

MODE = MEMORY TRANSMISSION

START=JAN-29 14:55

END=JAN-29 14:56

FILE NO. = 039

STN NO.	COM	ABBR NO.	STATION NAME/TEL.NO.	PAGES	DURATION
001	OK	8	914194464902	003/003	00:00'46"

-CPSC COMPLIANCE -

***** -301 504 0359 - ***** - 301 504 0359- *****



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

RECALLS AND COMPLIANCE DIVISION

TEL: 301-504-0608

FAX: 301-504-0359

DATE: 1/29/99 PAGES TRANSMITTED 2 + cover

TO: Kevin Sauder

TITLE: _____

OFFICE: Sauder Woodworking

FAX #: (419) 446-4902

FROM: Judith Hayes

REMARKS: TV Cauts

Confirmation copy to follow by U.S. Mail

Fax Transmission Only

NOTE: If all pages are not received, or if you have problems with this transmittal, please contact the person listed above.

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278

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Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502

Phone: 800-537-8560
419-446-2711

Fax: 419-446-4902

Fax Transmission

Date: January 18, 1999
To: Judith Hayes
Co. Name: U S Consumer Product Safety Committee

From: Kevin Sauder
Subject:

No. of Pages: 2
(including cover)

A handwritten signature in black ink, appearing to be "K. Sauder", is located in the bottom right corner of the page.



Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502

419-446-2711

January 15, 1999

Ms. Judith P. Hayes
Senior Compliance Officer
U.S. Consumer Product Safety Committee
Washington, D.C. 20207

Re: CPSC CA980039
Sauder Woodworking Co.
Television Cart Model 5155

Dear Ms. Hayes:

Thank you for your letter of January 8, 1999 regarding the proposed retrofit of the Model 5155 television cart. Per the suggested alternatives set forth in your letter, we propose to address the "consumer motivation" issue raised by CPSC by:

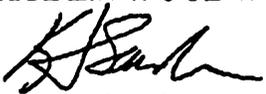
1. Providing a postage paid shipping envelope for use by the consumer to return one of the casters from the unit to Sauder; and,
2. Rewarding the consumer by forwarding a \$5 Sauder product gift certificate upon our receipt of the caster.

We believe that the return of one of the casters will demonstrate application of the retrofit kit to the product, inasmuch as the cart will not be usable with only three casters remaining in place.

We look forward to hearing from you to finalize the proposed corrective action program for the Model 5155. If you have any questions, please contact me.

Sincerely,

SAUDER WOODWORKING CO.


Kevin J. Sauder
Executive Vice President





U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

RECALLS AND COMPLIANCE DIVISION

TEL: 301-504-0608

FAX: 301-504-0359

DATE: 11/8/99 PAGES TRANSMITTED 2 + cover

TO: Kevin Sauder

TITLE: _____

OFFICE: Sauder Woodworking

FAX #: (419) 446-4902

FROM: Judith Hayes

REMARKS: television carts

Confirmation copy to follow by U.S. Mail

Fax Transmission Only

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U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207-0001

OFFICE OF COMPLIANCE
Recalls and Compliance Division

Judith P. Hayes
Senior Compliance Officer
Tel: 301-504-0608, ext. 1355
Fax: 301-504-0359

January 8, 1999

Via Fax (419) 446-4902

Certified Mail
Kevin Sauder
Executive Vice President
Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502

Re: CPSC CA980039
Sauder Woodworking Co.
Television Cart Model 5155

Dear Mr. Sauder:

Our staff recently completed its review of Sauder's proposed retrofit kit to address the potential hazard of tip over associated with the model television cart 5155.

As you are aware, our engineering staff tested the use of the retrofit kit #2 applied to the originally designed model 5155 (kit #2 includes the use of a molding strip 1.43 inch in width, as opposed to the retrofit kit #1 which includes a molding strip 1 inch in width). Retrofit Kit #2 passed the UL Standard 1678, with the casters removed and tack glides applied.

The evaluation of a firm's retrofit program also entails how likely a consumer will install the retrofit kit and perform all the actions associated with the use of the retrofit kit. Sauder's proposed corrective action program includes the application of the 1.43 inch molding strip #2, removal of the originally installed casters and application of tack glides; actions to be performed in the home by the owner. Cost to the user, in terms of time, effort, money and convenience is probably the most important variable that will influence whether consumers will install a retrofit kit. The mobility of the television cart 5155 is a feature that likely influenced its purchase. The proposed corrective action program, however, requests that consumers reduce the utility of the cart which retails for \$50 to \$60. Doing so would require

considerable time and effort, not to mention the physical discomfort from handling a heavy load, and will leave the consumer with a less desirable product. Given that the proposed program would entail costs to the user and loss in the utility of the product, it appears unlikely that consumers will remove the casters and the product will continue to pose a tip over hazard. Therefore, even though the retrofit kit #2 passed the UL Standard 1678, the use of the retrofit kit #2 is not acceptable unless the casters of the originally designed model 5155 are removed by the consumer.

Our staff is uncomfortable with the determination that consumers will not remove the casters. In turn, we are not able to accept Sauder's proposed corrective action program. Therefore, we would like to suggest that Sauder consider the following options:

1. Provide our staff with a form of assurance that consumers will remove the casters. Offer consumers a form of incentive to perform the action, such as a gift certificate or cash prize for returning the casters to Sauder or a retailer.
2. Develop a retrofit kit that would pass UL 1678 not requiring consumers to remove the casters.
3. Recall the model 5155 television carts from consumers homes, offering a replacement model or a refund of the purchase price.

In addition to the approve listed options, we are willing to take into consideration any other forms of corrective actions that Sauder may recommend. Please provide a response to this matter by Tuesday, January 19, 1999.

We appreciate the cooperation that Sauder has provided thus far in our staff's investigation, and we look forward to working with you further to resolve this matter. Thank you.

Sincerely,

Judith Hayes
(301) 504-0608, ext. 1355

284

MODE = MEMORY TRANSMISSION

START=JAN-08 12:29

END=JAN-08 12:30

FILE NO. = 127

STN NO.	COM	ABBR NO.	STATION NAME/TEL.NO.	PAGES	DURATION
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-CPSC COMPLIANCE -

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U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

RECALLS AND COMPLIANCE DIVISION

TEL: 301-504-0608

FAX: 301-504-0359

DATE: 11/8/99 PAGES TRANSMITTED 2 + cover
 TO: Kevin Sauder
 TITLE: _____
 OFFICE: Sauder Woodworking
 FAX #: (419) 446-4902

FROM: Judith Hayes

REMARKS: television carts

- Confirmation copy to follow by U.S. Mail
- Fax Transmission Only

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O'Sullivan Industries, Inc.

December 7, 1998

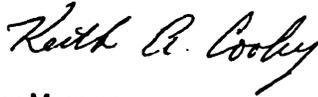
Judith Hayes

Dear Ms. Hayes:

This letter is in response to your request for an explanation of an O' Sullivan design intent. We had asked for any suggestions regarding the addition of a molded rail that would be attached at a specified dimension from the front edge of the TV shelf to serve as a stop for the TV. During our discussion, you mentioned that the CPSC had not made a decision regarding the use of such a rail as a stop. Since our discussion, we have redesigned the units, and therefore eliminated the need for the stop rail. We would still appreciate any decisions made regarding this design intent, as we may still have an interest in this design intent in the future.

Sincerely,

Keith A. Cooley



Product Engineering Manager

98 DEC 17 10:10

CPSC

copy

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Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502

419-446-2711

November 20, 1998

Ms. Judith P. Hayes
Senior Compliance Officer
U.S. Consumer Product Safety Commission
Washington, DC 20207

CPSC
1
NOV 23 1998

Dear Ms. Hayes:

Sauder Woodworking Co. ("Sauder") is continuing to move forward with its plan to undertake the recall of Units 5155, 5055, and 5251, according to CPSC guidelines. We continue to await the review of the proposed retrofit kit by CPSC staff, so that this project may move forward. As we have discussed, we hope to coordinate the timing of any public information phase with a similar effort by Bush Industries.

It is our general understanding that the procedure to be followed with respect to this retrofit campaign is as follows:

1. CPSC staff will review and approve of the retrofit kit proposed by Sauder with respect to the affected models.
2. CPSC staff and Sauder will agree upon the form of press release to be issued with respect to this recall, and its distribution.
3. Sauder will implement the recall by making the retrofit kit available to its customers (via an 800 number program) as agreed upon between Sauder and CPSC staff.

As noted above, we are awaiting CPSC staff review of the proposed recall kit, which we understand to be the first step in moving this project forward. It is also our understanding that as a part of our agreement, Sauder and CPSC will enter into a written voluntary corrective action plan that sets forth the details of our agreement.

As we have discussed, Sauder is anxious to move forward to implement this program, and we look forward to hearing from CPSC with respect to the approval of the proposed retrofit kit and the details of the recall program. As part of our final agreement, it is important to Sauder from both a public announcement and timing standpoint that this effort be coordinated as a part of an overall industry effort. Sauder Woodworking should not be penalized by being the first company in the industry to work with CPSC on this issue, thus receiving the majority of any adverse publicity surrounding this effort.

Although not a part of the recall program with respect to units 5155, 5055, and 5251, Sauder is proceeding with an internal program to review its other TV carts and stands to determine their safety with respect to tip over events, as a part of an overall effort to identify any substantial product hazards with respect to existing units and to continue our overall efforts to improve the safety of future products. Our review will include an analysis of UL 1678 compliance, as well as product-related incidents and injury claims, with appropriate reporting to CPSC under Sections 15(b) and 37 of any "substantial product hazard" as defined by the Consumer Product Safety Act and CPSC guidelines. We are also making an effort to review the current consensus standards applicable to these products to determine whether a new standards-making effort should be initiated to develop better safety standards for these products.

I look forward to hearing from CPSC regarding the recall of units 5155, 5055, and 5251, and to moving forward with that project. If you have any questions in the meantime, please contact me. Thank you.

Sincerely,

SAUDER WOODWORKING CO.



