

From: [Wickersham, Jr., Richard](#)
To: [Super, Korinne](#)
Subject: RE: CPSC FOIA Request #23-F-00592 - Clarification Needed
Date: Thursday, September 28, 2023 8:28:10 PM

Morning Korinne!

I would expect with a January 2019 Canadian Recall, a proper time period would be **2017 to date**?

Thanks in advance for your assistance with our investigation of this product which caused a serious injury. Much appreciated.

Bruce

[Richard B. Wickersham, Jr.](#)
Principal
Post & Schell, P.C.

Four Penn Center, 13th Floor
1600 John F. Kennedy Blvd.
Philadelphia, PA 19103

215-587-6612 (Phone)

215-901-0766 (Cell)

215-320-4875 (Fax)

rwickersham@postschell.com

www.postschell.com

[Download My Contact Information](#)

From: Super, Korinne <KSuper@cpsc.gov>
Sent: Tuesday, September 26, 2023 3:02 PM
To: Wickersham, Jr., Richard <RWickershamJr@PostSchell.com>
Subject: CPSC FOIA Request #23-F-00592 - Clarification Needed

ALERT: This message originated outside of Post & Schell's network. BE CAUTIOUS before clicking any link or attachment.

Dear Mr. Wickersham,

We received your FOIA request for, *inter alia*, "information and documentation related to the Government of Canada, Recall No. RA-68862."

Please advise a search timeframe for the Canadian recall records. Once received, we will conduct our search and process your request.

Thank you,
Korinne

Korinne I.B. Super
Attorney Advisor, Division of Information Access



RECEIVED

SEP 15 2023

by GCIA

Four Penn Center
1600 John F. Kennedy Blvd.
Philadelphia, PA 19103
215-587-1000 Main
215-587-1444 Fax
www.postschell.com

Richard B. Wickersham, Jr.
rwickersham@postschell.com
215-587-6612 Direct
215-320-4875 Fax
File #: 195795

September 11, 2023

U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814

Certified Mail - Return Receipt Requested

Re: **FOIA Request (Recall No. 19-069)**

Dear Sir or Madame:

Pursuant to the provisions of the Freedom of Information Act, 5 U.S.C. §552, and implementing departmental regulations, 29 C.F.R. §2201 *et. seq.*, I am submitting a request for copies of the following records and media:

1. All information and documentation related to Consumer Product Safety Commission **Recall No. 19-069**;
2. All communications (via paper or electronically stored information) with **distributor SRAM LLC** related to defective SRAM® i-Motion 3 three-speed internal gear hubs with a coaster brake installed on bicycles with no redundant braking system;
3. All communications (via paper or electronically stored information) with **manufacturer Heng Ying Machinery Co., Ltd.** of Taoyuan City, Taiwan related to defective SRAM® i-Motion 3 three-speed internal gear hubs with a coaster brake installed on bicycles with no redundant braking system;
4. All consumer complaints related to defective SRAM® i-Motion 3 three-speed internal gear hubs with a coaster brake installed on bicycles with no redundant braking system;
5. All consumer accident/incidents related to defective SRAM® i-Motion 3 three-speed internal gear hubs with a coaster brake installed on bicycles with no redundant braking system;
6. All consumer injury reports related to defective SRAM® i-Motion 3 three-speed internal gear hubs with a coaster brake installed on bicycles with no redundant braking system; and,

U.S. Consumer Product Safety Commission
September 11, 2023
Page 2


7. All information and documentation related to the Government of Canada, Recall No. RA-68862.

If any fees are to be incurred and assessed to me in the process of searching for information and filing this request, or copying any information/photos/video to a CD or thumb-drive, please supply the records and media without contacting me first as long as the fees do not exceed \$250.00.

If all or any part of this request is denied, please cite specific exceptions that you feel justify your refusal to release this information. If any records or media cannot be located, please advise me as to what search efforts were made in connection with this request. If another agency is the custodian of these records or media, please advise me of the name and address of that agency.

Thank you for your timely consideration to my request. Should you have any questions, I can be reached at the phone number (or e-mail address) noted above at your convenience.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Richard B. Wickersham, Jr.", with a stylized flourish at the end.

Richard B. Wickersham, Jr.

RBW/ick



United States
Consumer Product Safety Commission

December 21, 2023

Via Email & Public Access Link (PAL)

Richard B. Wickersham, Jr.
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Blvd.
Philadelphia, PA 19103-2808
rwickersham@postschell.com

RE: Freedom of Information Act Request #23-F-00592: All information and documentation related to CPSC Recall 19-069 and the Government of Canada Recall No. RA-68862. [See attached Request Description]

Dear Mr. Wickersham:

Thank you for your Freedom of Information Act (FOIA) request seeking information from the U.S. Consumer Product Safety Commission (CPSC). Enclosed please find a copy of the records responsive to your request, which are contained in CPSC recall file RP190048, with certain excisions explained below.

