UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

In the matter of	)	
DAISY MANUFACTURING COMPANY 400 West Stribling Drive Rogers, Arkansas 72756	)	CPSC Docket No.: 02-2
Respondent.	)	

CONSENT AGREEMENT AND ORDER

1. This Consent Agreement and Order is a settlement proposal by Daisy Manufacturing Company (hereinafter "Respondent" or "Daisy") pursuant to provisions set forth in 16 C.F.R. §1025.26. It proposes a compromise resolution of the matter described herein, without a hearing or a determination of issues of law and fact.

2. Respondent Daisy Manufacturing Company is a corporation organized and existing under the laws of the State of Delaware. Its office is located at 400 West Stribling Drive, Rogers, Arkansas 72756. Respondent is a manufacturer of Daisy brand airguns and Powerline airguns.

THE COMPLAINT

3. A description of the alleged hazards, as set forth in the Complaint is attached hereto as **Exhibit A.**

THE POSITION OF RESPONDENT

4. Respondent denies all of the staff's allegations as set forth in the Complaint as set forth in the Answer attached hereto as **Exhibit B.**

5. Respondent denies that the airguns described in the Complaint contain a defect which creates or could create a substantial product hazard under Section 15 of the CPSA, 15 U.S.C. §2064 and Section 15 of the FHSA, 15 U.S.C. §1274.

THE PROPOSED SETTLEMENT

6. Respondent admits all of the jurisdictional facts as set forth in the Complaint herein.

7. Upon final acceptance of this Consent Agreement by the Commission and the issuance of the Final Order herein, Respondent knowingly, voluntarily and expressly waives any rights it may have in this matter (1) to an administrative or judicial hearing, (2) to judicial review or other challenge or contest of the validity of the Commission's actions, (3) to a determination by the Commission as to whether Respondent failed to comply with the CPSA and FHSA, as alleged, (4) to a statement of findings of fact and conclusions of law, and all further procedural steps and all rights to seek judicial review or otherwise to contest the validity of the Commission Order approving this Consent Agreement and (5) to any claims under the Equal Access to Justice Act.

8. The allegations of the Complaint herein are resolved by this settlement consisting of a Consent Agreement and Order.

9. This Consent Agreement is entered into for settlement purposes only and does not constitute an admission by Respondent or a determination by the Commission, and settles any claim raised in the Complaint by the Commission under Section 15(a) and (d) of the CPSA, and under Section 15 of the FHSA.

10. Upon provisional acceptance of this Consent Agreement and Order by the Commission, this Consent Agreement and Order shall be placed on the public record and shall

be published in the Federal Register in accordance with the procedures set forth in 16 C.F.R. §1115.20(f).

11. The Commission and Respondent propose to take the following action to settle this proceeding:

A. The following issues raised by the Complaint in this proceeding, namely:

i) The possibility of uniform industry standards for loading and feeding of BB's in all multishot airguns to insure that an airgun, when operated in accordance with the manufacturer's operating instructions, will load, feed or fire properly.

ii) What is the appropriate age for intended users of airguns that fire projectiles at more than 350 feet per second? (The parties recognize that the present standard is 16 years of age.)

shall be submitted for resolution to ASTM Subcommittee F15.06 for the purpose of consideration and determination, in the sole discretion of the Subcommittee, of the extent to which, if at all, they shall be addressed in the voluntary standards ASTM F589 and F590.

The remaining allegations in the Complaint are withdrawn and resolved.

B. Respondent will undertake an intensive campaign to instruct users in the safe handling and use of its airguns, at its sole cost and expense during each of the next five (5) years, under the title "Take Aim At Safety". The campaign will include:

i) a comprehensive media advertising effort titled "Take Aim At Safety". It will be conducted in each year, which began in 2002/2003, for five (5) years, at a cost to Respondent of in excess of $300,000 per year, for a total of $1,500,000. The campaign is described in detail in **Exhibit C** annexed hereto.

ii) Daisy will promote safety by the publication and distribution of ten important safety rules, which, if followed, would eliminate every incident,

injury or death associated with Daisy's high velocity airguns. Consumers will be encouraged to visit Daisy's website to learn Daisy's ten shooting safety rules and earn a safety certificate. They will be eligible to enter a contest to win a VIP tour of the USA Shooting Team Training facility in Colorado Springs, Colorado, annexed as **Exhibit D.** Each participant will receive a free copy of Daisy's shooting safety rules.

iii) A sample ad, to be placed in trade and consumer publications, is annexed as **Exhibit E.**

iv) Respondent will apply a "Take Aim At Safety" label to the face of all Daisy brand and Powerline brand long gun packaging. The objectives, audiences, and strategies of the media and packaging campaign to be conducted by Respondent is broadly outlined in **Exhibit F.**

v) In February 2004 and in each of the four succeeding years thereafter, Daisy will advise the U.S. Consumer Product Safety Commission in writing of the extent to which the Daisy "Take Aim At Safety" campaign was conducted for the preceding year in the same detail as above set forth.

(vi) Manufacture Respondent agrees to manufacture the Model 856 Powerline Airgun with the same single pellet ammunition and feed system as currently being manufactured.

vii) Tape Around Airgun Boxes Respondent will incorporate a tape band 1½ to 2 inches wide around the Model 856 and 880 gun boxes which will have a repeating message on the pre-printed tape, which will include the "Take Aim at Safety" logo and state:

"**WARNING:** This Gun is for Ages 16 and Over. Adult Supervision Required. Careless Use or Misuse of this Gun May Kill Someone"

The tape would have to be cut through, in addition to industrial staples to open the box. This would increase the likelihood that the consumer reads the warning.

viii) Hang Tag, Zip Tie or Sticker A zip tie is placed over the pumping mechanism of the gun, which must be cut through to use the gun. A hang tag will be attached to the zip tie and will state:

WARNING: Always treat this gun as if it is loaded, whether you think it is loaded or not. Even if the gun fails to fire a BB or pellet one or more times, do not assume it is unloaded. Any

airgun may fail to fire for a variety of reasons. Never point the gun in an unsafe direction or at another person.

In lieu of a zip tie or hang tag, a sticker may be placed on the product featuring the same warning.

ix) Poster, Sticker, Counter Card, or Video for Retailers For a period of five (5) years, an 8½ X 11 poster, sticker, counter card or video will be sent to retailers for posting during the Christmas season. The poster will contain the 10 Shooting Safety Rules and alert users to free training programs.

