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MFR/PRVLBR NOTIFIED 5/18/10
COMMENTS: __YES X NO
__OVERRULED; __ATTACHED
__EXCISIONS/FOIA Hxs. __;
X DO NOT RE-NOTIFY __RE-NOTIFY

November 19, 2009

ATV ACTION PLA N

Pacific Rim International West, Inc., hereafter referred to as "P.R.I.W." was incorporated in 2006 in the state of California. P.R.I.W. started out by importing and distributing four-wheel ATVs. Over the past three years, P.R.I.W. has expanded its product lines that cover offroad and onroad recreational vehicles, which include ATVs, go karts and scooters.

P.R.I.W. is fully committed to the goal of reducing ATV-related accidents. We have implemented new policies in accordance with the rules set forth by Section 232 of the Consumer Product Safety Improvement Act of 2008. The actions outlined below are part of our continuing effort to promote safe and responsible use of our ATVs.

I. Partner up with Industry Efforts

P.R.I.W. will continue to work with other ATV distributors and CPSC to promote ATV safe riding.

II. Age Recommendation

P.R.I.W. will not recommend, market, advertise, or sell new adult-sized ATVs for the use of persons less than 16 years of age. In addition, P.R.I.W. will use only the maximum speed and speed limitations specified at Section 6 of the ANSI/SVIA 1-2007 Standard for ATVs ("the ATV standard"). P.R.I.W. will use its best efforts, including monitoring dealers, to assure that P.R.I.W.'s retail dealers do not recommend or sell ATVs for use by individuals under the minimum age.

III. Training

P.R.I.W. will offer first-time purchasers and age appropriate members of their immediate families free hands-on training. P.R.I.W. will utilize the ATV Safety Institute (ASI) training course.

P.R.I.W. dealer will inform purchasers about training availability. P.R.I.W. will implement a number of methods to communicate available training to ATV

purchasers.

- Attaching adhesive labels to ATVs
- Attaching supplemental product documents

P.R.I.W. will email purchasers with information about registering for the ASI safety training. A toll-free phone no. will also be provided to contact ASI for registration.

By using the above methods, P.R.I.W. will inform the purchasers about the free ASI Safety Training courses. All registration cost will be reimbursed to the customer once the receipt for registration from ASI is presented.

After completion of the ASI course, the rider will qualify for an incentive worth $100. The $100 incentive for training will include at least $50 in cash, with the balance offered (at the customer's choice) as a rebate for already purchased safety equipment or a credit towards the purchase of new safety equipment.

IV. Toll Free Hotline

P.R.I.W. will provide and maintain a 24-hour toll-free hotline that meets all requirements of Section H.4 of the 1988 ATV Consent Decrees. The hotline will provide safety and training information, including but not limited to age recommendation.

V. Dealer Monitoring

P.R.I.W. requires that its dealers verify the intended ATV rider's age prior to selling that rider or his/her guardian an ATV. P.R.I.W. warranty registration cards require the identification of the intended rider's name and date of birth to ensure that dealers do not sell P.R.I.W. ATVs to under-aged riders.

P.R.I.W. will use its best efforts to obtain dealer compliance with the age recommendation requirements of the ATV Standard. P.R.I.W. will conduct on-site inspections of each of its authorized ATV dealers at least twice a year, with a minimum of 50 on-site inspections per year. These inspections will be conducted by means of independent, undercover investigators (also known as "secret shoppers") to ensure that these dealers follow age requirements and other safety related practices during sales or promotional functions. P.R.I.W. will also modify the visitation criteria of its field support staff so that inspecting for dealer compliance becomes a normal function of the dealer visit.

When P.R.I.W. learns of dealers who do not abide by the age requirements of the ATV Standard, it will arrange follow-up inspections. If P.R.I.W. finds evidence of continued violations, P.R.I.W. will take remedial actions, up to and including possible termination or non-renewal of the dealer's contract with P.R.I.W.

