#197

U.S. CONSUMER PRODUCT SAFETY COMMISSION

WASHINGTON, D.C. 20207

MFR/P... ... no objections

___ No ...

___ Comm... ...ached

___ Excisions/Revisions

___ Firm has not requested further notice

lah 8/17/84

22 APR 1975

RECEIVED OFFICE OF ... APR 22 ... '75 CONSUMER PRODUCT SAFETY COMMISSION

Mr. Lewis W. Siegel
Legal Department
C. Itoh & Co. (America) Inc.
270 Park Avenue
New York, N.Y. 10017

Dear Mr. Siegel:

This is in reply to your letter of April 3, 1975, requesting an advisory opinion is to whether the Bridgestone Kabuki "Picnica Wagon" is subject to Bicycle Regulations issued by the Consumer Product Safety Commission.

The regulation published in the Federal Register of July 16, 1974, (39 F.R. 26105) defines a bicycle as a two wheeled vehicle having a rear drive wheel that is solely human-powered (sec. 1512.2(a)). Since the "Picnica Wagon" is three-wheeled vehicle the regulations would not be applicable to the vehicle.

The "Picnica Wagon" is not subject to any existing standards issued by the Commission, however, proposed regulations applicable to tricycles may cover the vehicle.

Sincerely,

Michael A. Brown
General Counsel

TELEPHONE
(212) 953-5200

C. ITOH & CO. (AMERICA) INC.
270 PARK AVENUE
NEW YORK, N. Y. 10017

CABLE ADDRESS
ITOHAME, NEWYORK
TWX 212-867-7936
W. U. 1-2297
RCA 232837
ITT 420 225
W. U. 1-620335

RECEIVED
OFFICE OF SECRETARY
APR 8 9 08 AM '75
CONSUMER PRODUCT
SAFETY COMMISSION

April 3, 1975

Office of the Secretary
Consumer Product Safety Commission
1750 K Street N. W.
Washington, D. C. 20006

Dear Sir:

Is it possible to obtain an advisory opinion from the Commission as to whether the Bridgestone Kabuki "Picnica Wagon" (please see enclosed) is subject or will be subject to the CPSC bicycle standards or any other standards?

Thank you for your time and attention. I look forward to your response.

Sincerely yours,

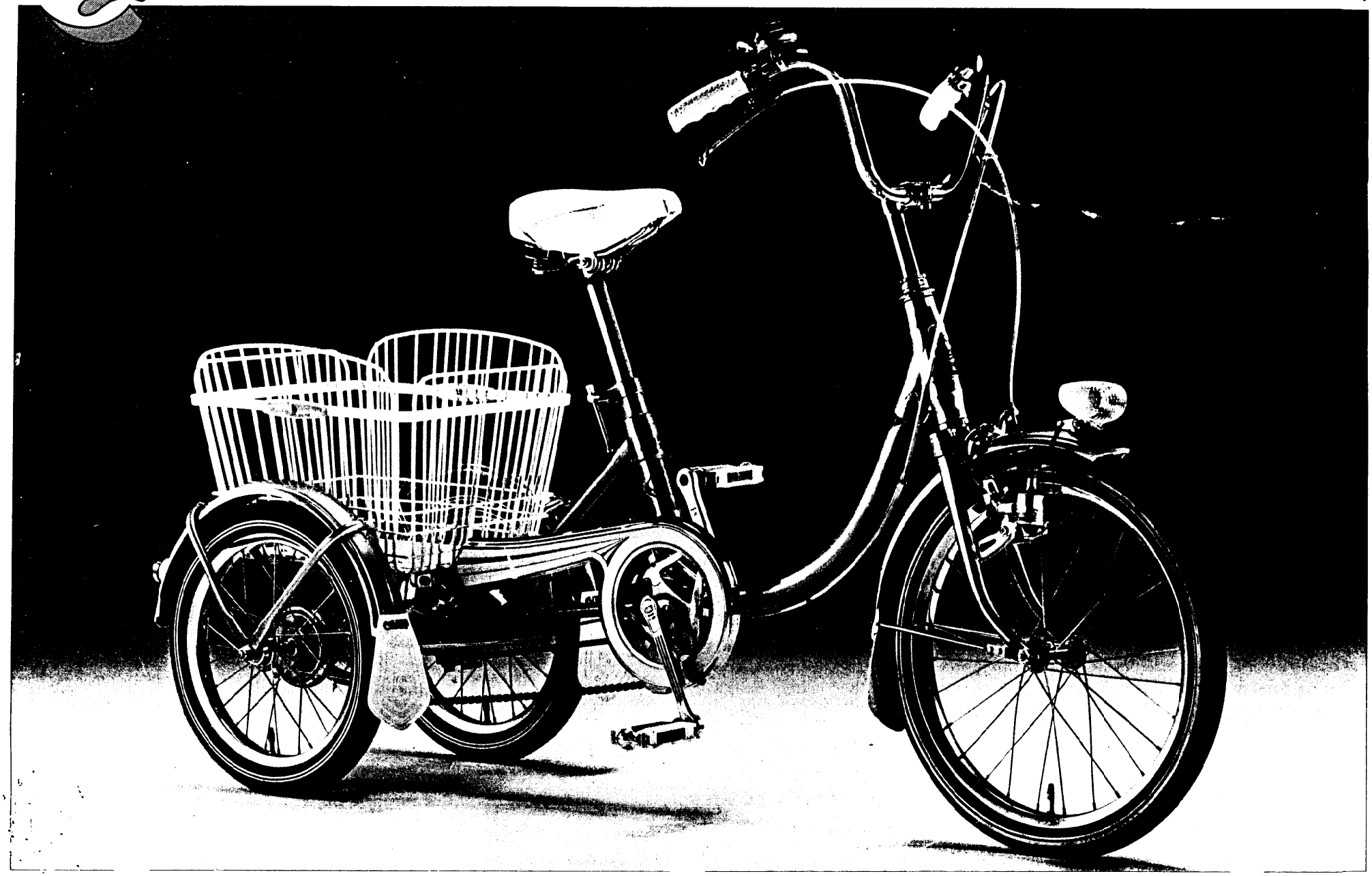
C. ITOH & CO. (AMERICA), INC.

Lewis W. Siegel
Legal Department

LWS:sf

Enclosure

RECEIVED
APR 10 1975
Consumer Product Safety Commission
Office of the General Counsel

Bridgestone Kabuki Picnica Wagon

(PW-1)