TAKE AIM AT SAFETY - LEARN AND PRACTICE 10 SHOOTING SAFETY RULES. AIRGUNS ARE REAL GUNS, NOT TOYS. ONLY USE AGE APPROPRIATE AIRGUNS. YOU OR OTHERS COULD BE SERIOUSLY INJURED OR KILLED IF THESE RULES ARE NOT FOLLOWED.

1. **ALWAYS KEEP THE MUZZLE POINTED IN SAFE DIRECTION.** There are several safe "carries" depending on the situation. NEVER ALLOW THE MUZZLE TO POINT IN THE DIRECTION OF A PERSON.

2. **TREAT EVERY GUN AS IF IT WERE LOADED.** You can never be positive that you were the last person to handle the gun. Never take anyone's word about whether or not a gun is loaded. Always check a gun to see if it is loaded when removed from storage or received from another person. Even if you have fired an airgun one or more times and no pellet or BB was expelled from the barrel, it does not mean that the magazine of gun is empty of ammunition. Any airgun can fail to feed for any number of reasons. Continue to treat the airgun as loaded and ready to fire. ALWAYS TREAT A GUN AS IF IT IS LOADED EVEN IF YOU KNOW IT ISN'T.

3. **ONLY LOAD OR COCK A GUN WHEN YOU ARE SHOOTING.** A loaded gun has no place in your home or other public place.

4. **CHECK YOUR TARGET AND BEYOND YOUR TARGET.** Be sure all persons are well clear of the target area before you shoot. Check behind and beyond your target to be certain you have a safe backstop and that no person or property could be endangered.

5. **ANYONE SHOOTING OR NEAR A SHOOTER SHOULD WEAR SHOOTING GLASSES.** Also, all other persons should remain behind the shooter.

6. **NEVER CLIMB OR JUMP WITH A GUN.** You can't control the direction of the muzzle if you stumble or fall. You should safely lay the gun down or hand it to a companion while you climb or jump over anything.

7. **AVOID RICOCHET.** Never shoot at a flat hard surface or at the surface of water. Ammunition can ricochet off of water just like a skipped rock.

8. **KEEP THE MUZZLE CLEAR.** Never let anything obstruct the muzzle of a gun. Don't allow the muzzle to come in contact with the ground.

9. **GUNS NOT IN USE SHOULD ALWAYS BE UNLOADED.** Keeping guns unloaded when not in use is critical to the safety of you and others. When you are finished shooting, put the trigger safety in the "on" position and unload the gun. Store guns so that they are inaccessible to untrained shooters and store ammunition separately from the gun.

10. **RESPECT OTHER PEOPLE'S PROPERTY.** Whether you're target shooting or hunting, if you're a guest on others' land, you should leave it exactly as you found it.

x) Free Training Respondent will provide an enclosure in the package and notation on the retail poster, sticker or counter card alerting users as to the availability of free training at their local Jaycee or shooting organization and a toll free 800 number for the dissemination of such information and will report progress to the Commission.

xi) BB Package. An insert or package label shall be added to all boxes of BBs alerting the consumers that (1) Always point the gun in a safe direction; (2) Always treat every gun as if it were loaded; (3) Any gun may fail to load, feed or fire a BB for a variety of reasons. Even if the gun fails to fire a BB one or more times, do not assume it is unloaded; (4) A BB can seriously injure or kill you or other humans if it is fired in an unsafe direction; (5) Shoot safely.

12. Upon final acceptance by the Commission of this Consent Agreement and Order, the Commission shall issue the attached Order incorporated herein by reference.

13. Agreements, understandings, representations or interpretations made outside this Consent Agreement and Order may not be used to vary or contradict its terms.

14. This Consent Agreement in no way constitutes an admission of liability of any kind and Respondent has disputed and continues to dispute the allegations made in the Complaint of the Consumer Product Safety Commission. Pursuant to Federal Rules of Evidence 403 and applicable case law, it is the parties' intent and they agree that the Consent Agreement and the action itself is not a finding of liability of any kind and not admissible as evidence for any purpose in any proceeding or in any action in state or federal courts.

15. The provisions of this Consent Agreement and Order shall apply to Respondent and Commission and each of their successors and assigns.

DATED: Nov. 14, 03, 2003

RESPONDENT DAISY MANUFACTURING COMPANY

By _____ (counsel)
400 West Stribling Drive
Rogers, AR 72756

DATED: 12/03/03, 2003

U.S. CONSUMER PRODUCT SAFETY COMMISSION

By: _____
4330 East West Highway
Bethesda, Maryland 20814

UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

In the matter of DAISY MANUFACTURING COMPANY, d/b/a as Daisy Outdoor Products 400 West Stribling Drive Rogers, Arkansas 72756 Respondent.	)))))))))	CPSC Docket No. 02-2

ORDER

Upon consideration of the Consent Agreement submitted by Respondent Daisy Manufacturing Company, Inc., (hereinafter "Respondent"), a corporation, and the Consumer Product Safety Commission ("Commission"), having jurisdiction over the subject matter and Respondent; and it appearing that the Consent Agreement and Order in the public interest;

IT IS ORDERED, that the Consent Agreement be and hereby is accepted by Order of the Commission.[1]

FOR THE COMMISSION:

Todd A. Stevenson
Secretary

Dated: January 30, 2004

[1]Chairman Stratton and Commissioner Gall voted to accept the proposed Offer of Settlement. Commissioner Moore voted to reject the proposed Offer of Settlement.

EXHIBIT A

DATES: Comments must be received on or before November 21, 2001.

ADDRESSES: Interested persons should submit their views and comments to Jean A. Webb, Secretary, Commodity Futures Trading Commission, Three Lafayette Centre, 1155 21st Street, NW., Washington, DC 20581. In addition, comments may be sent by facsimile transmission to facsimile number (202) 418–5521 or by electronic mail to *secretary@cftc.gov*. Reference should be made to the CSCE commercial markets index futures and option contracts.

FOR FURTHER INFORMATION CONTACT: Please contact Fred Linse of the Division of Economic Analysis, Commodity Futures Trading Commission, Three Lafayette Centre, 1155 21st Street NW., Washington, DC (202) 418–5273. Facsimile number (202) 418–5527. Electronic mail: *flinse@cftc.gov*.

SUPPLEMENTARY INFORMATION: Copies of the terms and conditions will be available for inspection at the Office of the Secretariat, Commodity Futures Trading Commission, Three Lafayette Centre, 1155 21st Street, NW., Washington, DC 20581. Copies of the terms and conditions can be obtained through the Office of the Secretariat by mail at the above address or by phone at (202) 418–5100.

