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E: JAN 11 1974

Bureau of Compliance

M: General Counsel

JECT: Farm Tractor

This is in reference to your memorandum of December 11, 1973, in which you requested an opinion concerning whether, on the facts related in the attachments to your memorandum, the tractor in question is a "consumer product" within the meaning of section 3 of the CPSA.

On the basis of the information which you have submitted, we are unable to make a determination. In order to do so we need additional information on the subject tractor, particularly information indicating whether the tractor is an industrial product or a consumer product. Sales brochures for e.g. might be helpful in this regard.

It is clear, however, that tractors do not fall within the motor vehicle exclusion of section 3(a) of the Act (15 U.S.C. 2054). Thus, it must be determined whether a tractor falls within section 3(a)(1) of the Act.

AHSchoem:mli:1/9/74

cc: Executive Director
A. Schoem
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