ADVISORY OPINION #177

6(b) CLEARED:

No Mfrs Identified
✓ Exceptions General
Mfrs Notified
Comments Processed

JAN 24 1975

Mr. H. Bukofzer
Executive Vice President Administration
Wilcox International Corporation
104-01 Foster Avenue
Brooklyn, New York 11236

Dear Mr. Bukofzer:

This is in response to your letter of July 23, 1974, requesting a definition of "tread surfaces" of the Commission's bicycle safety regulation for toe clips (16 CFR 1512.7(b)). A tread surface is "a surface over which a shoe sole moves or treads." It is anticipated that a Pedal Slip Test, Section 1512.18(i), will be proposed in the near future. The proposed rule further defines the tread surface and comments on the proposal will be invited.

Sincerely,

/S/

Michael A. Brown
General Counsel

WMenza:dmg:1/24/75

cc:
Chairman Simpson
Commissioner Pittle
Commissioner Newman
Commissioner Franklin
Commissioner Kushner
Executive Director
✓ Secretary
Director, BCM
Director, OSCA
Director, BES
Director, OFC

Hand T/9 RWS Pg PS

# WILCOX INTERNATIONAL CORPORATION

*Importers for:*

UNION CYCLE CO., LTD
ROYCE-UNION IMPORTS, LTD.
GOTHAM PRODUCTS CORP.
TIMES SQUARE STORES CORPORATION
THE SEEDMAN COMPANY, INC.

*Distribution of Imported Wares throughout the United States*

511-6

104-01 FOSTER AVENUE, BROOKLYN, N.Y. 11236
(212) 272-9600
CABLE ADDRESS JAMESEED

IN REPLY REFER TO:

July 23, 1974

Mr. Sadye E. Dunn
Secretary - Consumer Product Safety Commission
5401 Westbard Avenue
Bethesda, Maryland

Dear Sir:

We have reference to the Consumer Product Safety Commission's Safety Standards for Bicycles published in the Federal Register on July 16, 1974, Volume 39, No. 137, Part II.

We would like to specifically refer to Page 26107, Paragraph 1512.7, Subparagraph B - Toe Clips - "Pedals designed for optional use of toe clips shall have tread surfaces".

Would you be good enough to give us an explanation for your definition of "tread surfaces".

Your clarification would be very much appreciated.

Cordially yours,

WILCOX INTERNATIONAL CORPORATION

H. Bukofzer
Executive Vice President
Administration

HB:db

RECEIVED
OFFICE OF SECRETARY
JUL 25 4 44 PM '74
CONSUMER PRODUCT
SAFETY COMMISSION