Other materials submitted by the CSCE in support of the request for approval may be available upon request pursuant to the Freedom of Information Act (5 U.S.C. 552) and the Commission's regulations thereunder (17 CFR part 145 2000)), except to the extent they are entitled to confidential treatment as set forth in 17 CFR 145.5 and 145.9. Requests for copies of such materials should be made to the FOI, Privacy and Sunshine Act Compliance Staff of the Office of Secretariat at the Commission's headquarters in accordance with 17 CFR 145.7 and 145.8.

Any person interested in submitting written data, views, or arguments on the proposed terms and conditions, or with respect to other materials submitted by the CSCE should send such comments to Jean A. Webb, Secretary, Commodity Futures Trading Commission, Three Lafayette Centre, 115 21st Street, NW., Washington, DC 20581 by the specified date.

Issued in Washington, DC on October 29, 2001.

Richard A. Shilts,

Acting Director.

[FR Doc. 01–27773 Filed 11–5–01; 8:45 am]

BILLING CODE 6351–01–M

CONSUMER PRODUCT SAFETY COMMISSION

[CPSC Docket No. 02–2]

Daisy Manufacturing Co; Complaint

AGENCY: Consumer Product Safety Commission.

ACTION: Publication of a complaint under the Federal Hazardous Substances Act and the Consumer Product Safety Act.

SUMMARY: Under provisions of its Rules of Practice for Adjudicative Proceeding (16 CFR part 1025), the Consumer Product Safety Commission must publish in the **Federal Register** Complaints which it issues. Published below is a Complaint in the matter of Daisy Manufacturing Company.

SUPPLEMENTARY INFORMATION: The text of the Complaint appears below.

Dated: October 31, 2001

Todd A. Stevenson,

Acting Secretary.

In the matter of; Daisy Manufacturing Company, Inc., doing business as Daisy Outdoor Products CPSC Docket No.: 02–2; 400 West Stribling Drive, Rogers, Arkansas 72756, Respondent.

Complaint

Nature of Proceedings

1. This is an administrative proceeding pursuant to section 15 of the Federal Hazardous Substances Act ("FHSA"), 15 U.S.C. 1274, and section 15 of the Consumer Product Safety Act ("CPSA"); 15 U.S.C. 2064, for public notification and remedial action to protect the public from substantial risks of injury and substantial product hazards created by Respondent Daisy Manufacturing Company, Inc.'s Powerline Airguns.

2. This proceeding is governed by the Rules of Practice for Adjudicative Proceedings before the Consumer Product Safety Commission, 16 CFR part 1025.

Jurisdiction

3. This proceeding is instituted pursuant to the authority contained in sections 15(c), (d) and (f) of the CPSA, 15 U.S.C. 2064(c), (d) and (f), and sections 15(c)(1), (2) and (e) of the FHSA, 15 U.S.C. 1274(c)(1), (2) and (e).

Parties

4. Complaint Counsel is the staff of the Legal Division of the Office of Compliance (hereinafter referred to as "Complaint Counsel") of the United States Consumer Product Safety Commission (hereinafter referred to as "The Commission"), an independent regulatory commission established by section 4 of the CPSA. 15 U.S.C. 2053.

5. Respondent Daisy Manufacturing Company, Inc. (hereinafter referred to as "Daisy") is a Delaware Corporation, with its principal place of business located at 400 West Stribling Drive, Rogers, Arkansas.

6. Daisy "manufactures" Powerline Airguns and is, therefore, a "manufacturer" of consumer products as that term is defined in the CPSA, 15 U.S.C. 2052(a)(4).

The Consumer Product

7. The Daisy Powerline Airgun is a pneumatic powered or carbon dioxide ("CO_2") charged gun designed to shoot BBs or pellets at a rate over 350 feet per second (fps). From September, 1972 to January, 2001, Daisy manufactured approximately 4,925,353 model 880 Powerline Airguns including the following models and product numbers: 880, 881, 882, 1880, 1881, 9072, 9082, 9083, 9093, 9393, 9382, 3305, 3480, 3933, 1455, and 5150. Daisy continues to manufacture the model 880 Powerline Airgun.

8. From 1984 through January, 2001, Daisy manufactured approximately 2,353,798 model 856 Powerline Airguns including the following models and product numbers: 860, 856, 2856, 7856 and 990. Daisy continues to manufacture the model 856 Powerline Airgun. (All models recited in paragraphs 7 and 8 above are hereinafter referred to as "Daisy Powerline Airguns.")

9. The retail cost of the Daisy Powerline Airgun currently being sold varies from approximately $39.95 to $67.95.

10. Daisy has and continues to produce and distribute the Powerline Airguns in United States commerce for sale to a consumer for use in or around a permanent or temporary household or residence, in recreation or otherwise or for the personal use, consumption or enjoyment of a consumer in or around a permanent or temporary household or residence, in recreation or otherwise. These airguns are, therefore, "consumer products" that are "distributed in commerce." 15 U.S.C. 2052(a)(1) and (11).

Count 1

The Daisy Powerline Airguns Contain Defects Which Creates a Substantial Product Hazard Defect

11. Paragraphs 1 through 10 are hereby realleged, and incorporated by reference as though fully set forth herein.

12. A user can load 50 to 100 BBs through a loading door on the Daisy

Powerline Airguns, and into the magazine reservoir. The consumer may then pull a bolt handle toward the rear to cock the gun, and close a pump valve. When the muzzle is raised, at least 45° above the horizon, and the gun is not tilted towards either side, BBs move from the magazine, via gravity, onto a feed ramp, and to a loading port. This allows a magnetic bolt tip to pick up a BB from the feed ramp. The user can then close the bolt by pushing the handle forward, and chamber the BB into the rifle.

On the pneumatic versions of these airguns, the user provides power to the Daisy Powerline Airguns by pumping the forearm lever on the gun. This pumping process builds air pressure and determines the speed and power with which the projectile is ultimately expelled from the airgun. On the CO_2 cartridge versions of the gun, the consumer can insert a replaceable CO_2 cartridge which provides all the power needed to expel the projectile.

13. The Daisy Powerline Airguns have a rifle barrel, which is concentrically supported and surrounded by an outer barrel casing. These airguns have a "virtual magazine", whose borders consist of the receiver halves, a casing surrounding the cylindrical pump that holds the projectile propellant, the outer barrel casing, and the inner rifle barrel's forward support tab. The Daisy design permits BBs to move freely around the inside of the magazine area.