Kevin J. Sauder
Executive Vice President

285



502 Middle Street, Archbold, Ohio 43502

Tel: (419) 446-3762, Fax: (419) 446-3444

E-mail: ddietrich@sauder.com

From the desk of David M. Dietrich
Product Test Lab Manager

FAX COVER SHEET

Date: October 8, 1998

To: Judith Hayes

Company Name: US Consumer Product Safety Commission

Subject: Sauder Test Results for the unit 4155 (134155 & BS55 all the same)

Number of pages
including cover sheet: 3

289



10/07/98

Product Testing Laboratory -- Unit Tests

UNIT STYLE: TV STAND

MODEL # AND NAME 134155 TV Stand / General Furniture

Relative Humidity %	INSIDE 53%	OUTSIDE 97%	Test Manual Revision Date: 06/01/98
Temperature: (°F) (°C)	71 21.7	59 15.0	

Unit Weight (pounds)	48	Height (inches): Depth (inches):	24.25 15.75	Door Projection: (inches)	11.38
					L-2.0 0.35 x sq.in.
Swivel Top	WIDTH 28.25	DEPTH 15.75	THICKNESS 5/8 inch	SQ. IN. 444.938	155.73
Fixed Shelf	26.88	14.50	5/8 inch	389.688	136.39
Bottom	26.88	13.88	5/8 inch	372.891	Usable 130.51

Test Results

STABILITY

S-2.1 TELEVISION UNIT STABILITY (UL - 1678, Third Edition: July 29, 1998)

To evaluate the stability of a furniture unit designed specifically to support a household television loading using the appropriate calibrated UL Test Jig setup for the designated TV size and weight.

	Simulated
Swivel Top	25-27" TV - 95 LB
Fixed Shelf	No Load
Bottom	No Load

Recommended Maximum TV Size 27" TV - 95 LB

Results

	Simulated	
Tip-over Angle*	Doors Closed 10.6°	UL 1678 TV Test Jig Calibration Jig Tip Over 20.8° Total Jig Mass: 95.22 LB

PASS

Caution Label # to be applied: 226022. Safety bracket hardware not to be included. Remove TV before moving text. Anti-skid pad, # 237758, to be included.

Note: All loads centered and distributed unless stated otherwise.

290

10/07/98

Note: All loads centered and distributed unless stated otherwise.

STRENGTH

L-1.0 APPURTENANCE LOADING

50 lbf. through a 2 in. dia. disc for 1 minute on 90° open door.

PASS

L-2.0 HORIZONTAL SURFACE DEFLECTION (30 minutes+)

RL = (AD/MD*L)/2

AD = shelf span/180

	SQ. IN.	Load Used	AD	MD	RL	Instruction
Top	444.938	150	0.14931	0.0495	226.22	Booklet Load
Fixed Shelf	389.688	100	0.14931	--	--	27" TV 95 LB
Bottom	372.691	100	0.14931	--	--	35 LB
						50 LB

TEST DONE

L-3.0 SHELF and TOP STRENGTH

Load: 0.6 lb. per inch tape shelf length, and 0.35 lb./ sq. in. per horizontal surface:

	Load 35 LB	Used	15 min.
Swivel Top	155.73	250	
Fixed Shelf	136.39	125	
Bottom	130.51	125	

L-3.0.5 TOP STRENGTH- CONCENTRATED LOAD

SQ. IN.
 Top 444.94
 Top <41 inches from floor and top <4 sq. ft.: 250 lb.. on 12 inch loading disc for 15 minutes.

TEST DONE

L-6.0 CASTER RETENTION

5 lb. in most severe direction = 1 minute.
Feet tested as casters.

PASS

L-8.0 RACK TEST

45° for 30 minutes left and right side.

PASS

SAFETY ISSUES

C-1.0 SHARP EDGE/ CORNER ANALYSIS

All representative edges and corners of finished unit checked with Set-50 sharp edge tester.

PASS

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U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

RECALLS AND COMPLIANCE DIVISION

TEL: 301-504-0608

FAX: 301-504-0359

DATE: 10/8/98 PAGES TRANSMITTED 2 + cover

TO: Frank Vitaliti

TITLE: _____

OFFICE: FS Lab

FAX #: 301-413-#07017

FROM: Judith Hayes

REMARKS: Sanders testing of
prototype

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Handwritten signature



502 Middle Street, Archbold, Ohio 43502

Tel: (419) 446-3762, Fax: (419) 446-3444

E-mail: ddietrich@sauder.com

From the desk of David M. Dietrich
Product Test Lab Manager

FAX COVER SHEET

Date: October 2, 1998

To: Judith Hayes

Company Name: US Consumer Product Safety Commission

Subject: Re: CPSC CA980039
Information requested in October 1, 1998 fax transmission following
the September 22, 1998 meeting. Attached is: 1. Tip test protocol,
and 4. Active units 1/1988 - 6/1998.
We have also evaluated the Draft 1 of the 5155 Repair Kit. Please
review Draft 2 and the improvements. (See steps: 5 & 6, and the
SIDE VIEW Diagram for the Swivel Top Molding)

Sauder Woodworking Company

Stability Test – Product Testing Laboratory
Television Unit Stability

October 2, 1998

Test Procedure:

1. Identify the unit by a model number or prototype identifier.
2. Establish the recommended TV size for this specified unit.
3. Calibrate the Test Fixture to UL 1678 for representative TV size. (Section 13 and Table 1)
4. Place the unloaded unit on the tip testing table.
5. Place the unit in most unstable condition as defined by UL 1678, Section 15.
6. Place the Test Fixture on the unit at the front most position of the TV shelf, which supports the entire base of the Test Fixture. (See Figures 13.1-3
7. Gradually increase the angle of the tip-table until tip over of the unit begins, and would be completed.
8. Record this value in degrees.
9. Compare the value to the acceptance level of 10 degrees stated in UL 1678, Section 15.1.
10. The unit must exceed 10 degrees.

UL 1678 Standard for Household, Commercial, and Professional-Use Carts and Stands, Third Edition: July 29, 1998.

Sauder Woodworking Company

Stability Test – Product Testing Laboratory
Television Unit Stability

October 2, 1998

Product Selection Priority Process for Tip Test:

- A. Television Carts and Stands
 - 1. New Units
 - 2. Current production units with the most recorded tip incidents from the Product Safety Committee Incident Report.
 - 3. Units with the highest sales volume, in quantity of units sold.
 - 4. All other active items.

- B. Entertainment Centers, Wall Entertainment Systems, and Home Theaters and Armoires.
 - 1. New Units
 - 2. Current production units with the most recorded tip incidents from the Product Safety Committee Incident Report.
 - 3. Units with the highest sales volume, in quantity of units sold.
 - 4. All other active items.

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5155 REPAIR KIT - Draft 2

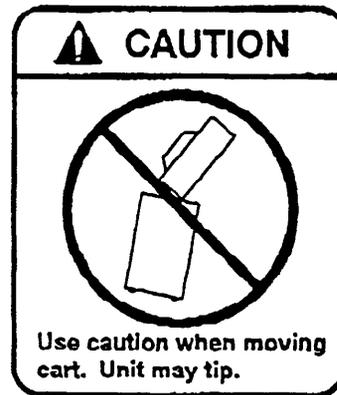


Parts and hardware included in this kit:

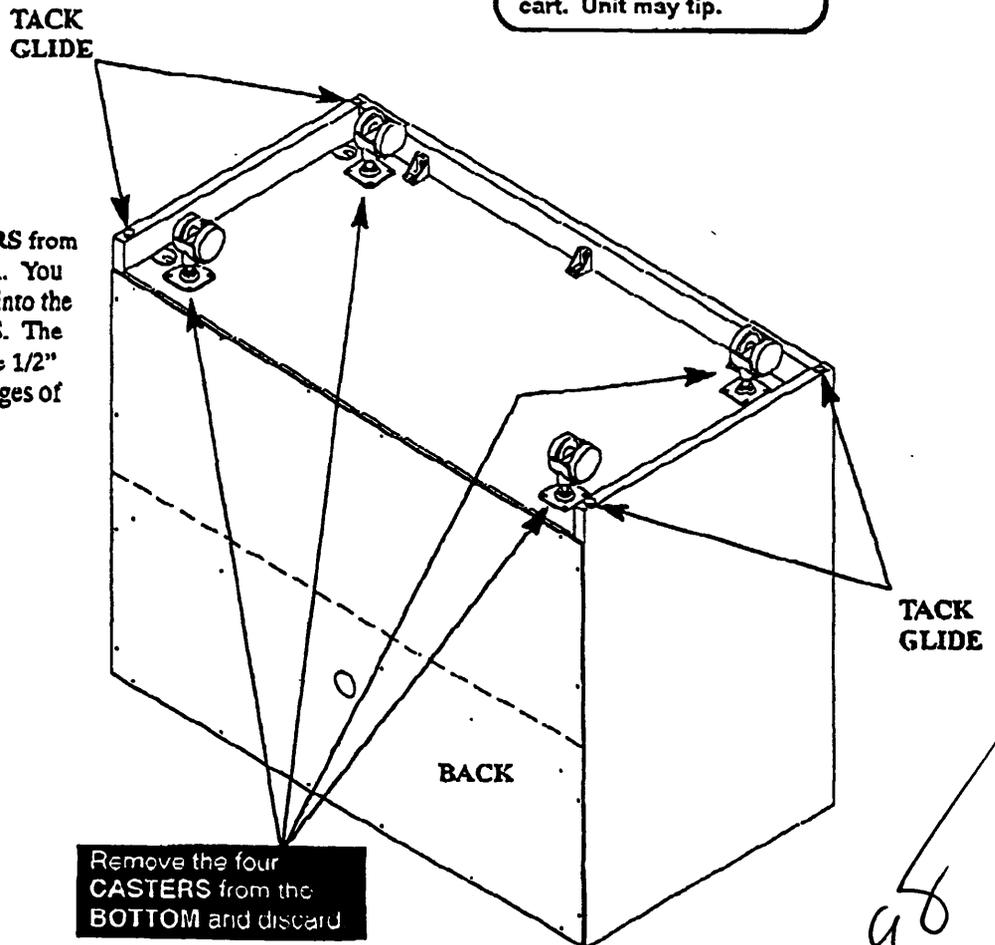
- 1 Swivel Top Molding
- 4 Tack Glide
- 1 Tape-card
- 1 Caution Label

1 Completely unload your unit.

2 If your unit does not have a caution label affixed to it, apply this label to the BACK.

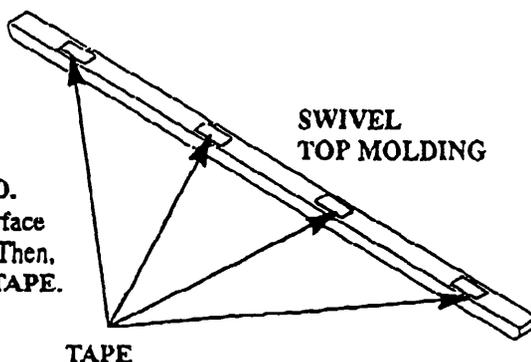


3 Remove the four CASTERS from the BOTTOM and discard. You may tap TACK GLIDES into the bottom edges of the ENDS. The TACK GLIDES should be 1/2" from the front and back edges of each END.

