bent Glass shall be certified separately from flat glass. Bent glass test methods shall be the same as for flat sample testing except as referenced in the text and figures of the ANSI Z97.1-2004 standard. Interpretation of results shall be the same. (Revised 10/21/05)

AG .2

The SGCC® authorized permanent label, which complies with Guideline G.26, must be imprinted upon or applied to a surface of the plastic for all plastic coated annealed glasses.

AG .3 (ANSI ONLY)

Prototype test shall be conducted on bent specimens of the surface area at least 50 percent of the maximum size for which certification is desired. Routine tests may be conducted on flat or bent specimens. The test apparatus shall be modified to clamp the vertical straight edges and to support the concave side for the curved edges. Two specimens shall have organic coating on the concave surface and two on the convex surface. Impact shall be on the convex surface.

New Guideline L.10

L.10

For certification to ANSI Z97.1-2004, weathering tests on laminated glasses shall be performed on the thinnest construction of all components in clear glass with clear plastics. Weathering tests shall only be required initially. Weathering data will be accepted from the glass fabricator, or a supplier, i.e. interlayer manufacturer.

New Guideline AG.4

AG .4

For certification to ANSI Z97.1-2004, weathering tests on organic coated glasses shall be performed on the thinnest construction of all components in clear glass with clear plastics. Weathering tests shall only be required initially. Weathering data will be accepted from the glass fabricator, or a supplier, i.e. organic coating manufacturer.

Comparison of Safety Glazing Testing Standards

Test Standard	ANSI Z97.1-2004	CPSC 16 CFR 1201
Products Covered	Safety Glazing, also address "Bent" products and plastics	Safety Glazing, does not speak to plastics
Sponsor Organization	ANSI	US Government, Consumer Product Safety Commission (CPSC).
Class/Category/Type	U=Unlimited Size L=Limited Size Drop height class A,B,C	Cat I = 18 inch drop < 9ft2 Cat II = 48 inch drop
Method of Impact Test	Single impact at designated Category	Single impact at designated Category
Boil Test	Yes- Laminated Glass	Yes-Laminated Glass
Weathering Tests	Yes-Laminated, OCG, Plastic	Yes-OCG
# Specimens Required for Impact	4 – if asymmetric material, 2 shall be impacted from each side	Not specified, except for non-symmetrical construction, an equal number shall be impacted on each surface
Test Sample Size	U=34X76-inches L= < 34X76-inches, min 24 X30	Largest manufactured, up to 34X76-inches
Impact Test Procedure Differences	1) Rotation and pummel of impactor 2) Laminated glass may be evaluated in the vertical	
Acceptance Criteria	1) No opening > 3 inches with horizontally applied 4# force or less 2) 10 largest particles < equal weight of 10 in2 3) Plastic hardness 4) No Break, remains in frame 5) No Break, separates from frame 6) Separates from frame but meets 1) and 2) above	1) No opening which allows 3-inch / 4# sphere to pass horizontally applied 2) 10 largest particles < equal weight of 10 in2 3) Does not remain in subframe and no break 4) No Break
Impactor Frame	Intended to be the same as CPSC (suggested that 04 version requires a more ridged frame than the 84/94 version of Z97)	3 X 5 X ¼ steel angle or ≥
Frame Shims	Yes	Yes
Sub-Frame	Does not need to be removable	Must be removable
Sample Clamping or Compression	≤15% compression	Between 10 and 15%
Impactor Bag	100# +/- 4oz Lead shot filled leather bag, taped, bladder in place	100# +/- 4oz Lead shot filled leather bag, taped, bladder in place
Covering of Impactor	Terry cloth towel	None

Question proposed to SGCC – If ANSI Z97.1-2004 (Class A) is equal to or more severe than CPSC 16 CFR 1201, might composite testing be reduced to the impacting of 4 samples, and so claiming compliance to ANSI and CPSC? Currently composite testing requires 4 samples tested to ANSI and 1 or 2 samples tested to CPSC.

QUALITY ASSURANCE PROGRAM

SGCC® requires licensees to have a working quality assurance program for the fabrication of safety glazing. Compliance to quality assurance requirements will be validated at the first plant inspection after products are certified. Adherence is verified during twice per year plant visits. These requirements were adopted to improve the overall quality of safety glazing products in the program. A licensee's quality assurance program, as a minimum, must have the following elements:

Option A (ISO 9000 wording)

- a) A Quality Manual – The licensee shall establish and maintain a quality manual that 1) identifies the processes needed for the quality management system, 2) determines the sequence and interaction of these processes, 3) determine criteria and methods needed to ensure that both the operation and control of these processes are effective, 4) ensure the availability of resources and information necessary to support the operation and monitoring of these processes, 5) monitor, measure and analyze these processes, 6) implement actions necessary to achieve planned results and continual improvement of these processes
- b) A designated point of contact – Top management shall appoint a representative who, irrespective of other responsibilities, shall have responsibility and authority that includes, 1) ensuring that processes needed for the quality management system are established, implemented and maintained, 2) reporting to top management on the performance of the quality management system, 3) ensuring the promotion of awareness of customer requirements throughout the organization
- c) Written procedures – documents needed by the organization to ensure the effective planning, operation and control of the processes
- d) Regular production product testing –The licensee shall plan and implement the monitoring, measurement, analysis and improvement processes needed to demonstrate conformity of the product
- e) Documentation and retention of product testing records – A documented procedure shall be established to define the controls needed for the identification, storage, protection, retrieval, retention time and disposition of records