14. During normal use of the Daisy Powerline Airguns, BBs may become lodged within the "virtual magazine" of the gun. A consumer using the gun may fire the gun repeatedly or shake the gun and receive no visual or audible indication that the airgun is still loaded.

15. Although Daisy made some changes to the Powerline Airguns to try to lessen the likelihood that BBs will lodge in the gun, BBs can still lodge inside of them. The Daisy Powerline Airguns design, and manufacturing variances, prevent BBs from loading into the firing chamber and lead consumers to believe the airgun is empty, are, therefore, defective within the meaning of section 15 of the CPSA, 15 U.S.C. 2064, and section 15 of FHSA, 15 U.S.C. 1274.

16. Because these Daisy airguns can lodge BBs or fail to feed BBs into the firing chamber under normal conditions of use, consumers may be unaware when a BB loads unless they look into the loading port. Daisy made design decisions that impair the ability of the user to ascertain whether a BB is loaded. Daisy manufactures BBs that are silver in color. The Powerline Airgun's feed ramp is made of a zinc material. Due to the color similarity, a user operating the airgun rapidly may not be able to discern the presence of a BB even if he is looking directly into the loading port. Further, Daisy designed the airgun so a user can install an optional riflescope on top of the receiver halves and over the loading port. The placement of the riflescope can obscure the user's ability to see a BB in the loading port.

17. Daisy's design relies unduly on consumers to see a BB in the loading port and then interferes with that ability in reasonably foreseeable circumstances. This design constitutes a defect under section 15 of the CPSA, 15 U.S.C. 2064, and section 15 of the FHSA, 15 U.S.C. 1274.

18. Daisy's Powerline Airguns use a safety mechanism that does not automatically engage when the airgun is loaded and ready to fire. An automatic safety design would prevent against accidental discharge.

19. The failure to incorporate an automatic safety into the Daisy Powerline Airgun constitutes a design defect under section 15 of the CPSA, 15 U.S.C. 2064, and section 15 of the FHSA, 15 U.S.C. 1274.

Substantial Risk of Injury

20. All of the approximately 7,279,151 Daisy Powerline Airguns, and the Powerline Airguns currently being sold, contain the defects alleged in paragraphs 11 through 19 above.

21. Most of the consumers using these airguns will be children or young adults. It is likely that these consumers will operate the gun rapidly and not continue to check the loading port to determine whether any BBs are feeding into the chamber when they believe the airgun is no longer loaded. It is also reasonably foreseeable consumers, during use, will be less careful with a gun they believe is not loaded. A BB that had previously been lodged and misfed can then be loaded, and fired from the airgun. Under these circumstances, BBs are likely to be fired at and strike the consumer or another person in the vicinity.

22. It is likely consumers will carry and handle the Daisy Powerline Airguns when they are cocked and loaded. Since these airguns do not have an automatic safety, it is likely the gun will be discharged during handling in the direction of the user or anther person in the vicinity.

23. At close range, BBs fired from these airguns can penetrate tissue and bone, damaging internal organs, such as the brain, heart, liver, spleen, stomach, bowel and colon. The Commission has learned of at least 15 death and 171 serious injuries, including brain damage and permanent paralysis, caused by the defects in the Daisy Powerline Airguns. Most of these injuries were to children under the age of 18.

24. The defects in the Daisy Powerline Airgun create a substantial risk of injury, and the airguns create a substantial product hazard within the meaning of section 15(a)(2) of the CPSA, 15 U.S.C. 2064(a)(2).

Counts

The Daisy Powerline Airguns Create a Substantial Risk of Injury to Children

25. Paragraphs 1 through 24 are hereby realleged, and incorporated by reference as though fully set forth herein.

26. The Daisy Powerline Airguns were marketed for, and intended for the use of, children. Although Daisy marketed the airguns initially with no age recommendation, it later labeled them for users 14 and older and eventually 16 and older. A substantial number of the airguns are intended for use by children.

27. Given the pattern of the defects alleged above, the number of Powerline Airguns distributed in commerce, and the likelihood of further serious injury and death, especially to children, these airguns present a substantial risk of injury to children. Sections 15(c)(1) and (c)(2) of the FHSA, 15 U.S.C. 1274(c)(1) and (c)(2).

Relief Sought

Wherefore, in the public interest, Complaint counsel requests that the Commission:

A. Determine that Respondent Daisy's Powerline Airgun presents a "substantial product hazard" within the meaning of section 15(a)(2) of the CPSA, 15 U.S.C. § 2064(a)(2).

B. Determine that Respondent Daisy's Powerline Airgun presents a "substantial risk of injury to children" within the meaning of sections 15(c)(1) and (c)((2) of the FHSA, 15 U.S.C. 1274(c)(1) and (c)(2).

C. Determine that public notification under section 15(c) of the CPSA, 15 U.S.C. 2064(c), and section 15(c)(1) is required to protect the public adequately from the substantial product hazard and substantial risk of injury to children presented by the Powerline Airgun. We also want to prevent future distribution and order that the Respondents:

(1) Give prompt public notice that the Daisy Powerline Airgun presents a serious injury and death hazard to consumers and of the remedies available to remove the risk of injury and death;

(2) Mail such notice to each person who is or has been a distributor or retailer of the Daisy Powerline Airgun;

(3) Mail such notice to every person to whom Respondents know the Daisy Powerline Airgun were delivered or sold; and

(4) Include in the notice required by (1), (2) and (3) above a complete description of the hazard presented, a warning to stop using the Daisy Powerline Airgun immediately; and clear instructions to inform consumers how to avail themselves of any remedy ordered by the Commission.

D. Determine that action under section 15(d) of the CPSA, 15 U.S.C. 2064(d), and section 15(c)(2) of the FHSA, 15 U.S.C. 1274(c)(2) is in the public interest and order Respondents:

(1) To cease distribution of all Daisy Powerline Airguns until such time as all defects in the airguns are eliminated and the risk of injury reduced in a manner satisfactory to the Commission.