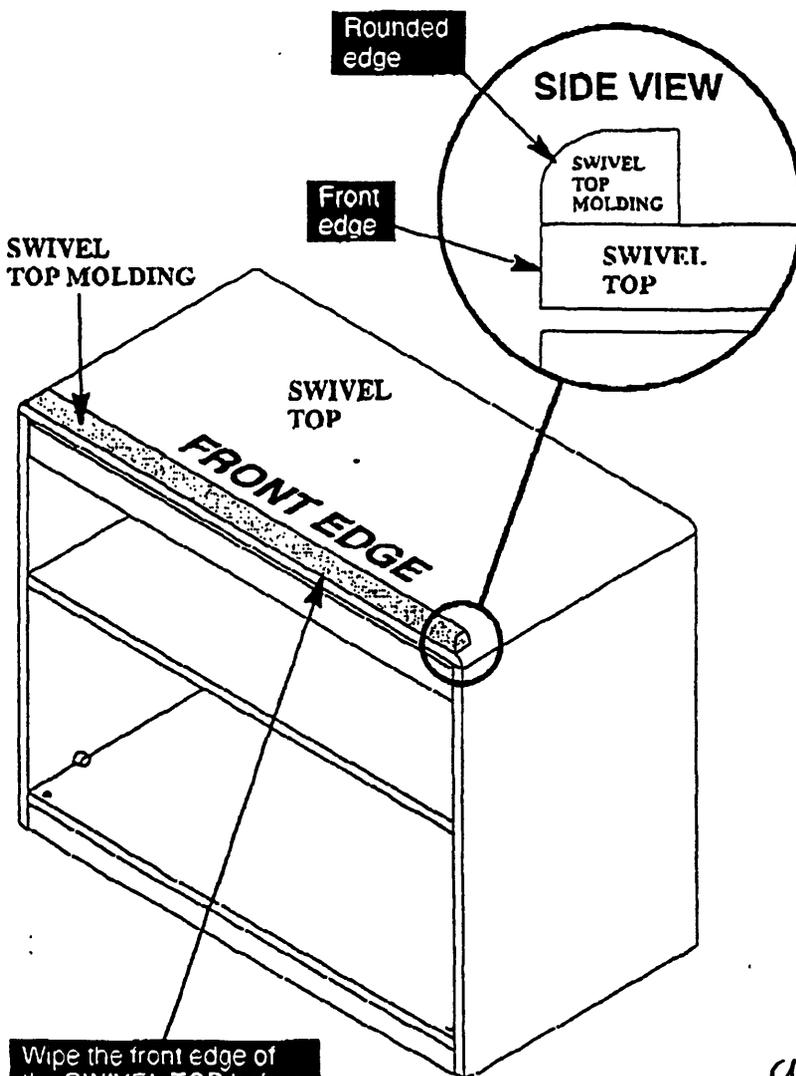


- 4 Use a clean dry rag to clean the **SWIVEL TOP** and **SWIVEL TOP MOLDING** where the **TAPE** will be applied.

- 5 Peel the **TAPE** from the **TAPECARD**. Stick the **TAPE** on the unfinished surface of the **SWIVEL TOP MOLDING**. Then, peel the backing from each piece of **TAPE**.



- 6 Use extra care while sticking the **SWIVEL TOP MOLDING** to the front edge of the **SWIVEL TOP**. The **SWIVEL TOP MOLDING** should be evenly spaced from side to side on the **SWIVEL TOP** and even with the front edge. Push down firmly on the **SWIVEL TOP MOLDING** after it is in the proper location.



Wipe the front edge of the **SWIVEL TOP** before sticking the **SWIVEL TOP MOLDING** to it.

299

MODE = MEMORY TRANSMISSION

START=OCT-01 10:11

END=OCT-01 10:12

FILE NO. = 136

STN NO.	COM	ABBR NO.	STATION NAME/TEL.NO.	PAGES	DURATION
001	OK	S	914194464902	003/003	00:01'03"

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U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

RECALLS AND COMPLIANCE DIVISION

TEL: 301-504-0608

FAX: 301-504-0359

DATE: 10/1/98 PAGES TRANSMITTED 2 + cover

TO: Kevin Sander

TITLE: _____

OFFICE: _____

FAX #: (419) 446-4902

FROM: Sudith Taylor

REMARKS: TV carts, stands and
port. centers.

Confirmation copy to follow by U.S. Mail

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Handwritten initials/signature



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

RECALLS AND COMPLIANCE DIVISION

TEL: 301-504-0608

FAX: 301-504-0359

DATE: 10/1/98 PAGES TRANSMITTED 2 + cover

TO: Kevin Sander

TITLE: _____

OFFICE: _____

FAX #: (419) 446-4902

FROM: Judith Hayes

REMARKS: TV carts, stands and
pub. centers.

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U. S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D. C. 20207-0001

OFFICE OF COMPLIANCE
Recalls and Compliance Division

Judith P. Hayes
Senior Compliance Officer
Tel: 301-504-0608, ext. 1355
Fax: 301-504-0359

October 1, 1998

VIA FAX (419) 446-4902

Kevin Sauder
Executive Vice President
Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502

Re: CPSC CA980039
Sauder Woodworking Co.
Television Carts, Stands and Entertainment Centers

Dear Mr. Sauder:

Thank you for the meeting of September 22, 1998, with our staff. As discussed at the conclusion of our meeting, the following items are to be implemented by Sauder and our staff, respectively. If there are any questions concerning these items, please do not hesitate to contact me.

1. Sauder is to submit an outline of its tip stability test protocol to be used to test its active models of television carts, stands and entertainment centers. Our engineering staff is to review the test protocol in accordance with the voluntary standard UL 1678 and recommend any necessary changes. At this writing, we have not received this information. Please submit it as soon as possible.
2. Once Sauder's test protocol is reviewed by our staff, Sauder is to test all its active models of television carts, stands and entertainment centers to verify compliance with the UL 1678. The test results are to be submitted to our staff for review.
3. Our engineering staff is to test Sauder's proposed corrective design of the model 5155 television cart. At this writing this testing has not been completed. Results of the testing will be submitted to Sauder as soon as its completed.

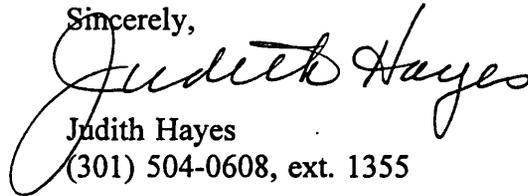
A handwritten signature in black ink, appearing to read "JPH", is located in the bottom right corner of the page.

4. Sauder is to submit a list of its currently active model carts, stands and entertainment centers. Please include the dates of distribution and the number of units distributed.

5. Once Sauder's proposed corrective design of the model 5155 cart is approved by our engineering staff, Sauder is to implement a corrective action program to address those units in consumer hands, retail and distributor inventory. The corrective action program is to include various forms of public notice, such as, a joint press release, retail posters and a video news release.

Please submit the requested information in items number 1 and 4 by Monday, October 5, 1998, in order that we may proceed with this matter in a timely manner. Thank you.

Sincerely,



Judith Hayes

(301) 504-0608, ext. 1355

303

Sander ^{ates} ~~ates~~ ^{closed} ~~closed~~ 2/21/98 (1)

- 1,189,000 units dist 1989-present
- warning label on back of unit since 5/93
- UL used only after '96
- models prior to '96 not tested under UL unless we initiated an investigation, i.e. #5155 tested under UL after we contacted firm. in 5/98.

- modifies but
UL tip
using actual
TV's + VCR's

#5155 test dates
1/98 ES tested failed UL
5/20/98 Firm tested via UL passed?

- Pad has used anti-skid pad since 6/97
- designated for use w/ carts, stands + ext. center intro. after 6/97
 - carts w/ casters manuf. prior to 6/97 had anti-skid pad added in subsequent manuf. runs

Non-swivel Casters - criteria for use ^{non skid casters} ^{#5155} ^{price} 193

- TV/VCR carts designed for normal functional use w/ TV's - what about stands are only carts to rec. non-swivel casters

5155 has casters to remain installed on unit
- changed to non swivel in 12/93
recomm. size TV - no larger than 27" TV
weighing 95 lbs. or less

Firm's Tip test

- modified version of UL stability test
- uses actual TV's + VCR's
- does not use weight load

Quest. How does this affect actual use for cons.
 does firm have weight recomm. for each TV card, stand

Three methods of testing model 4551

(1) simulates how a cons. would actually use the unit

1. actual TV of recommended size (how is this determined)
2. a VCR
3. weight on bottom shelf to simulate magazines + books

How is recomm. weight determined

(2) tests unit using sand bags of max. weight recomm. for each shelf (would sand bags rep. actual center of gravity)

(3) tests unit unloaded

Quest. Are these three methods used w/ every model tested

Quest. Would apply weight, VCR + Books, change the center of gravity (more weight at bottom) + therefore... the... potential...

cont.

Quest. As w/ the UK tip test, no weight is added to bottom, weight w/ TV at higher center of gravity, ~~is~~ resulting in more potential to tip?

~~Cont.~~

- firm considering discontinuing sales of #5155 due to end of market life. (mentioned in 8/28/98 ltr).

firms proposed CAP to date - letter of 8/28/98

- work w/ CPSC to explore ways to continue to improve stability of furniture models
- involve other manuf. in an industry wide study to develop new guidelines for design.
- use new industry guidelines on all future product design

* What specific actions - are they going to use UK as written? or modify?

- Are they willing to test all prior '96 models?

* What criteria supports their allegation that in-house protocol is appropriate?

Test procedures

- Firm's protocol
 - what does it consist of?
- Firm's test results
 - ~~discrepancies~~
 - UK fire stability test procedure
 - discrepancies bet. theirs + ours

CAP proposal

- ~~Firm's propo~~
- Staff's proposal
 - recall, replace, retrofit 5155
 - remove casters?
 - we would have to test w/ no casters
 - test all models using 1678 UK
 - provide test results to Staff
 - stop sales + dist. of all models not complying to UK 1678 until they are modified to comply

stop sales + dist.

- Firm's proposal
- Incidents
- Likelihood
- Clarify firm's ~~the~~ test use of UK

207



Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502

419-446-2711

September 29, 1998

Ms. Judith P. Hayes
Senior Compliance Officer
United States Consumer Product Safety Commission
4330 East West Highway
Bethesda, Maryland 20814

RE: CPSC CA980039
Sauder Woodworking
Television Cart Model 5155

Dear Ms. Hayes,

Enclosed is the proposed revision kit for the Sauder 5155. We are open to any suggestions, to the included instruction draft, in how better direct the consumer. We are able to print these at Sauder, once they meet with your approval. All the parts included are actual parts specifically for this application.