The enclosed records include file information generated by CPSC, or its contractors, for regulatory or enforcement purposes. These records are in the above-stated CPSC recall file. CPSC has established management systems under which supervisors are responsible for reviewing the work of their employees or contractors. The file information materials are final and have been prepared and accepted by CPSC staff under such review systems. CPSC believes that it has taken reasonable steps to ensure the accuracy of the information.

Any records responsive to your request for "[a]ll information and documentation related to the Government of Canada, Recall No. RA-68862" are maintained in the above-stated CPSC recall file.

Portions of RP190048 are being withheld pursuant to FOIA Exemptions 3, 4, and 5, 5 U.S.C. §§ 552(b)(3), (b)(4), and (b)(5), and sections 6(a)(2) and 6(b)(1) of the Consumer Product Safety Act (CPSA), 15 U.S.C. §§ 2055(a)(2) and (b)(1). Additionally, portions of RP190048 are related to recalls that are not the subject of FOIA request #23-F-00592 and are not being released on that basis. CPSC considered the foreseeable harm standard when reviewing these records and applying FOIA exemptions.

Exemption 3. FOIA Exemption 3 permits withholding from disclosure matters that are specifically exempted from disclosure by another statute. In applying FOIA Exemption 3 to these records, we are relying in part on section on Consumer Product Safety Act (CPSA) section 6(a)(2) to withhold files that contain proprietary and confidential information, and CPSA section 6(b)(1).

Exemption 4. CPSA Section 6(a)(2) prohibits the CPSC from disclosing information that is exempt from disclosure under Exemption 4 of the FOIA. That exemption protects trade secrets and confidential commercial information directly related to a firm's business that the firm has not made public and whose disclosure could give a substantial commercial advantage to a competitor. We are withholding the following pages in full under FOIA Exemptions 3 and 4, and CPSA section 6(a)(2), which contain confidential commercial information submitted by the manufacturer, including information submitted in the manufacturer's CPSA section 15 report, and product and testing information: 1-4 (Initial Report); 11-19 (Full Report); 27 (product data); 29-30, 251-252 (supplement to Full Report); 55-60 (customer support information); and 255-263 (documents submitted with Full Report). A spreadsheet comprising a retailer list is also withheld in full under FOIA Exemptions 3 and 4, and CPSA section 6(a)(2).

Similarly, we are withholding in part, the following pages of RP190048 that contain confidential commercial or business information: 5, 33-34, 45, 47, 49-50, 52, 280-286, 288-289, 291, 293-295, and 297-301.

In applying FOIA Exemption 3, we are also relying on CPSC's regulations at 16 C.F.R. § 1101.33(b) and section 6(b)(1) of the CPSA, which require that CPSC will not disclose information when it would not be fair in the circumstances. It would not be fair in the circumstances to disclose a firm's notes, drafts, discussions, and information submitted to the CPSC to negotiate a press release and corrective action plan when the company has requested confidentiality and such records are protected from disclosure pursuant to 16 C.F.R. § 1101.33(b). We are withholding the file materials that would reveal draft materials, settlement negotiations, and discussions concerning the negotiation of the press release and corrective action plan from the following pages of RP190048 in their entirety:

- A. 53-54, 61-64, 83, 87-91, 100, 106, 107-109, 120-123, 125, 137-138, 143-145, 158, 164-165, 169-170, 184-185, 197, 204, 208-209, 214-216, 222-223, 248-250, 264-266, 268, 276, 279 (correspondence between the firm and CPSC regarding recall negotiations); and
- B. 139-142, 159-161, 166-168, 171-173, 186-188, 205-207, 210-212, 224-226 (draft recall announcements).

Similarly, we are withholding in part, the following pages of RP190048 that contain such information: 28, 33-34, 48, 105, 110-112, 115, 163, 213, 272, 275, and 278.

Exemption 5. FOIA Exemption 5 permits withholding from disclosure inter-agency and intra-agency memoranda which would not be available by law to a party other than an agency in litigation with the agency. The staff memoranda and analyses being withheld are pre-decisional and deliberative, consisting of recommendations, opinions, suggestions, and analyses of technical and/or legal staff. Any factual materials in the memoranda not covered by some other exemption are inextricably intertwined with exempt materials, or the disclosure of the factual materials would expose the deliberative process and/or violate the attorney-client privilege. It would not be in the public interest to disclose these materials because disclosure would impair the frank exchange of views necessary for such matters.