(2) With respect to Daisy Powerline Airguns already manufactured and distributed in commerce, Daisy must

(a) Elect to repair all the Powerline Airguns so they will not create a serious injury and death hazard; replace all the Powerline Airguns with a like or equivalent product which will not create a serious injury or death hazard; or refund to consumers the purchase price of the Powerline Airgun;

(3) Make no charge to consumers and reimburse them for any foreseeable expenses incurred in availing themselves of any remedy provided under any order issued in this matter;

(4) Reimburse distributors and dealers for expenses in connection with carrying out any Commission Order issued in this matter;

(5) Submit a plan satisfactory to the Commission, within ten calendar (10) days of service of the final Order, directing that actions specified in paragraphs D(2) through D(4) above be taken in a timely manner;

(6) Submit monthly reports documenting progress of the corrective action program;

(7) For a period of five (5) years after entry of a Final Order in this matter, keep records of its actions taken to comply with paragraphs D(2) through D(4) above, and supply these records upon request to the Commission for the purpose of monitoring compliance with the Final Order.

e. Daisy shall notify the Commission at least 60 days prior to any change in their business (such as incorporation, dissolution, assignment, sale or petition for bankruptcy) that results in, or is intended to result in, the emergence of successor ownership, the creation or dissolution of subsidiaries, going out of business, or any other change that might affect compliance obligations under a Final Order issued by the Commission.

F. Daisy shall take such other and further actions as the Commission deems necessary to protect the public health and safety and to comply with the CPSA and FHSA.

Issued by order of the Commission.

Dated this 30th day of October 2001.

Alan H. Schoem,

Assistant Executive Director, Office of Compliance, U.S. Consumer Product Safety Commission (301) 504–0621.

Eric L. Stone,

Director, Legal Division, Office of Compliance.

Jimmie L. Williams, Jr.,

Complaint Counsel, Office of Compliance, 4330 East West Highway, Bethesda, Maryland 20814–4408, (301) 504–0626, ext. 1376.

[FR Doc. 01–27872 Filed 11–05–01; 8:45 am]

BILLING CODE 6350–01–M

DEPARTMENT OF DEFENSE

Department of the Army

MTMC Pam 55–4 "How to do Business in the DOD Personal Property Program"; Defense Transportation Regulation Part IV, DOD Personal Property Program; Tender of Service

AGENCY: Military Traffic Management Command (MTMC), DoD.

ACTION: Notice; Moratorium.

SUMMARY: Moratorium on accepting application in the DOD Personal Property Program. MTMC, as Program Manager of the Department of Defense (DOD) Personal Property Shipment and Storage Program (the Program), proposes to streamline and strengthen the carrier qualification process. Due to the administrative workload to requalify current DOD participants we must impose a moratorium. See item in this Federal Register from MTMC, notice on new procedures, MTMC Pam 55–4 "How to do Business in the DOD Personal Property Program"; Defense Transportation Regulation Part IV; Tender of Service (request for comments), which addresses the streamlining and strengthening of carrier qualification procedures. A moratorium has been established on accepting new applications in the Department of Defense (DOD) Personal Property Program for a period of time to allow smooth transition to the new electronic carrier qualification process. This period of time will not exceed one year and will end when all participants are re-qualified.

DATES: The moratorium will be effective November 16, 2001.

FOR FURTHER INFORMATION CONTACT: Ms. Sylvia Walker, Headquarters, Military Traffic Management Command, Attn: MTPP–HQ, Room 10N67–51, Hoffman Building II, 200 Stovall Street, Alexandria, VA 22332–5000; Telephone (703) 428–2982; Telfax (703) 428–3388/3389.

SUPPLEMENTARY INFORMATION:

I. Moratorium

Current: MTMC has no moratorium.

Proposed: MTMC will impose a temporary moratorium on accepting new applications for qualification beginning 10 days from the date of publication of this notice in the Federal Register. MTMC may reduce the moratorium to a lesser period based on the time it takes to complete transition from the manual to the electronic applicaiton process. Once the moratorium is lifted future applicants must qualify under the new qualification procedures.

II. Paperwork Reduction Act

The Paperwork Reduction Act, 44 U.S.C. 3501 *et seq.*, does not apply because no information requirements or records keeping responsibilities are imposed on officers, contractors, or members of the public.

III. Regulatory Flexibility Act

This change is related to public contracts and is designed to streamline and strengthen the DOD personal property carrier qualification program. This change is not considered rule making within the meaning of the Regulatory Flexibility Act, 5, U.S.C. 601–612.

Luz D. Ortiz,

Army Federal Register Liaison Officer.

[FR Doc. 01–27862 Filed 11–5–01; 8:45 am]

BILLING CODE 3710–08–M

DEPARTMENT OF DEFENSE

Department of the Army

MTMC Pam 55–4 "How to do Business in the DOD Personal Property Program"; Defense Transportation Regulation Part IV; Tender of Service

AGENCY: Military Traffic Management Command (MTMC), DoD.

ACTION: Notice; Request for comments

SUMMARY: New Procedures to participate in the Department of Defense Personal Property Program. MTMC, as Program Manager of the Department of Defense (DOD) Personal Property Shipment and Storage Program (the Program), proposes to streamline and strengthen the carrier

EXHIBIT B

UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of Daisy Manufacturing Company, Inc. doing business as Daisy Outdoor Products 400 West Stribling Drive Rogers, Arkansas 72756, Respondent	CPSC Docket No. 02-2

ANSWER

Respondent Daisy Manufacturing Company ("Daisy"), by its attorneys Locker, Greenberg & Brainin. P C and Friday Eldredge & Clark, as and for their Answer to the Complaint hereinbefore served herein, respectfully set forth, represent and allege as follows

1 Admits the allegations set forth in paragraph "1" of the Company except denies that "substantial risks of injury and substantial hazard" are "created by Respondent Daisy's Powerline Airguns"

2. Admits the allegations contained in paragraph "2" of the Complaint.

3. Admits allegations contained in paragraph "3" of the Complaint

4. Admits allegations contained in paragraph "4" of the Complaint.

5 Denies each and every allegation set forth in paragraph "5" of the Complaint

6. Admits the allegations contained in paragraph "6" of the Complaint.

7 Denies each and every allegation set forth in paragraph "7" of the Complaint.

8 Denies each and every allegation contained in paragraph "8" of the Complaint and avers that the Commission definition of the models specified in paragraphs "7" and "8" of the

Complaint as "Daisy Powerline Airguns" is vague, misleading, conclusory and incapable of adequate response.

9. Denies each and every allegation set forth in paragraph "9" of the Complaint and avers that the Commission's definition of "Powerline Airguns" is vague, misleading, conclusory and incapable of adequate response.