Option B (General Wording)

- a) **A Quality Manual** – Any quality system should have a single document location or "manual" that identifies, describes and contains the workings of the system. There may be different volumes or sections of a manual in different locations, or assigned to various people, but somewhere there should be a master copy of all information, references, forms, policies and procedures.
- b) **A designated point of contact** - Although it goes without saying, all plant personnel are responsible for quality products, one person should be designated responsible for adherence and organization of the QA manual and system. All personnel should know whom to contact if they have questions or comments
- c) **Written procedures** - Some form of written guidelines, instructions, checks or procedures should exist for the fabrication process. As a minimum, each key area of fabrication should be covered. These procedures may vary from a paragraph to pages, but the key elements of the process should be documented.
- d) **Regular production product testing** - How do you know fabricated products meet acceptable requirements and standards on a regular basis? Some form of production level routine check, inspection, test, or monitoring shall be implemented to prove out consistency of production
- e) **Documentation and retention of product testing records**- A documented procedure shall be established to define the controls needed for the identification, storage, protection, retrieval, retention time and disposition of records

SGCC Testing Laboratory Status

5. *Laboratory agrees that initial approval by the SGCC Certification Committee is contingent upon an initial survey of Laboratory's test facilities by the SGCC. Laboratory agrees to pay the cost of the initial survey and inspection of the testing facilities. Ongoing laboratory approval is subject to approval by the SGCC Certification Committee and shall be for a period of two (2) years. During this period the laboratories facilities shall be re-surveyed and all issues arising from this survey resolved. A fee of \$1000 annually for each facility shall be charged for SGCC Laboratory approval and surveys. This fee shall be waived under the following conditions:*

1. *During the first 2 calendar years of initial SGCC Lab approval.*
2. *When 5 or more SGCC participating plants have selected the facility as their designated testing laboratory for that year.*

7. *Approval as an SGCC Approved Testing Laboratory may be removed for failure to adhere to any of the above provisions or failure to pay any outstanding fees older than 60 days.*

Company	Location	Date of Initial Approval	Date of Last Inspection	Approved by SGCC	Signed Agreement	Current year lab fee PAID
Architectural Testing Inc.	St. Paul, MN	10/6/92	Tent 11/8/05	4/14/05	9/9/04	
Architectural Testing Inc.	York, PA	6/30/85	5/2/05	4/14/05	10/26/04	
Architectural Testing Inc.	Fresno, CA	11/18/97	4/20/05	4/14/05	9/9/04	
Architectural Testing Inc.	Southlake, TX	7/1/04	6/15/04	4/14/05	6/25/04	
Bowser-Morner, Inc.	Dayton, OH	1991	4/21/04	4/14/05	1/19/90	
Construction Consulting Laboratory West	Ontario Canada	11/19/97	4/19/05	4/14/05	9/7/04	
ETC Laboratories	Rochester, NY	3/8/94	10/13/05	4/14/05	7/30/04	
Fenestration Testing Laboratories	Hialeah, FL	10/2/97	4/13/05	4/14/05	10/22/04	
Intertek	Duluth, GA	1989	4/10/03	4/14/05	3/9/90	
Intertek	Cortland, NY	1981	6/22/04	4/14/05	6/23/04	
Intertek	Middleton, WI	1992	4/6/01		9/21/04	\$1000
Quality Testing, (Formerly Performance Testing, Inc.)	Everett, WA	10/14/97	8/11/04	4/14/05	1/2/90	
Rone Engineers, Ltd.	Dallas, TX	3/31/00	6/15/04	4/14/05	7/14/04	\$1000
Stork-Patzig Testing Laboratories	Des Moines, IA	6/11/99	5/13/05	4/14/05	4/4/05	
Stork-Southwestern Laboratories	Houston, TX	1/15/90	6/16/04	4/14/05	7/15/04	



safety glazing certification council

P.O. BOX 9
HENDERSON HARBOR, N. Y. 13661
PHONE 315-646-2234
FAX 315-646-2297

April 25, 2005

Mr. Charles Cao
SINO USA INTERNATIONAL CORP
Agent for CNLSG
611 Forest Hill Dr.
Coppell, TX 75019

Subject: Your Request for CNLSG Laboratory Certification

Dear Mr. Cao:

At the SGCC's meeting earlier this month in Tampa, the credentials of CHINA LAB for SAFETY GLAZING were reviewed and your request on their behalf for SGCC Laboratory Certification was discussed.