We have begun the testing process of all current Sauder production units that are recommended for televisions. The testing is according to UL 1678 and our September 22, 1998 conversations.

We have begun the design process to positively locate the Non-Swivel casters with only one possible orientation for direction.



DO NOT REMOVE THIS LABEL

226022

ttcr9-29-5...muc

*samples to
Frank V. on
10/9/98 - hand
delivered. To test
kit on 10/9 in
afternoon. me
10/7*

308

5155 REPAIR KIT - Draft 1



Parts and hardware included in this kit:

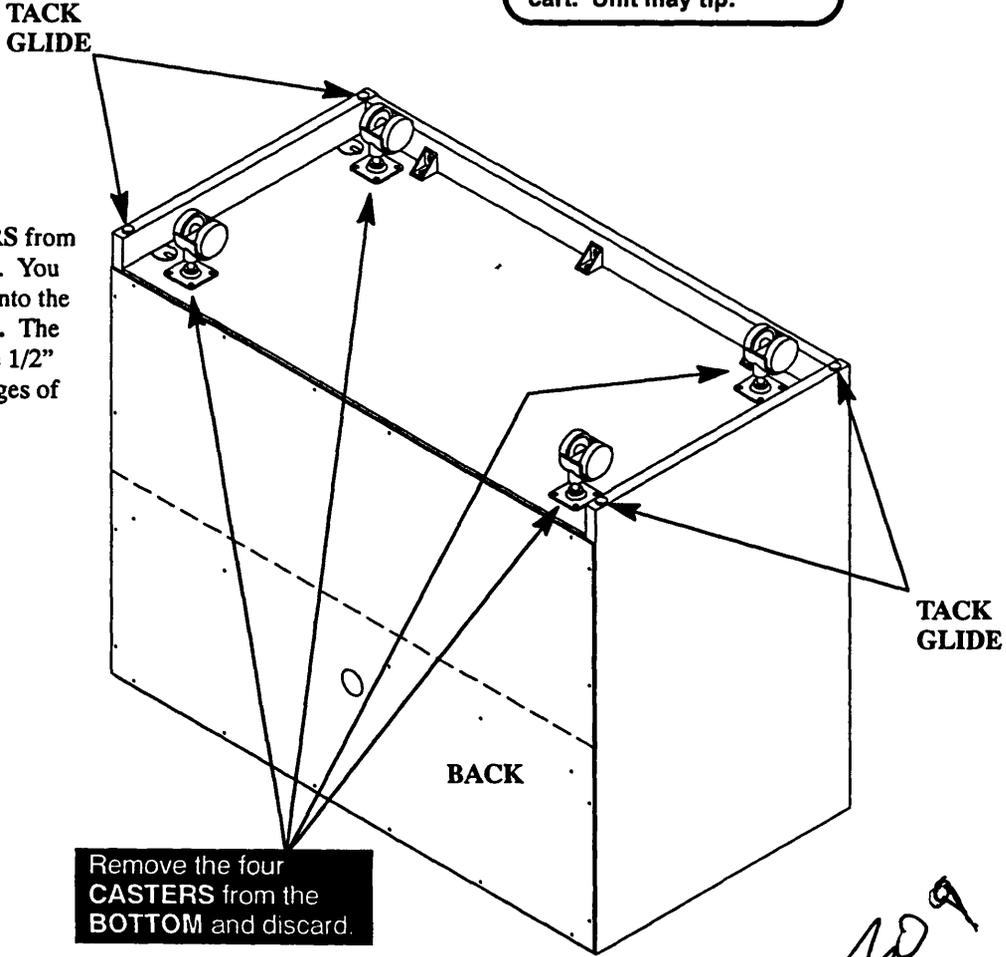
- 1 Swivel Top Molding
- 4 Tack Glide
- 1 Tape card
- 1 Caution Label

1 Completely unload your unit.

2 If your unit does not have a caution label affixed to it, apply this label to the BACK.



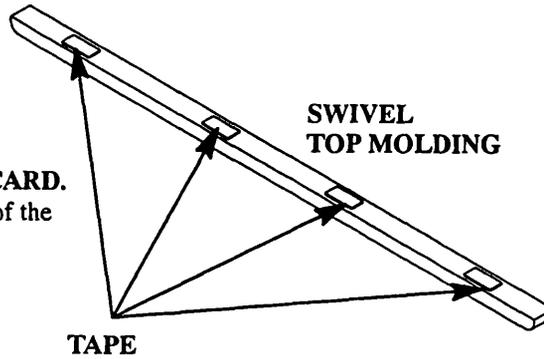
3 Remove the four CASTERS from the BOTTOM and discard. You may tap TACK GLIDES into the bottom edges of the ENDS. The TACK GLIDES should be 1/2" from the front and back edges of each END.



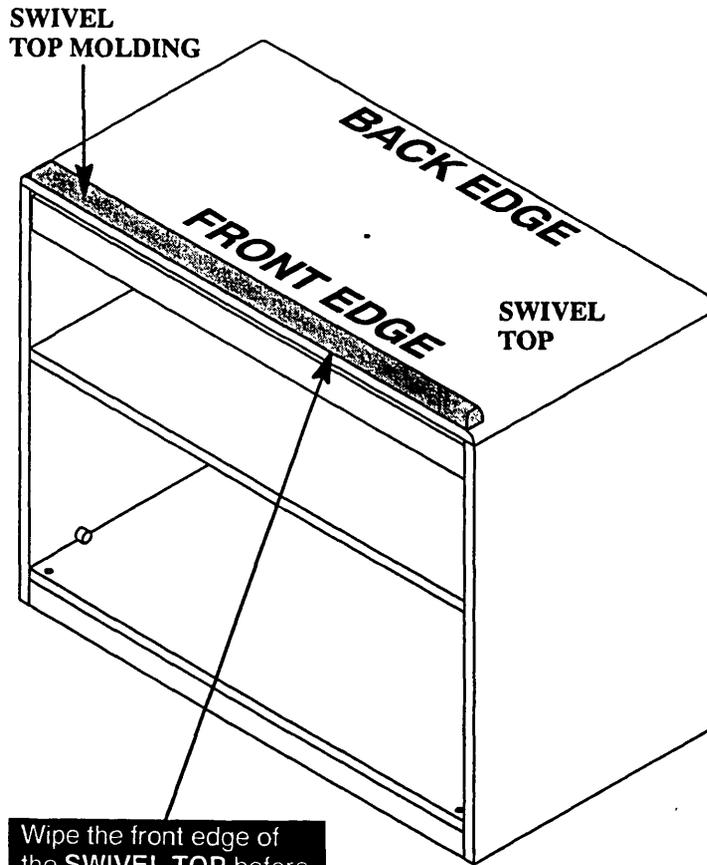
209

- 4 Use a clean dry rag to clean the **SWIVEL TOP** and **SWIVEL TOP MOLDING** where the **TAPE** will be applied.

- 5 Peel the **TAPE** from the **TAPECARD**. Stick the **TAPE** on the flat side of the **SWIVEL TOP MOLDING**.



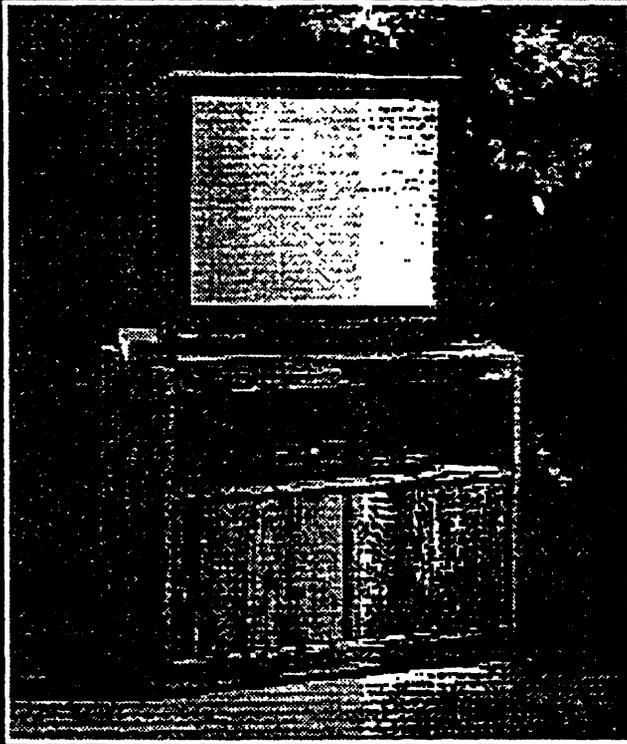
- 6 Use extra care while sticking the **SWIVEL TOP MOLDING** to the front edge of the **SWIVEL TOP**. The **SWIVEL TOP** should be evenly spaced from side to side on the **SWIVEL TOP**.



Wipe the front edge of the **SWIVEL TOP** before sticking the **SWIVEL TOP MOLDING** to it.

210

- Swivel top accommodates most 27" TVs
- Spacious shelf for VCR
- Doors open with magnetic touch-latches
- Hidden casters
- Ready to assemble with Sauder concealed fastener system
- 5-Year Warranty
- American Oak finish



From the Shorewood Collection in American Oak Finish



Model 5155
Mfg. No. 115155

SAUDER
woodworking

TV/VCR CART



- Swivel top accommodates most 27" TVs
- Spacious shelf for VCR
- Doors open with magnetic touch-latches
- Hidden casters
- Ready to assemble with Sauder concealed fastener system
- 5-Year Warranty
- American Oak finish



311

% of mkt: 20-25%
mkt share

9/22/98
closed mtg notes

- how do they feel their test is better
- want to improve UK procedures
 - performed variation test - see sheet

- get back to reality
- other models test analyses avoid - their methods
- introduce 100 models per yr. average - prototype tested by firm's method

CAP → This model + 2 others similar

Jack glides
 1/2 in molding
no casters (moved but cons. modified prod.) in design - diff. colours

~~no~~ retro active + prospective warranty card practice
 public notice - yes posters + P.N. per firm VNR?

- need verification of other models
 complying - has test/data; but uses their test methods - no incidents w/ these models - but they need to comply

To do

- we - we test CAP design - needs part need need to verify
- we - provide public notice options to firm done
- firm - verify comply other models
- they - list of currently active models
- firm - to submit outline of test procedures for our ok for other models
- we - p.n. + posters warranty cards (front w/ other manif's)

proposed
to test all active models also



MODEL 5155 TEST DATA

firm's
test data
9/22/98 closed mtd.