10. Denies each and every allegation contained in paragraph "10" of the Complaint and avers that the Commission's definition of "Powerline Airguns" is vague, misleading, conclusory and incapable of adequate response.

11. Pleads to each and every allegation set forth in paragraph "11" of the Complaint by repeating and re-alleging each and every prior allegation hereof as set forth at length herein.

12. Denies each and every allegation set forth in paragraph "12" of the Complaint and avers that the Commission's characterization of the function of the Powerline airguns is vague, misleading, conclusory and incapable of adequate response.

13. Denies each and every allegation set forth in paragraph "13" of the Complaint and avers that the Commission's description of the "virtual magazine" is vague, misleading, conclusory and incapable of adequate response.

14. Denies each and every allegation set forth in paragraph "14" of the Complaint and avers that the Commission's description of the "virtual magazine" is vague, misleading, conclusory and incapable of adequate response.

15. Denies each and every allegation set forth in paragraph "15" of the Complaint.

16. Denies each and every allegation set forth in paragraph "16" of the Complaint, except admits that Daisy's BBs are silver in color and the feed ramp is made of a zinc material.

17. Denies each and every allegation set forth in paragraph "17" of the Complaint.

18. Denies each and every allegation set forth in paragraph "18" of the Complaint.

19. Denies each and every allegation contained in paragraph "19" of the Complaint.

20. Denies each and every allegation contained in paragraph "20" of the Complaint.

21. Denies each and every allegation contained in paragraph "21" of the Complaint.

22. Denies each and every allegation contained in paragraph "22" of the Complaint.

23. Denies each and every allegation set forth in paragraph "23" of the Complaint and avers that the Commission's characterization of children under the age of "18" is vague, misleading, conclusory and incapable of adequate response.

24. Denies each and every allegation set forth in paragraph "24" of the Complaint.

25. Pleads to each and every allegation set forth in paragraph "25" of the Complaint by repeating and re-alleging each and every prior allegation hereof as set forth at length herein.

26. Denies each and every allegation set forth in paragraph "26" of the Complaint and avers the allegation set forth in the second sentence of paragraph "26" of the Complaint is vague, misleading, conclusory and incapable of adequate response. Respondent has always labeled the 856 and 880 Airguns as intended for use by persons of a suitable age as provided for in the Industry Voluntary Standard ASTM F589 and 590.

27. Denies each and every allegation set forth in paragraph "27" of the Complaint.

The Factual and Legal Defenses to the allegations in the Complaint are as follows:

LAW

28. The Commission's Complaint is vague, misleading and conclusory and has failed to adequately plead a cause of action that the airguns are defective and create a substantial

product hazard within the meaning of Section 15 (a)(2) of the Consumer Product Safety Act; 15 U.S.C.§2064 (a)(2)

29. The allegations raised in Count II of the Complaint were never set forth in the staff's preliminary determination letter of June 15, 2001. As a matter of administrative law, they cannot now be asserted in the Complaint. The policy of the Commission is to regulate as children's products those which are intended for children under the age of 15 years. Daisy's 880 and 856 airguns are not children's products. They are intended for and marketed to persons age 16 and over and bar coded for sale to persons age 18 and over. This Count contravenes the Commission's own stated policy. The Commission's pleadings in Count II are vague, misleading and conclusory and they have failed to adequately plead a cause of action that the airguns are defective and present a "substantial risk of injury to children" within the meaning of Sections 15 (c)(1) and (c)(2) of the Federal Hazardous Substances Act, 15 U.S.C.§1274 (c)(1) and (c)(2).

VOLUNTARY STANDARDS

30. The Commission has held on multiple occasions over the past 20 years that the Daisy 880 and 856 Powerline Airguns are not defective. During such period, the Commission held that any regulation of airguns should defer to the two existing voluntary standards ANSI/ASTM F589 and ASTM F590, in which the Commission was actively involved, and recognized that the product was not a toy and that there was an inherent risk in using the product accepted by an adult who gives permission for the product's use.

31. In four voluntary standards deliberations, ASTM F589-78, F589-85, F589-92 and F589-00, the Subcommittee, which included Commission personnel, specifically rejected the

elimination of gravity feed airgun systems and the requirement of an automatic safety. The Commission breaks with past practice in issuing this Complaint. These issues are generic to airguns and should be advanced through working standards, or regulation, not compliance action directed at Respondent.

GRAVITY FEED

32. The lodging of a BB in the magazine is not a defect. While a gravity feed as well as a controlled feed system may, on occasion, fail to load a BB up to the visible loading port, the lodging of a BB will not give a user a false sense of security and allow a BB to unintentionally fall into the loading area and be shot from the gun. In order to shoot, seven specific and deliberate steps must be taken by the user. These are:

1. Tipping the barrel up
2. Putting the safety "ON"
3. Pumping the rifle
4. Pulling the bolt back to visibly load the BB into the open portal (at which time the BB is always visible and the gun will not fire);
5. Closing the bolt to put the visible BB into the firing chamber.
6. Taking the safety "OFF."
7. Deliberately aiming and firing the gun

As the Commission is aware, the instructions that come with each Model 880 and 856 gravity feed Powerline airgun clearly state the following:

⚠ **CAUTION:** Always view the BB or pellet when closing the bolt and loading port.

⚠ **WARNING:** BBs feed from the magazine by gravity which requires that the muzzle be raised. NEVER ASSUME THE MAGAZINE OR CHAMBER IS EMPTY even if the gun does not fire a projectile.

33. The Commission, in its prior investigations of Daisy BB guns between 1981 and 1999 conducted engineering, human factors and metallurgical analysis on the Daisy 880 and 856 airguns and concluded that the guns are not defective. A BB that does not load presents no danger, constitutes no defect, nor does it present an unreasonable risk, let alone substantial risk of injury.

CPSC STAFF EVALUATION

34. The Commission's determination of defect in the Complaint is vague, misleading and conclusory and is not supported by any new facts or engineering, human factors and metallurgical data other than outside oral statements based upon testing in which out of spec BBs were used and the guns were deliberately altered to simulate lodging. It is extraordinary that the Commission would not defer to 20 years of internal staff analysis of the products which are the subject of the Complaint and instead rely on oral opinions of outside experts selected by plaintiffs' counsel in a personal injury action. The Daisy model 880 and 856 airguns were the subject of an intense two-year technical review ending in November 1995, where the Commission concluded, following technical staff studies in mechanical engineering, metallurgy and human factors, that the Daisy 880 and 856 airguns were not defective, met all applicable voluntary safety standards, were not toys and should be used only with adult supervision.