VI. Safety Video

P.R.I.W. will provide its dealers, agents or representatives a safety video to be provided at the point of sale to all retail purchasers of P.R.I.W. ATVs. The video will comply with all requirements described at Section H.3.b (4)(b) and paragraphs II.A and II.C. of Appendix I of the 1988 ATV Consent Decree.

Additionally, P.R.I.W. will use its best effort to require their retail dealers to make the safety video readily available for viewing by all actual and prospective ATV purchasers. The safety video will endorse the ATV operator training program and provides key safety and risk information, such as the importance of following the proper rider age recommendations.

VII. Safety Alert

P.R.I.W. will supply its dealers, agents, or representatives who sell ATVs "Safety Alert" documentation to be provided at the point of purchase to all retail purchasers of P.R.I.W. ATVs. The documents will contain the same substantive safety information as the Safety Alert described at Section H.3.b.(4)(c) and Appendix J of the 1988 ATV Consent Decree. This information includes: death and injury statistics for ATVs, safety rules, age recommendations, and the availability of safety training.

VIII. Marketing and Media

ATV advertising and promotional materials will include the substance of the safety messages described in Section J.1 and Appendix K of the 1988 ATV Consent Decree and will depict ATVs in a manner consistent with safe and responsible use of the product. All riders shown in such advertisements will wear helmets and full protective gear. P.R.I.W. will use its best efforts to promote dealer compliance with the advertising requirements.

IX. Information / Education Effort

For at least the next 10 years, P.R.I.W. will conduct the following Information and Education Program which will be directed primarily at providing safety information and at deterring children under age 16 from operating adult-sized ATVs.

In accordance with the "Safety Video" section as described above, P.R.I.W. will distribute a DVD that will convey safety messages in a manner that targets kid and teenage riders. The DVD will educate young riders to ride age-appropriate ATVs and not use the adult-sized ATVs. This DVD will be provided to all ATV purchasers.

P.R.I.W. will design and disseminate its original safety posters, flyers and booklets. (See Exhibit A for Sample of educational flyer) These posters, flyers or booklets will be available at dealerships that sell P.R.I.W. ATVs and readily available for all ATV purchasers.

P.R.I.W. will expand its website and include safety messages. The DVD will be available for view on the website. Other safety information will be included and updated as well on P.R.I.W.'s website.

P.R.I.W. will sponsor a safety ad campaign. P.R.I.W. will run ads in major ATV enthusiast magazines and websites. The ads will run continuously throughout the year. The ads will promote safe riding and age recommendation. Our budget for the print and website ad campaign will be a minimum of $15,000.00 per year for 10 years, as long as P.R.I.W. imports and/or distributes ATVs.

X. <u>ATV Labels and Safety Hang Tags</u>

P.R.I.W.'s Labels will conform to Section 4.23 of the ATV standard.
P.R.I.W.s Hang Tags will conform to Section 4.24 of the ATV Standard and will include information about free, hands-on ATV training availability.

XI. <u>Operator's Manual</u>

P.R.I.W.'s Operators manual will conform to Section 4.21 of the ATV Standard.

XII. <u>Notification</u>

Unless otherwise indicated, P.R.I.W. will maintain the above-specified actions indefinitely. P.R.I.W. will provide information about these activities upon request from the CPSC. P.R.I.W. will notify the agency at least 60 days prior to materially changing or terminating any of these activities.

XIII. <u>Conclusion</u>

P.R.I.W. is committed to promote the safe and responsible use of ATVs. We support the safety messages of the Consent Decree and the ATV Standard.

P.R.I.W. will not limit its effort in promoting safety in ATV riding to potential buyers and operators, but will extend this effort to our internal staff and dealers. We look forward to establishing and maintaining a long-term relationship with CPSC staff.

Pacific Rim Int'l West

Harry Chang
President

Exhibit A Sample of Educational Flyer