June 21, 1973

[redacted]
President and Chief Executive Officer
[redacted] New Jersey [redacted]

Dear Mr. [redacted]

This is in response to your June 18 inquiry with regard to the coverage of the regulations governing the safety of electrically operated children's articles.

As provided by §191b.1(a)(1) of the regulations, components which are powered by circuits of 30 volts r.m.s. (42.4 volts peak) or less are excluded from the definition of "electrically operated toy or other electrically operated article intended for use by children". Consequently, such components are not subject to the precautionary labeling provisions nor to the other requirements of 21 CFR §191b.

Although the secondary circuit, or other component(s) of [redacted] power packs, may be at a potential of less than 30 volts r.m.s., the fact that the power packs are intended to be powered by electrical current from nominal 120 volt (110-125 v.) branch circuits brings them within the scope of the subject regulations (including the requirements dealing with precautionary labeling).

If you have any further questions, please let me know.

Sincerely yours,

Paul W. Hallman
Office of the General Counsel

Dzenitis/PWHallman:tdr:6/21/73

cc: D. Thome, Bureau of Compliance
S. Hart
P. Hallman

[redacted]

[redacted]

June 18, 1973

Paul W. Hallman, Esq.
Office of the General Counsel
Consumer Product Safety Commission
Washington, D. C. 20016

Dear Mr. Hallman:

Thank you very much for your May 30 letter.

We do have one question concerning your letter in which you state, "Components which are powered by circuits of 30 volts r.m.s. (42.4 volts peak) or less are not subject to the provisions. Thus, those train and car racing sets that do not include a transformer are not required to bear cautionary labeling."

Some of our engineers are confused - As you know, our power packs are less than 30 volts r.m.s. Are you saying that, in addition to model railroad and road racing sets which do not include transformers, any set containing a transformer of less than 30 volts is exempt from the cautionary labeling requirement?

We would appreciate your comments and thank you again for your courtesy.

Very truly yours,

[redacted]

LSS:bb

The transformer is a component which is powered by 30 volts or more.

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