BB CONTRAST

35. In its Complaint, the Commission alleges that the guns in question are defective because a lack of contrast between the zinc loading port and the steel BB lessens the likelihood that the BB would be noticed and that a consumer might install a scope on the airgun, which

could further obscure visibility to view the loading port and see a BB. This allegation is false and misleading. The steel BBs sold by Daisy are glossy, with a high reflective surface, and are more visible when in the loading port than BBs which are a dull bronze, blue or leaden in color. Moreover, even with the scope mounted directly above the loading port, there is approximately 15/16ths of an inch clearance from the bottom of the scope to the loading port opening of the receiver. Clearance of approximately 1 inch does not obstruct the ability to view the BB in the magazine tip by any prudent person checking for its presence in the port.

AUTOMATIC SAFETIES

36. In its Complaint, the Commission alleges that the airguns in question are defective because they have manual safeties which are dependent on consumers engaging them and do not have an automatic safety.

37. The 856 and 880 Models are intended for marksmanship training, as well as recreational shooting, by persons 16 years of age and older. The user is warned that they are not toys and that adult supervision is required. It is well known that many persons 16 years and older are already hunting and using firearms in many parts of the country. The bolt action of the Model 856 and 880 is similar to the bolt action in a firearm. In a bolt-action firearm, the top cartridge in a magazine would be seen when the bolt is retracted. In the Model 856 and Model 880, the BB is visible when it is picked up by the bolt, placed on the magnetic tip, and removed from the BB reservoir. This design feature is of great value, because it closely duplicates the general handling and cartridge loading characteristics of a cartridge bolt-action firearm.

38. When the safety is disengaged, a red band is clearly visible around the safety button as an alert to the user regarding the rifle's condition of readiness. It is also possible to

easily ascertain that the safety is not engaged by the tactile feel of the safety button protruding from the left side of the trigger guard. In addition, the legends PUSH FIRE and PUSH SAFE can be seen in relief on the right and left sides of the trigger guard, respectively, to help the shooter ascertain the position of the trigger safety. The cross bolt manual trigger safety of these airguns prevents an unwanted discharge when engaged. Because these gun models are designed to be used as training models for later firearm use, it is important that they have safeties that function similarly. Automatic safeties are rarely used in firearms.

39. The utility of these airguns as training models for firearms will be defeated by the addition of an automatic safety, because it is important that they function in a similar manner to firearms. American firearms generally do not have automatic safeties. Automatic safeties create frustration in making follow-up shots for the user and can result in accidents by the user when they check for the non-firing of the gun due to the automatic safety. A manual safety is something that allows the user always to be in control of the position of the safety on the firearm. An automatic safety on this type of air rifle would necessarily create a situation where the novice shooter would learn to rely on a device which he would be unlikely to ever encounter with firearms. The issue of an automatic safety is generic to all airguns and should be advanced through working standards or regulation, not compliance action directed at Respondent.

PROCEDURAL IRREGULARITIES

40. It is clear that the Complaint issued by the Commission was driven by pre-judgment of the issues of law and fact Chairman of the CPSC, thereby reversing decisions on issues previously addressed by the Commission. The timing of the filing of the Complaint is highly politicized and rife with procedural irregularities. In the Chairman's August 8, 2001

statement announcing her departure, she announced a recall "lawsuit regarding a very dangerous product [which everyone at the Commission knew to be Daisy BB guns] that kills and maims children" and its timetable "before I leave". The August 8, 2001 announcement was made despite the fact that the Commission did not receive its briefing package in the Daisy matter until October 4, 2001. Letters from Respondent's counsel were sent to the Chairman with copies to the other commissioners demanding recusal of the Chairman from the vote on issuance of a complaint due to her unalterably closed mind and pre-judgment of the issues of law and fact in this matter. The Chairman failed to respond and recuse herself, thereby denying Respondent due process of law.

41 Other irregularities have characterized the handling of this case. Prior to voting on the issuance of a complaint, the Commission staff violated the confidentiality provisions of Section 6(b) of the Consumer Product Safety Act and released confidential information and a draft complaint to various media organizations who were also told prior to the vote that the Commission would be holding a press conference on this matter at 2:00 P.M. on the day of the vote and the Complaint was rushed accordingly.

42. Although the Commission staff retained both a gunsmith expert and a materials science expert to examine Daisy BB guns alleged to lodge BBs in the magazine or elsewhere, the Commission has no written report from either of these experts. Nor was the work of these experts reviewed by the Commission's own laboratory and technical staff who had found otherwise for twenty years. Inquiry into the reason no written report was prepared reveals that a decision was made to litigate prior to a vote by the Commission and the case was prepared with that objective in mind, rather than in the ordinary course of thoroughly briefing the Commission prior to a vote

43. The result of the actions of the Chairman and the Commission has been to deny Respondent due process of law in this matter in violation of the Fifth Amendment of the Constitution and a fair trial under the provisions of the Administrative Procedure Act (5 U.S.C. § 551 et seq. To quote the record, "Sentence first, Verdict afterward."

WHEREFORE, Respondent Daisy Manufacturing Company respectfully requests judgment dismissing the Complaint in this matter, and for such other, further and different relief as the Commission may deem just and proper.

Dated: November 16, 2001

Respectfully submitted,

LOCKER GREENBERG & BRAININ, P.C.
420 Fifth Avenue, 26th Floor
New York, NY 10018
Tel.: (212) 391-5200

By: _____
Jeffrey M. Locker

FRIDAY ELDREDGE & CLARK
2000 Regions Center
400 West Capitol
Little Rock, ARK 72201-3493
Tel.: (501) 376-2011

TO: Office of the Secretary
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, Maryland 20814

Daisy's Answer 11 12.01.wpd

EXHIBIT C

Daisy Outdoor Products

2002 Media Plan

Media Advertising devoted to Take Aim at Safety Campaign

TELEVISION
Buckmasters
Includes :30 commercials, product exposure,
commercials in videos, expo sponsorship opportunities
weblink, database access and print ads as detailed below.