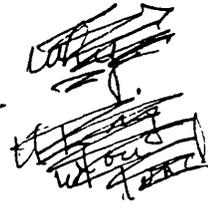
With Casters

UL, with test apparatus placed at front edge:

Unloaded: 5.1

Loaded: 7.9

only
w/ TV or test load
w/ TV, VCR + bottom load



UL, with test apparatus offset by 1 inch:

Unloaded: 6.7

Loaded: 9.2

TV, placed at front edge:

Unloaded: 6.9

Loaded: 9.6

TV, offset by 1 inch:

Unloaded: 8.3

Loaded: 10.6

With Tack Glides

plastic tabs ~~bottom~~ ^{bottom} on bottom
adds 1/4 in. to height
w/ out casters

UL, with test apparatus placed at front edge:

Unloaded: 9.0

Loaded: 11.9

UL, with test apparatus offset by 1 inch:

Unloaded: 10.2

Loaded: 13.3

TV, placed at front edge:

Unloaded: 10.3

Loaded: 14+

Conclusion:
use UL w/ out extra load
offset by 1 inch.
- # is an average
of several test
but is consistent
w/ no casters 31.7
w/ tack glides or
no tack glide

TV, offset by 1 inch:

Unloaded: 11.8

Loaded: 14+

With No Glides

+ no casters

UL, with test apparatus placed at front edge:

Unloaded: 9.3

Loaded: 12.4

UL, with test apparatus offset by 1 inch:

Unloaded: 10.6

Loaded: 13.6

TV, placed at front edge:

Unloaded: 10.9

Loaded: 13+

TV, offset by 1 inch:

Unloaded: 12.0

Loaded: 13+

*Per Frank - molding prevents sliding/tip
- uh sawp no molding*

2/14

Meeting - CPSC and Sauder
 9/22/98

<u>Name</u>	<u>Affiliation</u>	<u>Telephone Number</u>
Kori Saltzman	CPSC - Compliance	(301) 504-0608 x1203
Troy Whitfield	CPSC - Engineering	(301) 504-0494 x1318
Sharon White	CPSC - Human Factors	504-0583 Fax → (301) 504-2468 x1284
Jeffrey Smith	Sauder attorney	616 382-2300 x 3517
Kevin Sauder	Sauder - Exec. VP	419-446-2711
David Dietrich	Sauder - Test Lab	419-446-3762
Dennis Kargans	CPSC - CCD	(301) 504-0626 x131
Frank Vitaliti	CPSC - LSE	301-413-0178
Mark Gilbert	CPBL - LAB	301-413-0182
Judy Hayes	CPSC - CCH	301-504-0608 x1355

315

Sauder conf call 9/11/98

Agenda

Basis for staff's determination of SPH

- 1,189,000 units dist. 1989-present
- 15 incidents involving tip over
 - 4 incidents involving injury; 2 reports of fractured skulls; 2 reports re minor injuries;
 - 0 deaths
 - 10 incidents re moving the carts via the casters

three 6/98 1.5 million

HF's input re the potential to tip with the use of the casters

Firm's test protocol

- 3 methods of testing stability
 - simulated load
 - recommended load
 - unload
- Uses 10 degree plan
- Clarify firm's partial use of UL 1678

firm has not tested #5155 via UL 1678 to date; has only used its in-house test protocol - it passed see copy of report 5/24/98

Comparison of firm's test protocol with UL's protocol

- Use of simulated weight of bottom of cart may add more stability to the cart as opposed to simulating the worse case scenario, as instructed in UL 1678. UL 1678 allows you to add the additional weight, however, the extra weight is to create the worst case scenario, add stability. This may be the cause of discrepancy in the test results.

Firm's CAP Proposal

- Use of anti-skid pad since 6/97
- Use of non-swivel casters since 1993

why? if no problems

Current proposal in letter of 8/28/98

- Work with CPSC to explore ways to continue to improve stability of Sauder's models
- Involve other manuf.s in an industry wide study to develop new guidelines for design.
- Use new industry guidelines in all future product design.

CPSC's requested CAP

- Stop sales and distribution of current design of #5155
- Recall, replace or retrofit #5155
- Test all models using UL 1678
- Provide test results to staff
- Stop sales and dist. fo any models that do not comply with UL 1678 until design has been modified to meet UL 1678
- Issue joint press release

3/1

*Scheduling closed notg.
- det. to be 9/22 - time to be announced*

3/7

Sauder Conference Call 9/11/98

Agenda

- I. Basis for staff's determination of SPH - Judy
- II. HF's input re the potential to tip with the use of the casters - Sharon/Judy
- III. Firm's test protocol - firm and Troy
- IV. Comparison of firm's test protocol with UL's protocol firm, Troy
- V. Firm's CAP Proposal - firm and Judy
 - Use of anti-skid pad since 6/97
 - Use of non-swivel casters since 1993
 - Current proposal in letter of 8/28/98
 - Work with CPSC to explore ways to continue to improve stability of Sauder's models
 - Involve other manuf.s in an industry wide study to develop new guidelines for design.
 - Use new industry guidelines in all future product design.
- VI. CPSC's requested CAP firm and Judy
 - Stop sales and distribution of current design of #5155
 - Recall, replace or retrofit #5155
 - Test all models using UL 1678
 - Provide test results to staff
 - Stop sales and dist. fo any models that do not comply with UL 1678 until design has been modified to meet UL 1678
 - Issue joint press release
- VII. Firm's lack of cooperation to perform requested CAP
Judy, Dennis

2/1/98



Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502

419-446-2711

August 28, 1998

'98 SEP -3

Ms. Judith P. Hayes
Senior Compliance Officer
U.S. Consumer Product Safety Commission
Washington, D.C. 20207

RE: CPSC CA980039
Sauder Woodworking
Television Cart Model 5155

Dear Ms. Hayes:

Thank you for the extension you granted to provide a response to the CPSC's request for information about model 5155 and other TV carts you have been researching. Following our receipt of the CPSC's letter regarding this matter, we have begun a careful review of this matter. Although our review is continuing, the information currently available to us indicates that the CPSC's preliminary determination concerning the model 5155 television cart is erroneous.

As you may be aware, the model 5155 television cart was previously evaluated by the CPSC. On February 11, 1997, the CPSC's Office of Compliance -- Division of Corrective Actions (CPSC CA960103) notified us that it did not believe that any action under Section 15 of the CPSA was necessary with respect to the model 5155 cart. The design of the model 5155 cart has remained unchanged since that time.

The CPSC's recent action appears to relate to a general review of television carts and stands to determine their compliance with UL Standard 1678, which is a general "tip stability" test. Although UL 1678 is considered by Sauder Woodworking in its evaluation of products such as the model 5155 and similar products, we have also developed an internal "tip stability" testing protocol to test the overall safety of such products in a setting which more closely simulates actual conditions of use, utilizing "real life" loading conditions including televisions and VCR units. The model 5155 was subjected to this testing protocol, which it successfully passed.

Additionally, Sauder Woodworking closely monitors and reviews all incident reports received with respect to its products to ensure their safety. As previously reported to the CPSC, of the 2,645,679 carts comprising models 3304, 4451, and 5155 sold in the years 1986 through 1997, only 46 "incidents" were reported to us, i.e., only one complaint per 56,000 units. Moreover, several of these incidents consisted merely of warranty claims and similar non-safety matters. Thus, we believe that the history of the model 5155, and similar products, also demonstrates the overall safety of this design.

As noted in prior correspondence with the CPSC, model 3304 was discontinued from production in May 1997 due to declining sales. For the same reason, model 4551 is scheduled to be discontinued in the third quarter of 1998 with shipments ending during the first quarter of 1999. With sales of model 5155 also declining, and with newly designed products continually being introduced, we expect the market life on the model 5155 has also run its course.

Handwritten initials and a large number '9' are present in the bottom right corner of the page.

Ms. Judith P. Hayes
Page 2
August 28, 1998

Sauder Woodworking is continuing to evaluate our response to your inquiry, and we will update our response as appropriate, as additional information is obtained. However, based upon the information currently, as outlined above, we do not believe that the model 5155 presents a substantial product hazard as defined by section 15(a) of the CPSA.

As our product lines continue to evolve, Sauder Woodworking places a high priority on the overall safety of our products, and, if appropriate, we propose to work with CPSC staff to evaluate and increase the safety of all such products, including the following steps:

1. Jointly explore ways to continue to improve the stability of Sauder TV carts and stands.
2. Involve other manufacturers of similar products (Bush, O'Sullivan, Cosco, Mills Pride, etc.) in an industry wide study to develop new guidelines for design.
3. Use new industry guidelines in all future product design.

Likewise, if you believe that any additional information is required with respect to model 5155, we request a closed meeting with CPSC staff to review the available information and discuss any further steps that may be required to resolve your concerns.

Thank you for your consideration in this important matter. We look forward to hearing further from you.

Sincerely,

SAUDER WOODWORKING CO



Kevin J. Sauder
Executive Vice President

pm





Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502

Phone: 800-537-8560
419-446-2711

Fax: 419-446-4902

Fax Transmission

Date: August 28, 1998
To: Judith Hayes
Co. Name: U S Consumer Product Safety Commission

From: Kevin Sauder

Subject:

No. of Pages: 3
(including cover)

321



August 28, 1998

Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502

419-446-2711

Ms. Judith P. Hayes
Senior Compliance Officer
U.S. Consumer Product Safety Commission
Washington, D.C. 20207

RE: CPSC CA980039
Sauder Woodworking
Television Cart Model 5155

Dear Ms. Hayes:

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A handwritten signature in dark ink, appearing to be "M. J. Hayes", is located in the bottom right corner of the page.

Ms. Judith P. Hayes
Page 2
August 28, 1998

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As our product lines continue to evolve, Sauder Woodworking places a high priority on the overall safety of our products, and, if appropriate, we propose to work with CPSC staff to evaluate and increase the safety of all such products, including the following steps:

1. Jointly explore ways to continue to improve the stability of Sauder TV carts and stands.
2. Involve other manufacturers of similar products (Bush, O'Sullivan, Cosco, Mills Pride, etc.) in an industry wide study to develop new guidelines for design.
3. Use new industry guidelines in all future product design.

Likewise, if you believe that any additional information is required with respect to model 5155, we request a closed meeting with CPSC staff to review the available information and discuss any further steps that may be required to resolve your concerns.

Thank you for your consideration in this important matter. We look forward to hearing further from you.

Sincerely,

SAUDER WOODWORKING CO



Kevin J. Sauder
Executive Vice President

pm





Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502

419-446-2711

July 24, 1998

98 JUL 10

Ms. Judith P. Hayes
Senior Compliance Officer
U.S. Consumer Product Safety Commission
Washington DC 20207-0001

Dear Ms. Hayes:

Attached are the results of five tests performed by the Sauder Test Lab on our model #4551 TV Cart. Our senior testing engineer, Dave Dietrich, has consistently used three methods to determine whether our products meet the UL 10° unit stability guidelines. First, he simulates how a consumer would actually use the unit with an actual TV of recommended size, a VCR, and weight on the bottom shelf to simulate magazines and books. Next, he tests the unit using sand bags of the maximum weight recommended for each shelf. Finally, he tests the unit unloaded.

