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U.S. CONSUMER PRODUCT SAFETY COMMISSION

WASHINGTON, D.C. 20207

JAN 8 1975

Mr. Bill Yurkofsky
Bill's Derailleur Bicycle Specialists
3211 Greenmead Road
Baltimore, Maryland 21207

Dear Mr. Yurkofsky:

This is in response to your letter dated September 28, 1974, requesting an advisory opinion about the requirements of the Commission's bicycle safety regulations for toe clearance (16 CFR 1512.17(d)), derailleur guards (16 CFR 1512.7(b)), protrusions (16 CFR 1512.4(e)), and projections (16 CFR 1512.4(g)).

In your letter you requested clarification of the term "center of the pedal" as it is used in paragraph 1512.17(d). That paragraph requires that bicycles which are not equipped with toe clips must have a clearance of at least 3.5 inches between the pedal and the front tire or fender when turned to any position. That paragraph provides that the measurement shall be made "from the center of the entire pedal's rotational axis..." "The pedal must be horizontal and in its most forward position."

You also asked if a device commonly called a "disc spoke protector" would satisfy the requirements of paragraph 1512.9(b), which provides that derailleurs shall be guarded to prevent an improperly adjusted or damaged drive chain from interfering with or stopping the rotation of the wheel. Incorporation of a disc spoke protector on a bicycle equipped with a derailleur would be one means to satisfy the requirement of paragraph 1512.9(b).

You also asked if the peg devices which are sometimes used to hold a tire pump to the frame of a bicycle would be considered to be "protrusions" as that term is used in paragraph 1512.4(e) or "projections" as that term is used in paragraph 1512.4(g). "Such devices would be exposed protrusions within the meaning of section 1512.4(e) if they are not covered by a protective cap or do not meet the requirements of sections 1512.4(e) and 1512.18(b). Protective caps must also be of such design and size so that they are not protrusions." If a tire pump

ADVISORY OPINION

is installed on a bicycle, it would be considered to be a protective cap and be subject to sections 1512.4(f) and 1512.18(c).

If the peg devices were located within the area described in paragraph 1512.4(g), they would be "projections," and if the tire pump were installed within that area, it would also be considered a "projection."

Sincerely,

Michael A. Brown,
General Counsel

BILL'S, INC. DERAILLEUR BICYCLE SPECIALISTS

3211 GREENMEAD RD
BALTIMORE, MARYLAND 21207
(301) 922-3672

September 28, 1974

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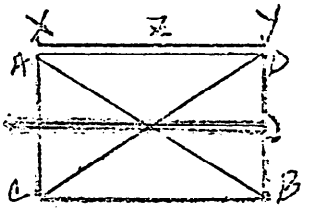
TECHNICAL ANALYSIS DIVISION

Sadye Dunn
Office of the Secretary
Consumer Product Safety Commission
1750 "K" Street N. W.
Washington, D. C. 20207

Madame Secretary,

Please provide an advisory opinion for the following specific questions with the least possible delay.

I. 1512.17 (d) Toe Clearance




What is the "Center of either pedal"?

Q. Is the intersection of lines AB & CD considered to be the center for this measurement, or is point Z on line XY the center, or is the center some other point?

II. 1512.9 Derailleur Guard

Is this the Disc device commonly referred to as a "Spoke Protector"? The purpose being to protect spokes from contact with a damaged or improperly adjusted derailleur.

III. Are peg devices used to hold a frame mounted tire pump considered to be projections or protrusions?

If the tire pump were installed, would the pump be considered to be a protective cap?

Prompt specific answers to these questions are required in order that manufacturers may begin the building of bicycle frames capable of meeting all safety regulations by the effective date.

Sincerely yours,

Bill Yurofsky