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U.S. CONSUMER PRODUCT SAFETY COMMISSION

WASHINGTON, D.C. 20207

#219

SEP 8 1975

Honorable James C. Cleveland
House of Representatives
Washington, D.C. 20515

Dear Mr. Cleveland:

This is in response to your July 28, 1975 letter which enclosed a copy of a June 18, 1975 letter from Richard F. Seyfried of Salem, New Hampshire. Mr. Seyfried is concerned that certain wafer locks manufactured by the [redacted] can be easily opened without a key. Our understanding of the potential safety hazard involved is that residents of homes which use these locks could become victims of criminals.

Locks used in homes are "consumer products" and therefore within the jurisdiction of the Commission. If "an unreasonable risk of injury [is] associated with" such locks or if a defect in the locks "creates a substantial risk of injury to the public" (see sections 7(a) and 15(a), respectively, of the Consumer Product Safety Act, copy enclosed), the Commission can undertake regulatory or enforcement action to eliminate or reduce the risk of injury.

Injury inflicted by criminals who enter homes by opening locks without using keys is not the type of injury which regulatory or enforcement action under the Consumer Product Safety Act is designed to reduce or prevent. This risk of injury is not "associated with" a lock under section 7 and this is not a defect in a lock which could "create a substantial product hazard" under section 15. If, in contrast, sharp edges on a lock used in homes presented a risk of injury to consumers, action under the Consumer Product

ADVISORY OPINION

Safety Act would be appropriate to reduce or prevent that risk.

The views expressed in this letter have been approved by the Commission.

Sincerely,

Michael A. Brown
General Counsel

Enclosure