



RECREATIONAL
OFF-HIGHWAY
VEHICLE
ASSOCIATION

February 8, 2016

Subject: ANSI / ROHVA 1-201X

Ms. Caroleene Paul
U.S. Consumer Product Safety Commission
Division of Mechanical Engineering
5 Research Place
Rockville, MD 20850

Dear Ms. Paul,

The Recreational Off-Highway Vehicle Association (ROHVA) has received your ballot on the proposed American National Standard referenced above. Your ballot was reviewed on December 17, 2015, again on January 22, 2016, and this response finalized on February 8, 2016.

Your ballot indicated an abstention and provided comment which is responded to below.

Comment – CPSC Staff Recommendation #1: Staff recommends that ROHVA form a task group after publication of the revised standard to develop and finalize the hang tag requirements. Staff will actively participate in such a task group.

Staff notes that the center of gravity height of a 95th percentile male in the seated position is approximately 10 inches above the seat, instead of the minimum 6 inches specified in the canvass draft, and 10 inches forward of the seat back.

Response: ROHVA is committed to work with the CPSC staff and others toward the development of more specific hang tag requirements. ROHVA disagrees with modifying the test occupant weight CG location. This location has been included in each iteration of the ANSI/ROHVA -1 standard since first published in 2010. The pass/fail criterion has been based on this location and has involved thousands of hours of valid testing. This CG location is also cited in other non-road vehicle standards such as ANSI/ILTVA Z130 – 2012 American National Standard for Golf Cars – Safety and Performance Specifications, ANSI/ILTVA Z135 – 2012 American National Standard for Personal Transport Vehicles – Safety and Performance Specifications, ANSI/OPEI B71.9 – 2012 American National Standard for Multipurpose Off-Highway Utility Vehicles, SAE J2258 DEC2010 – Surface Vehicle Standard for Light Utility Vehicles, and ANSI/ASME B56.8 – 2011 Safety Standard for Personnel and Burden Carriers.

Comment – CPSC Staff Recommendation #2: Staff recommends that the tilt table test methodology include the following to provide additional detail on the test methodology for evaluating TTA at TWL, reducing ambiguity and possible variances in the way the tilt table test is conducted:

- Test occupant weight equivalent requirements with the CG location for each occupant that is 10 inches above the seat and 10 inches forward of the seat back.

- A specific test procedure to measure the TTA at TWL for the operator plus passenger configuration.
- Clarification that the angle measurement of the tilt table needs to be with an accuracy of ± 0.1 degree.

Response: Please see ROHVA's previous response regarding CG location for test occupant weight. ROHVA agrees with adding a specific test procedure to measure tilt-table angle at two-wheel lift and has modified section 8.1 to accommodate this test. Additionally, tilt table measurement angle accuracy of ± 0.1 degree has been included.

Comment – CPSC Staff Recommendation #3: Staff recommends the following edit to the test methodology in the voluntary standard to improve the standardization of the test methodology:

Add - Section 10.2 Test Vehicle Configuration

h) The center of gravity of the instrumented and loaded test vehicle shall be within 0.5 inch of the center of gravity of the vehicle loaded with an operator and passenger configuration.

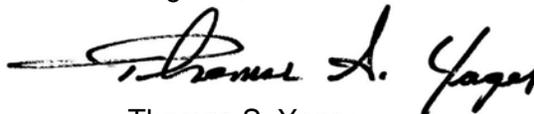
Response: Differences in vehicle design, vehicle configuration, and test equipment preclude requiring the CG be located within 0.5 inch for each test condition. The current procedure requires the instrumentation CG "to be located as closely as possible" to the test operator/passenger CG, which in some instances may exceed your recommendation, and in all instances will be as close as practicable.

Comment – CPSC Staff Recommendation #4: Staff recommends that ROHVA include a seat belt requirement for ELR with a locking angle determined by the manufacturer based on the vehicle's use, as recommended in the CPSC staff letter to ROHVA and OPEI on October 15, 2015.

Response: ROHVA agrees and has revised section 12.1 to include an ELR requirement except for non-retracting 4-point or greater occupant restraint. Additionally, the revised standard allows for seat belt anchorage to meet either SAE J2292 or SAE J383.

Thank you for taking the time to participate in the canvass ballot. A re-circulation ballot including accepted comments will be circulated in the near future.

Regards,



Thomas S. Yager
Vice President