The five tests are summarized below:

<u>Test</u>	<u>Date</u>	<u>Result</u>	<u>Comments</u>
1	6/19/98	9.8°	simulated load
2	7/6/98	9.7°	simulated load
3	7/6/98	9.8°	simulated load
4	7/10/98	13.3°	simulated load with casters removed
5	7/10/98	13.3°	simulated load with casters removed

As you can see, the first three test results were extremely close to the UL guidelines of 10.0°, and the final two tests passed easily.

We believe the #4551 TV Cart should be of little safety concern to the CPSC for the following reasons:

1. As we have noted before, no injuries have been reported concerning this unit. This is rather compelling, since over 275,000 units have been sold within the last five years.
2. The UL tip test itself is a questionable measure of safety in this case. Unlike some furniture items with doors or drawers, the 4551 cannot easily be tipped from the front with downward pressure. (The sliding VCR shelf only extends 4.7 inches, and, when fully extended, requires in excess of 100 lbs. of pressure to tip the unit.)

Handwritten initials and scribbles

Ms. Judith P. Hayes

Page 2

July 24, 1998

This cart is most often used in family rooms or dens where the TV is stationary and the casters are merely a convenient way to swivel the unit around to a more pleasant viewing angle. We believe the UL tip test is more appropriate for true carts which are pushed around, and for units which may be tipped with pressure applied to front doors or drawers.

3. Because of its dated styling, the 4551 has been discontinued, and will no longer be manufactured or sold after December, 1998.

Thank you for your consideration in this matter.

Sincerely,

SAUDER WOODWORKING CO



Kevin J. Sauder
Executive Vice President

Attachments: test documents (3)

325

Product Testing Laboratory -- Unit Tests

UNIT STYLE: TV CART

MODEL # AND NAME 134551 TV Cart / General Furniture Unit "A"

	INSIDE	OUTSIDE
Relative Humidity %	53%	35%
Temperature: (°F)	82	86
(°C)	27.8	30.0

Test Manual
Revision Date: 11/03/97

Test Done: 6/19/98

Unit Weight(pounds): 52
Height (inches): 26.50
Depth (inches): 15.63

	WIDTH	DEPTH	THICKNESS	SQ. IN.
Top	26.50	14.50	16mm	384.250
Fixed Shelf	26.38	14.50	16mm	382.438
Bottom	26.50	14.50	16mm	384.250

Test Results

STABILITY

S-2.0 UNIT STABILITY

Test the unit unloaded, and loaded with appropriate simulated and recommended loading on each shelf.

Note: Adjustable horizontal surfaces loaded at mid range of adjustment for tests, unless otherwise noted.

Casters in most unstable position for the test.

	Simulated	Recommended	Used
Top	25" TV 70lb SHARP	85 lb	Used: 25" TV 70lb SHARP
Sliding Shelf	18 LB Emerson VCR	20 lb	Used: 18 LB Emerson VCR
Bottom	25 lb	40 lb	

Results

	Simulated	Recommended	Unloaded
Tip-over Angle°	9.8°	10.8°	+18.5°

Roller Shelf opens at: 9.1°

TEST DONE

Caution Label # to be applied: 226022. Wall bracket hardware not to be included.
Anti-skid pad, # 237758, to be included.

STRENGTH

L-1.0 APPURTENANCE LOADING

50 lbf. through a 2 in. dia. disc for 1 minute on Full open shelf. + 59.45lb

PASS

L-6.0 CASTER RETENTION

5 lb. in most severe direction = 1 minute.

PASS

L-8.0 RACK TEST

45° for 30 minutes left and right side:

PASS

SAFETY ISSUES

C-1.0 SHARP EDGE/ CORNER ANALYSIS

All representative edges and corners of finished unit checked with Set-50 sharp edge tester.

PASS

Note: All loads centered and distributed unless stated otherwise.

No reproduction of any part of this report is allowed without written permission of the Sauder Woodworking Product Testing Lab Manager/Product Safety Committee.

Copy to Kevin S.

326

Unit # 2
Date: 07/06/98

07/07/98

Product Testing Laboratory -- Unit Tests

UNIT STYLE: TV CART

MODEL # AND NAME 134551 TV Cart / General Furniture

	<u>INSIDE</u>	<u>OUTSIDE</u>	Test Manual
Relative Humidity %	63%	64%	Revision Date: 11/03/97
Temperature: (°F)	84	88	Test Done: 07/06/98
(°C)	28.9	31.1	

Unit Weight(pounds): 52 Height (inches): 26.50
 Depth (inches): 15.63

	<u>WIDTH</u>	<u>DEPTH</u>	<u>THICKNESS</u>	<u>SQ. IN.</u>
Top	26.50	14.50	16mm	384.250
Fixed Shelf	26.38	14.50	16mm	382.438
Bottom	26.50	14.50	16mm	384.250

Test Results

STABILITY

S-2.0 UNIT STABILITY

Test the unit unloaded, and loaded with appropriate simulated and recommended loading on each shelf
*Note: Adjustable horizontal surfaces loaded at mid range of adjustment for tests, unless otherwise not
 Casters in most unstable position for the test.*

	<u>Simulated</u>	<u>Recommended</u>	
Top	25" TV 70lb SHARP	85 lb	Used: 25" TV 70lb SHARP
Sliding Shelf	18 LB Emerson VCR	20 lb	Used: 18 LB Emerson VCR
Bottom	25 lb	40 lb	

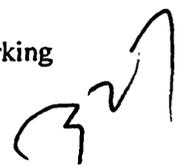
Results

	<u>Simulated</u> Unit		<u>Recommended</u> Unit		<u>Unloaded</u> Unit	
	A	B	A	B	A	B
Tip-over Angle°	9.7°	9.8°	10.9°	10.4°	+18.5°	+18.5°
Loaded Roller Shelf Opens at:	9.1°					

TEST DONE

Note: All loads centered and distributed unless stated otherwise.

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Copy To Kevin S. 

test # 4
test # 5
07/10/98

Product Testing Laboratory -- Unit Tests

UNIT STYLE: TV CART

MODEL # AND NAME 134551 TV Cart / General Furniture

	<u>INSIDE</u>	<u>OUTSIDE</u>	
Relative Humidity %	38%	37%	Test Manual
Temperature: (°F)	82	79	Revision Date: 11/03/97
(°C)	27.8	26.1	Test Done: 07/10/98

Unit Weight(pounds): 52 Height (inches): 26.50
Depth (inches): 15.63

	<u>WIDTH</u>	<u>DEPTH</u>	<u>THICKNESS</u>	<u>SQ. IN.</u>
Top	26.50	14.50	16mm	384.250
Fixed Shelf	26.38	14.50	16mm	382.438
Bottom	26.50	14.50	16mm	384.250

Test Results

STABILITY

S-2.0 UNIT STABILITY

Test the unit unloaded, and loaded with appropriate simulated and recommended loading on each shelf.
Note: Adjustable horizontal surfaces loaded at mid range of adjustment for tests, unless otherwise noted.
Casters provided for complete unit setup were removed for this test.

	<u>Simulated</u>	<u>Recommended</u>	
Top	25" TV 70lb SHARP	85 lb	Used: 25" TV 70lb SHARP
Sliding Shelf	18 LB Emerson VCR	20 lb	Used: 18 LB Emerson VCR
Bottom	25 lb	40 lb	

Results

	<u>Simulated</u>		<u>Recommended</u>		<u>Unloaded</u>	
	Unit		Unit		Unit	
	A	B	A	B	A	B
Tip-over Angle°	13.3°	13.3°	* 12.8°	** 14.4°	+18.5°	+18.5°
Loaded Roller Shelf Opens at:	9.1°		* TV Slides off without antiskid pad. ** TV tips off at 14.4°.			

TEST DONE

Note: All loads centered and distributed unless stated otherwise.

No reproduction of any part of this report is allowed without written permission of the Sauder Woodworking Product Testing Lab Manager/Product Safety Committee.

Handwritten signature/initials

*done B 1/98
H 1/98
to v. v. v.
for 1/98*

Sauder	Model	Model style	Dist dates	# dist.	Incidents	Indep. tips	Weight tip	Dtts/Inj	Frm tst UL	Frm tst tip	FrmCsd rUL	SmpleColl	SmpleTest	Fail ES	Pass ES	Casters	Tip warning
	5155	cart	89-pres	1,189,518	15	10	4	0/4	yes, only those models intro. after '96	yes	yes, for those models intro. prior to '96	yes	yes	yes, 1/98	no	yes	<i>yes</i>
	4551	cart	86-98	294,636	0	0 ?	0 ?	0		pending		yes	yes	yes, 1/98	no	yes	
	145	cart	91-pres	1,406,495	1	?	?	0		no		no	no	n/a	n/a	?	
	2351	cart	91-98	74,133	3	3	0	0		no		no	no	n/a	n/a	?	
	2352	cart	91-98	9,524	3	2	1	0		no		no	no	n/a	n/a	?	
	2651	cart	91-pres	110,197	1	0	1	0		no		no	no	n/a	n/a	?	
	2655	cart	91-pres	123,735	1	0	1	0		no		no	no	n/a	n/a	?	
	2667	ent.cnt	91-98	54,797	2	1	1	0/1		no		no	no	n/a	n/a	?	
	2948	cart	91-pres	88,834	1	0	1	0/1		no		no	no	n/a	n/a	?	
	2951	cart	91-pres	205,905	4	1	3	0		no		no	no	n/a	n/a	?	
	2953	cart	91-98	65,341	1	0	1	0/1		no		no	no	n/a	n/a	?	
	3355	cart	91-pres	256,185	6	4	2	0/2		no		no	no	n/a	n/a	?	
	5055	cart	91-pres	390,728	1	0	1	0/1		no		no	no	n/a	n/a	?	

*19 models to date are no longer produced
of which 11 are
10
of which 11 are
1/1/98*

525

033

	6251	7955	8265	8648	8655	8674
	41,683	125,369	4,836	117,442	196,277	9,374
ent. cnt	91-98	91-98	91-98	91-98	91-98	91-98
cart	91-98	91-98	91-98	91-98	91-98	91-98
no	1	1	1	5	1	1
no	1	1	0	1	0	1
no	0	0	1	4	1	0
no	0	0	0	0/2	0/1	0
no	no	no	no	no	no	no
no	no	no	no	no	no	no
no	no	no	no	no	no	no
n/a	n/a	n/a	n/a	n/a	n/a	n/a
n/a	n/a	n/a	n/a	n/a	n/a	n/a
?	yes	?	?	?	?	?