Accordingly, we are withholding in full under Exemption 5, the following pages of RP190048, which contain pre-decisional draft documents and staff deliberations: 31-32, 72-73, 74-82, 97-99, 117, 134-136, 149-152, 155-157, 176-178, 181-183, 190-192, 194-196, 219-221, and 302-303.

Fees. Enclosed is a final invoice detailing the fees charged for FOIA request #23-F-00592. CPSC's FOIA regulations at 16 C.F.R. § 1015.9 permit charging fees for processing FOIA requests.

Please make a payment of the total amount due, \$129.00. Payments can be submitted directly from a bank account or by credit/debit card using Pay.gov. The Pay.gov website allows remitters to make secure payments electronically. It is an easy and convenient system that is available 7 days a week - 24 hours a day. The following link directs you to the pay.gov website: <https://pay.gov>. You may also pay via U.S. mail. If paying by mail, checks or money orders should be made payable to the U.S. Department of Treasury and mailed to: MMAC/FAA/DOT/CPSC, HQ RM I 81/AMK- 326, 6500 S. Macarthur Boulevard, Oklahoma City, OK 73169.

Note: After thirty days interest will be charged on amounts billed. Furthermore, if billing is not paid in a timely manner the CPSC will require advance payment for your future requests and any pending requests.

FOIA Administrative Procedures

Right to Appeal. According to the CPSC's regulations implementing the FOIA at 16 C.F.R. § 1015.7, a partial denial of access to records may be appealed. Also, a fee determination may be appealed pursuant to the CPSC's regulations at 16 C.F.R. § 1015.9(f)(6). You may administratively appeal in writing, addressed to FOIA APPEAL, Office of the General Counsel, ATTN: Division of Information Access, U.S. Consumer Product Safety Commission, 4330 East West Highway, Room 820, Bethesda, MD 20814-4408.

Your appeal must be postmarked or electronically transmitted (cpscfoiarequests@cpsc.gov) within 90 days of the date of the response to your request. You may also fax your appeal to 301-504-0127. You may contact us Monday – Friday from 8:00AM – 4:30PM ET, by telephone at 1-800-638-2772, by fax to 301-504-0127, or by email addressed to cpsc-foia@cpsc.gov.

Before filing a formal appeal with the CPSC, you may contact me or CPSC's Senior FOIA Public Liaison, Robert Dalton (rdalton@cpsc.gov), at 1-800-638-2772, for any further assistance, or to discuss any aspect of your request. Assistance may include guidance on possible reformulation of your request or an alternative time frame for processing the request.

Right to Mediation. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001; email at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or fax to 202-741-5769.

Sincerely,

Korinne Super  Digitally signed by Korinne
Super
Date: 2023.12.21 09:35:05 -05'00'

Korinne I.B. Super

Attorney Advisor

Office of the General Counsel

Division of Information Access

301-504-7416

ksuper@cpsc.gov

Enclosures: *23-F-00592 Invoice*
RP190048 (via PAL)

Withheld pursuant to exemption

(b)(4) ; (b)(3):CPSA Section 6(a)

of the Freedom of Information Act

Withheld pursuant to exemption

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Withheld pursuant to exemption

(b)(4) ; (b)(3):CPSA Section 6(a)

of the Freedom of Information Act



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

Sheela Kadambi
Compliance Officer
Defect Investigations Division
Office of Compliance and Field Operations

Tel: 301-504-7561
Fax: 301-504-0359
Email: SKadambi@cpsc.gov

November 08, 2018

Email: Ejones@mayerbrown.com

Erika Jones, Esq.
Mayer Brown LLP
1999 K Street, NW
Washington, DC 20006

Re: CPSC File No. RP190048
SRAM LLC
Three-Speed Internal Gear Hub with a Coaster Brake

Dear Ms. Jones:

Thank you for your report of November 7, 2018 submitted under section 15(b) of the Consumer Product Safety Act, (CPSA), 15 U.S.C. § 2064(b). (b)(4); (b)(3):CPSA Section 6(a)

(b)(4); (b)(3):CPSA Section 6(a)

You also noted that the Firm wishes to participate in the U.S. Consumer Product Safety Commission (Commission or CPSC) Fast Track Product Recall Program. This program is described at <https://www.cpsc.gov/fasttrack>. This document and the additional information provided at the end of this letter also explain the Firm's rights and responsibilities under the law.