While we found the credentials of CNLSG to be quite impressive, the SGCC has decided at this time that laboratory testing for SGCC Certification to U.S. Specifications ANSI Z.91.1 and CPSC 16CFR 1201 should be performed by laboratories physically located within the United States.

However, the SGCC Certification Committee and Board of Directors indicated that they would review this topic periodically, and should there be a change in the SGCC's position on this matter, we would inform you accordingly.

Very truly yours,
SAFETY GLASS CERTIFICATION COUNCIL

Richard A. Paschel

Richard A. Paschel
President

Copy: W.H. Hannay, Esq.
J. Kent - AMS

AMS Staff

From: jjyang [jjyang@csgc.org.cn]
Sent: Tuesday, April 26, 2005 2:51 AM
To: AMS Staff; Charlie Cao; John Kent; richard.paschel@temperbent.com;
whannay@schiffhardin.com; mark_cody@afg.com
Subject: Application for Oversea Lab
Attachments: AMECA.JPG; AMECA_OLD.PDF; AMECA_B.PDF; AMECA_OLDB.PDF



AMECA.JPG (1 MB)

AMECA_OLD.PDF
(32 KB)AMECA_B.PDF (63
KB)AMECA_OLDB.PDF
(76 KB)

Dear Mr. Kent,

I am sorry to receive this note, for I think being SGCC accredited lab is beneficial for both SGCC and my lab, and for Chinese manufacturers too, because it cuts the cost on shipping and save the time as well. Acutally my lab has long been the accredited lab for testing auto glass by American Manufacturers Equipment Compliance Agency(AMECA) based in Washington DC since 1989. Attached you will find the PDF files indicating our status, showing past accreditation and latest accreditation. You might also notice the names are different, actually they are the same organization, using different names.

I wish SGCC board of directors review our request periodically and let us know any change you may have on this matter. Thank you very much!

Best regards,

Jianjun Yang-director of China Safety Glass Certification Center
Director of China National Safety Glass Test Lab

-----□□□□-----

□□□: AMS Staff [mailto:staff@amscert.com]

□□□□: 2005□4□26□ 6:26

□□□: Charlie Cao; John Kent; richard.paschel@temperbent.com;
whannay@schiffhardin.com; mark_cody@afg.com

□□: jjyang@csgc.org.cn

□□: RE: Application for Oversea Lab

In response to your below earlier e-mail, attached please find a letter from SGCC regarding recent discussions. If I may help explain or clarify, please do not hesitate to contact us any time.

Best regards,

John G. Kent
Administrative Manager
P: 315-646-2234
F: 315-646-2297

-----Original Message-----

From: Charlie Cao [mailto:ycao@msn.com]
Sent: Monday, January 03, 2005 4:13 PM

AMECA

AUTOMOTIVE MANUFACTURERS
EQUIPMENT COMPLIANCE AGENCY, INC.

P.O. BOX 76860 • NATIONAL CAPITOL STATION • WASHINGTON, D.C. 20013-6960

Certificate of Accreditation

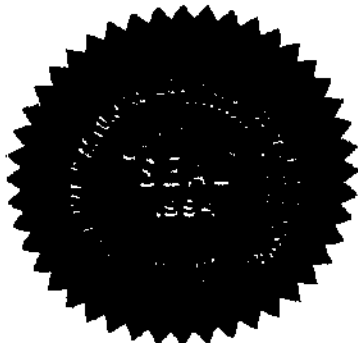
THIS CERTIFIES THAT AN AMECA CERTIFICATE OF LABORATORY ACCREDITATION HAS BEEN
ISSUED TO:

CHINA SAFETY GLASS CERTIFICATION CENTER
CHINA BUILDING MATERIALS ACADEMY
GUANZHUANG, BEIJING, P.R. CHINA 100024

This accreditation is based on a satisfactory on-site inspection and compliance with all the AMECA
Laboratory Requirements. On the basis of this accreditation, AMECA recognizes test reports from this
laboratory performed on devices indicated on the list shown on the reverse side of this certificate.

DATE ACCREDITED: JANUARY 19, 2004

DATE OF EXPIRATION: JANUARY 19, 2008



A handwritten signature in black ink, appearing to read "Ka Vallon".

Executive Director

ANSI/CPSC Test Equipment

Laboratory	Location	Equipment available for purchase
ATI	St. Paul, MN	See ATI York
ATI	York, PA	Impactor frames and bags – contact Scott Swaltek
ATI	Fresno, CA	See ATI York
ATI	Southlake, TX	See ATI York
Bowser-Morner, Inc.	Dayton, OH	No
Construction Consulting Laboratory	Ontario, CA	No
ETC Laboratories	Rochester, NY	Entire test frame
Fenestration Testing	Hialeah, FL	No
Intertek	Duluth, GA	Assistance can be provided
Intertek	Cortland, NY	Impact ball only
Intertek	Middleton, WI	See Intertek Cortland
Quality Testing	Everett, WA	No
Rone Engineers	Dallas, TX	Impact frame – two weeks notice
Stork	Des Moines, IA	Haven't in past, but would