A	A	B	C	D	E	F	G	H	J
1	Firm/models	Incid	failed ES	coll.smple	smple tested	dths/inj	indep.tips	weight tips	Comments
2	Sauder								
3	#5155	15	yes, 1/98	yes	yes	0/4	10	4	ES compare results
4	#4551	0	yes, 1/98	yes	yes	0/0	0	0	ES compare results
5	23 models	38	not tested	no	no	0/5	25	13	
6									casters & pads test
7	Bush								
8	#7414	0	yes, 1/98	yes	yes	0/0			
9	#5414	2	not tested	pending	pending	0/2	2	0	
10	#7920	1	not tested	pending	pending	0/1	0	0	
11									
12	Thornwood								
13	#TVC	1	not tested	pending	pending	1/0	0	1	
14									
15	New Direct								
16	#E-5872	1	not tested	pending	pending	1/0	0	1	review analyses
17									
18	Vargas								
19	#MA-EC-100	1	not tested	pending	pending	0/0	0	0	caster broke
20									
21	So. Woods								
22	#30192	0	yes, 1/98	yes	yes	0/0	0	0	
23									
24	Ameriwood								
25	#8417	1	not tested	pending	pending	0/0	1	0	IDI, cart
26									
27	Charleswood								
28	#56439	1	not tested	yes	pending	1/0	1	0	IDI, ent center
29									
30	Nat. Woodcraft								
31	#3501	1	not tested	pending <i>yes</i>	pending	1/0	0	1	IDI, ent. center
32	1864			<i>yes</i>					

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Is your RETURN ADDRESS on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

Maynard Sauder
 President
 Sauder Woodworking
 502 Middle Street
 P.O. Box 156
 Archbold, OH 435020156

I also wish to receive the following services (for an extra fee):

1. Addressee's Address
 2. Restricted Delivery
- to postmaster for fee.

320 452 542

- Certified
- Insured
- Merchandise COD

8-10 980

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)

X Will Peterson

Thank you for using Return Receipt Service.

332



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207

OFFICE OF COMPLIANCE
Recalls and Compliance Division

Judith P. Hayes
Senior Compliance Officer
Tel: 301-504-0608, Ext. 1355
Fax: 301-504-0359

JUL 3 0 1998

Certified Mail

Maynard Sauder
President
Sauder Woodworking
502 Middle Street
Archbold, OH 43502

Re: CPSC CA980039
Sauder Woodworking
Television Cart Model 5155

Dear Mr. Sauder:

The staff of the Office of Compliance of the U.S. Consumer Product Safety Commission (Commission) has reviewed the available information concerning the above-mentioned case.

After careful consideration and in accordance with 16 C.F.R. § 1115.12(a), the Compliance staff has made a preliminary determination that the model 5155 television cart presents a substantial product hazard as defined by section 15(a) of the Consumer Product Safety Act (CPSA), 15 U.S.C. § 2064(a). Specifically, the television cart has the potential to tip over in such a manner that it does not comply with the industry's voluntary standard "Tip Stability Test", UL 1678, Household, Commercial, and Professional-Use Carts and Stands.

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The staff welcomes and will give full consideration to any comments or additional information from the firm concerning its preliminary determination. The staff will meet with the firm as necessary to discuss its comments or corrective action.

Voluntary Corrective Actions

The staff requests that the firm take voluntary action to notify consumers and to recall or correct potentially hazardous products which are in the chain of distribution and in the possession of consumers. If the firm agrees to take voluntary corrective action, please submit a written corrective action plan describing the actions which it plans to take. Section 1115.20(a) of the regulations on Substantial Product Hazard Reports, 16 C.F.R. § 1115.20(a), outlines the elements of an appropriate corrective action plan. The staff has also enclosed examples of recall actions taken by firms that the firm may find useful. The staff will review the firm's plan promptly and discuss with it any suggestions it has or additional measures it believes Sauder Woodworking should take.

In this case, the staff recommends that Sauder Woodworking discontinue distribution and sales of its model 5155 television stand until the design of the subject model is in compliance with the voluntary industry standard UL 1678. This recommendation also applies to all models of television carts, stands and entertainment centers manufactured and distributed by Sauder Woodworking Co. that do not comply with the subject standard. Specifically, it is recommended that Sauder perform the "Tip Stability Test", UL 1678 on all its models television carts, stands and entertainment centers, submit the tests results and analyses to our staff's attention for review, and modify the design of the models that fail the subject tip stability test to comply with the standard.

Please provide the Office of Compliance with a written corrective action plan describing the actions which the firm is taking and plans to take. This written plan should contain the elements listed in 16 C.F.R. § 1115.20(a).]

Additionally, rather than the Commission unilaterally issuing a press release, the staff believes it would be appropriate for the firm and the Commission to issue a joint press release announcing the corrective action program to be implemented by Sauder Woodworking Co. The staff will work with the firm to develop and issue a mutually acceptable release.

A voluntary corrective action plan must include an agreement that the Commission may publicize the terms of the plan and inform the public of the nature and the extent of the alleged substantial product hazard. Please read carefully the enclosed document on "Information Disclosure" dated May 12, 1983. This document discusses the statutes and regulations which govern the Commission's disclosure of information and explains Commission

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staff's policy on the disclosure of information concerning product recalls and similar actions.

When the corrective action program begins, the Office of Compliance will monitor the progress of the corrective action. The staff requests that the firm provide monthly progress reports to the Office of Compliance (using the enclosed form). Please provide customer lists and any other information requested so that the staff can monitor the effectiveness of the corrective action at various levels of the distribution chain.

Compliance With Reporting Obligations

Once agreement is reached on a corrective action plan and the plan is implemented, if appropriate, the staff will also investigate and assess whether it believes the firm has complied with the reporting requirements of Section 15(b) of the CPSA, 15 U.S.C. § 2064(b). That section requires every manufacturer, distributor, and retailer of a consumer product who obtains information which reasonably supports the conclusion that the product (1) contains a defect which could create a substantial product hazard, or (2) creates an unreasonable risk of serious injury or death, immediately to inform the Commission of the defect, or risk, unless the firm has actual knowledge that the Commission has been adequately informed of the defect, or the risk. See 16 C.F.R. Part 1115. The CPSA makes it a prohibited act to violate the reporting requirement. Firms may be liable for a civil penalty of \$6000 for each product involved up to a maximum of \$1,500,000 for any related series of violations. Sections 15(b), 19(a)(4), 20 and 21 of the CPSA, as amended, 15 U.S.C. § 2064(b), § 2068(a)(4), § 2069 and 2070, describes the obligation of manufacturers, distributors and retailers to furnish information to the Commission and the penalties for failing to furnish such information.

If the firm receives any information concerning other incidents or injuries, or information affecting the scope, prevalence or seriousness of the defect or hazard, it must report that information to this Office immediately. Additionally, if the firm receives information which might indicate that its corrective actions are not satisfactory in eliminating the defect or hazard or that the effectiveness of the corrective action program is less than what has been reported, it must report that information to this Office immediately.

The staff requests a response within 10 working days from receipt of this letter.
Please reference the CPSC file number in your response.

The staff will make every effort to work closely and cooperatively with the firm to assure a successful corrective action plan which will protect the public while at the same time create a minimum of burden and inconvenience for the firm. If you have any questions or desire assistance in responding to this letter, you may contact Judith Hayes, at: (301) 504-0608, extension 1355. To respond to this letter using the U.S. Postal Service, please address

Handwritten signature and initials in the bottom right corner of the page.

Page 4
CA980039

your correspondence to: Office of Compliance, U.S. Consumer Product Safety Commission, Washington, D.C. 20207-0001. For other delivery services, please address the material to: Office of Compliance, U.S. Consumer Product Safety Commission, Room 613, 4330 East West Highway, Bethesda, MD 20814-4408. The Office of Compliance telefax number is (301) 504-0359.

Sincerely,

Judith Hayes
Senior Compliance Officer
Recalls and Compliance Division

Enclosed are

Progress Report Form
Information Disclosure Sheet
Examples of Notification Measures

cc: Consumer Product Safety Commission
Central Regional Center
Suite 2945
230 S. Dearborn St.
Chicago, IL 60604

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U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

RECALLS AND COMPLIANCE DIVISION

TEL: 301-504-0608

FAX: 301-504-0359

DATE: 6/17/98 PAGES TRANSMITTED 1 + cover

TO: Kevin Sanders

TITLE: _____

OFFICE: _____

FAX #: (419) 446-3690

FROM: Justin Hayes

REMARKS: _____

Confirmation copy to follow by U.S. Mail

Fax Transmission Only

NOTE: If all pages are not received, or if you have problems with this transmittal, please contact the person listed above.

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U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207-0001

OFFICE OF COMPLIANCE
Recalls and Compliance Division

Judith P. Hayes
Senior Compliance Officer
Tel: 301-504-0608, ext. 1355
Fax: 301-504-0359

June 17, 1998

VIA FAX (419) 446-3690

Kevin J. Sauder
Executive Vice President
Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502

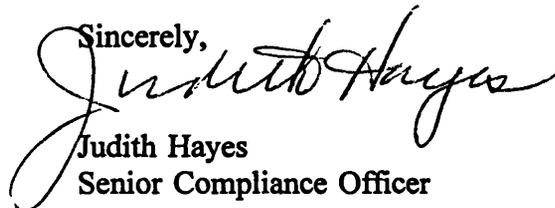
Re: CPSC CA980039
Sauder Woodworking Co.
Television Carts, Stands and Entertainment Centers

Dear Mr. Sauder:

Thank you for your response of May 21, 1998. In your correspondence, it is noted that at the time that letter was written, Sauder had not performed the UL tip test on the model # 4551 television cart. Please inform us whether the UL tip test, or any other tip test, has been performed to date, and if so, please submit copies of all the pertinent test analyses, procedures and conclusions.

Thank you once again for your cooperation. A response to this request by Monday, June 22, 1998 would be appreciated.

Sincerely,


Judith Hayes
Senior Compliance Officer

338



Fax: 419-446-3690

Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502

419-446-2711

May 21, 1998

Ms. Judith Hayes
Office of Compliance
U.S. Consumer Product Safety Commission
Room 613
4330 East West Highway
Bethesda, MD 20814-4408

86.

MAY 20 1998

Dear Ms. Hayes,

Enclosed is the information requested in your letter dated May 12, 1998. Sauder Woodworking responded to the requests to the best of our knowledge and understanding.

The requested samples of non-swivel casters and anti-skid pads are sent separately.