TRADE PUBLICATIONS
SHOT Show directory (listings, logos and ad)
Shooting Sports Retailer

CONSUMER PUBLICATIONS
Hunting the Country (Vulcan)
Insights (NRA Youth)
Includes monthly ad featuring one Safety Rule
Shooting Sports USA
Airgun Illustrated (new publication)
Hunter's Handbook
(instructional 2-p. spread distributed nationally to
every person who takes a Hunter Ed course)
Hunter's Journal
(pull-out poster on Shooting Safety Rules distributed
nationally to all Hunter Education Instructors for posting on classroom wall)

UNALLOCATED
Reserve for development of partnerships to promote
safety campaign message in conservation organizations'
print publications

BONUS PUBLICATIONS (part of Buckmaster's package)
Buckmasters Whitetail (full page, six issues)
Rack (full page, six issues)
Young Bucks Outdoors (full page, four issues)
New Member Guide (full page, annual)
Expo program (full page, annual)

OTHER
Museum Advertising/local markets

EXHIBIT D

CERTIFICATE

TAKE AIM AT SAFETY

CONGRATULATIONS TO

_____

This document certifies the shooting enthusiast named above has successfully completed Daisy's Take Aim at Safety quiz, thus demonstrating knowledge of the Ten Shooting Safety Rules. By signing this certificate, the recipient acknowledges and accepts his/her responsibility to practice these ten rules whenever handling a gun of any type throughout his/her lifetime.

of

_____

Daisy Outdoor Products

TAKE AIM AT SAFETY

DISCIPLINE · PATIENCE · SELF-CONTROL · RESPONSIBILITY

Daisy Outdoor Products

EXHIBIT E

LEARN AND PRACTICE THESE 10 SHOOTING SAFETY RULES

Daisy Outdoor Products urges you to shoot with supervision and always follow these safety rules.

1 ALWAYS KEEP THE MUZZLE POINTED IN A SAFE DIRECTION.

There are several safe "carries" depending on the situation. NEVER ALLOW THE MUZZLE TO POINT IN THE DIRECTION OF A PERSON.

2 TREAT EVERY GUN AS IF IT WERE LOADED.

You can never be positive that you were the last person to handle the gun. Never take anyone's word about whether or not a gun is loaded. Always check a gun to see if it is loaded when removed from storage or received from another person.* ALWAYS TREAT A GUN AS IF IT IS LOADED EVEN IF YOU KNOW IT ISN'T.

3 ONLY LOAD OR COCK A GUN WHEN YOU ARE SHOOTING.

A loaded gun has no place in your home or other public place.

4 CHECK YOUR TARGET AND BEYOND YOUR TARGET.

Be sure all persons are well clear of the target area before you shoot. Check behind and beyond your target to be certain you have a safe backstop and that no person or property could be endangered.

5 ANYONE SHOOTING OR NEAR A SHOOTER SHOULD WEAR SHOOTING GLASSES.

Also, all other persons should remain behind the shooter.

TAKE AIM AT SAFETY

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6 NEVER CLIMB OR JUMP WITH A GUN.

You can't control the direction of the muzzle if you stumble or fall. You should safely lay the gun down or hand it to a companion while you climb or jump over anything.

7 AVOID RICOCHET.

Never shoot at a flat hard surface or at the surface of water. Ammunition can ricochet off of water just like a skipped rock.

8 KEEP THE MUZZLE CLEAR.

Never let anything obstruct the muzzle of a gun. Don't allow the muzzle to come in contact with the ground.

9 GUNS NOT IN USE SHOULD ALWAYS BE UNLOADED.

Keeping guns unloaded when not in use is critical to the safety of you and others. When you are finished shooting, put the trigger safety in the "on" position and unload the gun. Store guns so that they are inaccessible to untrained shooters and store ammunition separately from the gun.

10 RESPECT OTHER PEOPLE'S PROPERTY.

Whether you're target shooting or hunting, if you're a guest on others' land, you should leave it exactly as you found it.

* See additional language to be added to Rule # 2 - next page

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* **ADDITIONAL LANGUAGE TO BE ADDED TO #2:**

Even if you have fired an airgun one or more times and no pellet or BB was expelled from the barrel, it does not mean that the magazine of gun is empty of ammunition. Any airgun can fail to feed for any number of reasons. Continue to treat the airgun as loaded and ready to fire.

EXHIBIT F

Exhibit F

Objectives

- Affirm Daisy as a responsible corporate citizen, committed to making safe products and to the safe use of its products
- Educate consumers regarding shooting safety rules
- Promote safe use of Daisy products

Audiences

- Consumers – both existing and potential Daisy-product owners
- Media – both industry trade and consumer

Strategies

- Establish and fund comprehensive educational campaign entitled "Take Aim at Safety"
- Dedicate creative messages and media expenditure to promoting Ten Shooting Safety Rules under the umbrella of "Take Aim at Safety" campaign.
- Offer free copy of Ten Shooting Safety Rules via mail
- Focus Daisy's website on prominently displaying/promoting Ten Shooting Safety Rules
- Invite website visitors to read Ten Shooting Safety Rules and take a quiz
- Reward those who score 100% on the website quiz with a personalized certificate
- Provide additional incentive to read Ten Shooting Safety Rules and successfully complete quiz by offering daily prize drawings for Take Aim at Safety pins and a grand prize of a trip to include a V.I.P. tour of the USA Shooting training facility on the grounds of the Olympic Training Center in Colorado Springs, Colorado.
- Promote existing Shooting Safety Education programs with U.S. Jaycees, 4-H, National Guard etc.
- Seek additional promotional partnership opportunities - in cooperation with conservation groups

Media

The highlight of the media plan is a multi-media relationship with Jackie Bushman's Buckmasters organization that includes showcasing each of the ten safety rules within their television program. Daisy's television commercials that air within the program will emphasize the importance of reading, knowing and following the Ten Shooting Safety Rules. Eighteen Buckmasters' magazine ads will be dedicated to promoting the Ten

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Shooting Safety Rules as well as the opportunity to win valuable prizes as an incentive to read, know and follow the Ten Shooting Safety Rules.

Packaging
We will apply a Take Aim at Safety label to the face of all Daisy brand and PowerLine brand long guns.

Additional Optional Plans/Materials

Sponsorship of USA Shooting Team
Daisy would explore a sponsorship opportunity with USA Shooting Team, utilizing athletes to further promote our Take Aim at Safety campaign message.

Safety CD
Daisy is exploring an opportunity to offer a free CD ROM which would promote the Ten Shooting Safety Rules, quiz users on their knowledge and reward them by "unlocking" valuable outdoor theme game software.

Events and Expos
Daisy is exploring an opportunity to create a custom mobile airgun shooting range which would enable the company to teach shooting safety at even more locations, events and expositions.