If any of the information is unclear, please do not hesitate to contact me.

Sincerely,
SAUDER WOODWORKING CO.

Kevin Sauder
Executive Vice President

MODE = MEMORY TRANSMISSION

START=MAY-13 16:51

END=MAY-13 16:52

FILE NO. = 050

STN NO.	COM	ABBR NO.	STATION NAME/TEL.NO.	PAGES	DURATION
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-CPSC COMPLIANCE -

***** -301 504 0359 - ***** - 301 504 0359- *****



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

RECALLS AND COMPLIANCE DIVISION

TEL: 301-504-0608

FAX: 301-504-0359

DATE: 5/13/98 PAGES TRANSMITTED 2 + cover

TO: Kevin Snider

TITLE: _____

OFFICE: _____

FAX #: (419) 446-3690

FROM: Judith Hayes

REMARKS: Snider Woodworking

- Confirmation copy to follow by U.S. Mail
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U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

RECALLS AND COMPLIANCE DIVISION

TEL: 301-504-0608

FAX: 301-504-0359

DATE: 5/13/98 PAGES TRANSMITTED 2 + cover

TO: Kevin Snider

TITLE: _____

OFFICE: _____

FAX #: (419) 446-3696

FROM: Janith Hayes

REMARKS: Snider Woodworking

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Handwritten initials/signature



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207-0001

OFFICE OF COMPLIANCE
Recalls and Compliance Division

Judith P. Hayes
Senior Compliance Officer
Tel: 301-504-0608, ext. 1355
Fax: 301-504-0359

May 12, 1998

Via Fax (419) 446-3690

Kevin J. Sauder
Executive Vice President
Sauder Woodworking Co.
502 Middle Street
Archibold, OH 43502

Re: CPSC CA980039
Sauder Woodworking Co.
Television Carts, Stands and Entertainment Centers

Dear Mr. Sauder:

Pursuant to our telephone conversation of May 8, 1998, please disregard our staff's request dated May 6, 1998. In place of the May 6 request, we ask that your firm respond to the following:

1. Copies of all tip-over incidents, since 1991, pertaining to all models of Sauder's television carts, stands and entertainment centers. Please notate the subject models to which the respective incidents apply.
2. The total number of units of each model cart, stand, and entertainment center manufactured by Sauder since 1991.
3. The period of time Sauder has used the UL tip test in its test procedures.
4. The actual UL tip test data and/or test analysis pertaining to the model 5155 television cart.
5. Is the UL tip test applied to all Sauder models of carts, stands and entertainment

JPH

centers? If not, please provide an explanation as to why it is not applied to each cart, stand and entertainment center and a list of models to which the UL tip test is applied.

7. Are the anti-skid pads and the non-swivel casters used on every model cart, stand and entertainment center? If not, please explain the criteria for application of the anti-skid pad and the non-swivel casters.

8. Please provide three samples of the anti-skid pads and two samples of each size of non-swivel caster. If there is a cost involved in this request for samples, please inform us in advance to sending the samples. The samples should be delivered to my attention, Office of Compliance, U.S. Consumer Product Safety Commission, Room 613, 4330 East West Highway, Bethesda, MD 20814-4408.

Please submit a response to the above requests within ten working days of receipt of this correspondence. Thank you again for your cooperation in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Judith Hayes". The signature is written in black ink and is positioned to the right of the typed name.

Judith Hayes

A small, handwritten mark or signature in the bottom right corner of the page, consisting of several loops and lines, possibly initials.



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

RECALLS AND COMPLIANCE DIVISION

TEL: 301-504-0608

FAX: 301-504-0359

DATE: 5/5/98 PAGES TRANSMITTED 9 + cover

TO: Kevin J. Sauder

TITLE: _____

OFFICE: Sauder Woodworking Co.

FAX #: 419-446-3690

FROM: Judith Hayes

REMARKS: TV carts, stands and
entertainment centers

Confirmation copy to follow by U.S. Mail

Fax Transmission Only

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U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207-0001

OFFICE OF COMPLIANCE
Recalls and Compliance Division

Judith P. Hayes
Senior Compliance Officer
Tel: 301-504-0608, ext. 1355
Fax: 301-504-0359

May 6, 1998

Via Fax (419) 446-3690

Kevin J. Sauder
Executive Vice President
Sauder Woodworking Co.
502 Middle Street
Archibold, OH 43502

Re: CPSC CA980039
Sauder Woodworking Co.
Television Carts, Stands and Entertainment Centers

Dear Mr. Sauder:

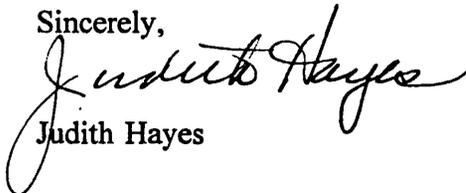
Thank you for your correspondence of April 1, 1998, in response to our inquiry concerning the risk of injury associated with the instability of television carts, stands and entertainment centers. Your cooperation in this matter is greatly appreciated.

However, your response only addressed the models 3304 Utility Cart, 4451 TV/VCR Cart and 5155 TV/VCR Cart. As requested in our original letter of March 10, 1998, we ask that you submit the specified information pertaining to all model television carts and stands manufactured, imported and distributed by Sauder Woodworking Co. We also request that your next submission include the specified information as it pertains to all models of entertainment centers manufactured, imported and distributed by Sauder. A copy of our March 10, 1998, letter is attached for your reference.

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A response within ten working days of your receipt of this letter is requested. Please do not hesitate to contact me with any concerns that may involve this request. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Judith Hayes". The signature is written in black ink and is positioned above the printed name.

Judith Hayes

Enclosure

376



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U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207

OFFICE OF COMPLIANCE
Recalls and Compliance Division
Email: lsaltzman@cpsc.gov

Lori E. Saltzman
Associate Director
Tel: 301-504-0608, Ext. 1203
Fax: 301-501-0359

MAR 10 1998

Certified Mail

Maynard Sauder
President
Sauder Woodworking
502 Middle Street
P.O. Box 156
Archbold, OH 43502-0156

Re: CPSC CA980039
Sauder Woodworking
Television Carts and Stands

Dear Mr. Sauder:

The U.S. Consumer Product Safety Commission (CPSC) is an independent federal regulatory agency established by Congress in the Consumer Product Safety Act, 15 U.S.C. § 2051-2084. The Commission is responsible for protecting the public from unreasonable risks of injury associated with consumer products.

The Commission's staff is currently investigating the risk of injury associated with the instability of television carts and stands. Epidemiological data collected from the Commission's clearinghouse reflect an industry-wide pattern of carts and stands having the potential to tip over causing a television placed on top to fall forward. This tip over action can result in death or severe injury to someone in close proximity to the television at the time it falls from the cart or stand.

Our technical staff evaluated the stability of television carts and stands for compliance with the "Tip Stability Test" in Underwriters Laboratories (UL) Standard 1678, Household, Commercial and Professional-Use Carts and Stands, which covers carts and stands intended for use with audio and video products. Various brands of sample carts and stands were

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selected for testing from a survey of manufacturers. Included in the samples were Sauder Woodworking TV cart model numbers 4551 and 5155 and utility stand model number 3304. Our staff's test results reflect that the TV cart model numbers 4551 and 5155 and utility stand model number 3304 fail to comply with the requirements of the "Tip Stability Test". Consequently, we are pursuing an investigation of your firm's television carts and stands to determine the scope of the potential safety hazard that may be involved.

Enclosed for your information are the Consumer Product Safety Act and the Commission's regulation, "Substantial Product Hazard Reports," 16 C.F.R. Part 1115. These documents explain the Commission's authority and policy regarding products that may present substantial product hazards and also explain the firm's rights and obligations under the Act.

One of the responsibilities of the Compliance staff is to determine preliminarily whether a defect is present in a product and, if so, whether that defect rises to the level of a substantial product hazard as defined by section 15(a) of the Consumer Product Safety Act (CPSA), 15 U.S.C. § 2064(a).

Information Requested

For the staff to assess accurately the potential safety hazard, if any, associated with the subject product, it needs certain information from the manufacturer or importer. While the staff recognizes that your firm is not filing a report pursuant to Section 15(b) regarding a possible defect with this product, the type of information requested for a full report is generally the information needed by the staff. **Please follow 16 C.F.R. § 1115.13(d) (1-14) and provide the specified information, to the extent applicable to the product and problem described above. In your response, please reference each question number (1-14).**

In addition to providing the information requested above, please also submit the following information:

- 15(a) Regarding question 6, include **copies** of all consumer or dealer complaints, warranty claims, and reports of injury related to each model television cart and stand manufactured, imported and/or distributed by your firm. Include copies of all court complaints and related documents for lawsuits involving the products and the resolution of those lawsuits.

If copies of consumer complaints and other documents requested above are unavailable, indicate the reason they are unavailable and provide a summary containing the names, addresses and telephone numbers of the consumers or of the plaintiffs' attorneys.

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- 15(b) Copies of all test reports, analyses, evaluations, and premarket tests related to the tip over problem for each model TV cart and stand manufactured, imported and/or distributed by your firm. Also, include copies of all UL certifications relative to the UL 1678, "Tip Stability Test" for each model TV cart and stand.
- 15(c) Copies of all engineering drawings, engineering change notices and material specifications related to the subject problem for each model TV cart and stand manufactured, imported and/or distributed by your firm.
- 15(d) Copies of all literature provided to consumers concerning the recommended and/or restrictive use of television size and weight for each model TV cart and stand manufactured, imported and/or distributed by your firm.
- 15(e) Individually specify whether casters are to be used with all model TV carts and stands manufactured, imported and/or distributed by your firm. Specifically list whether: (1) casters are to remain installed on the cart/stand; (2) provided for transporting to be removed once cart/stand is stabilized; or (3) not provided with cart/stand.
- 15(f) Provide catalogs or photos of all model TV carts and stands manufactured, imported and/or distributed by your firm. Include all warning labels/stickers and assembly instructions for each model TV cart and stand.
- 15(g) Provide UPC codes for all models involved.

Information Disclosure

Section 6(b)(5) of the CPSA, 15 U.S.C. § 2055(b)(5), prohibits the release of information submitted under section 15(b) of the CPSA unless a remedial action plan has been accepted in writing, a complaint has been issued, or a firm consents to such release.

If the firm submits any information that it considers to be a trade secret, or confidential commercial or financial information, it must mark it "confidential" in accordance with section 6(a)(3) of the CPSA, as amended, 15 U.S.C. § 2055(a)(3). The Commission may not disclose to the public trade secret information or proprietary commercial or financial data. If the firm does not request confidential treatment at the time of its submission, or within ten

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