Information Requested

To participate in the Fast Track Product Recall Program, the Firm must initiate an acceptable corrective action plan no later than **December 05, 2018**, and the Firm must **provide all of the information required to be included in a full report described at 16 C.F.R. § 1115.13(d)**. If you have not done so already, we request that you **provide a copy of the Firm's proposed corrective action plan (CAP) as described at 16 C.F.R. § 1115.20(a)**, including all draft notice material, as soon as possible, but no later than **November 21, 2018**. To assure that the Commission staff is able to evaluate the adequacy of the Firm's proposed CAP prior to its

initiation, the Firm must submit the requested full report information no later than the date on which the Firm submits the proposed CAP.

Please provide that information and those documents to the extent applicable to the Subject Products and the reported problem or issue, and in your response, please reference each regulation subsection number (1-14).

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

15. All documents, records, and information (including electronic mail and other electronic documents, records, and information) pertaining to the reported problem or issue and comprising or relating to the following: all oral and written consumer, dealer, distributor, retailer, and other complaints and claims; all warranty and insurance claims, reports, and forms; and all reports of incidents, property damage, and injuries.
 - i. Your response must include all court complaints and other documents initiating lawsuits, and all documents and records concerning the resolution of all complaints, claims, incidents, and lawsuits.
 - ii. For each telephone or other oral complaint, claim, and report identified above, include the date and contents.
 - iii. If any of the documents and records requested above are unavailable, identify them, state the reason they are unavailable, and provide a summary containing the names, addresses, and telephone numbers of the consumers, dealers, distributors, and retailers, or of their attorneys, as applicable.
16. A list of all countries other than the United States to which the Firm distributes or distributed the Subject Products, and the number of Subject Products shipped or distributed to each country. If the Subject Products were distributed in Canada and/or Mexico, please notify Health Canada and/or Profeco, respectively.
17. All pre-market and post-market test reports, analyses, and evaluations related to the reported problem or issue.
18. All documents, records, and related information pertaining to the marketing, promotion, and advertisement of each model of the Subject Products.
19. All engineering drawings, engineering change notices, requests for engineering changes, and material specifications related to the reported problem or issue.
20. All UPC codes for all models involved.

21. Please provide documentation on all deaths reported to the Firm involving this product, regardless of defect or hazard.
22. Full name, address, email address, and telephone number of each foreign manufacturer.
23. Please provide a step-by-step plan for the disposal/destruction of the recalled products (commonly referred to as reverse logistics), including contact information for any third party firms that will be handling the recalled product for destruction/repair/refurbishment.
24. The national business enterprise identification number issued to the supplier by the government of the territory in which it operates, along with the local term used for this number (e.g., Business Registration Number). Where no such number has been issued by a government, please supply a widely used commercial identification number for the foreign supplier, such as the local equivalent of a D-U-N-S® number.
25. When the CAP begins, the Office of Compliance and Field Operations will monitor the progress of the recall. The staff requests that the Firm provide a list of all retailers and distributors to which the Firm sold the product. The list must include the retailer/distributor name and address, and the number of Subject Product units the Firm shipped to each retailer/distributor. Please provide the list in electronic format sorted by zip code or state. Commission monitoring of the CAP may include Commission Field Investigator visits of the Firm. Such visits will include a review of the Firm's implementation of the recall and verification of its plans for the correction and/or disposal of returned recalled products in accordance with the CAP. In addition, Commission Field Investigators and/or State Investigators may be contacting retailers and consumers who received the recalled products to confirm their receipt of the approved notification materials and compliance with the associated instructions pursuant to the CAP.

Contact Information

Please send correspondence electronically to SKadambi@cpsc.gov. If you cannot provide this information electronically, you may direct your correspondence to me at: Office of Compliance and Field Operations, U.S. Consumer Product Safety Commission, Room 610, 4330 East West Highway, Bethesda, MD 20814-4408. Please reference the file number stated above in your response. If you seek assistance, or if you have any questions, you may contact me at 301-504-7561.

Thank you for your cooperation.

Sincerely,



Sheela Kadambi
Compliance Officer
Defect Investigations Division

Links:

- Recall Guidance – <https://www.cpsc.gov/recallguidance>
- Recall Checklist – <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance/Recall-Checklist>

Additional Information

This additional information is provided to help you understand your rights and responsibilities under the laws administered by the CPSC. Please contact me at SKadambi@cpsc.gov or 301-504-7561 with any questions.

Compliance with Reporting Obligations

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, importer, distributor, and retailer of a consumer product, or of any other product or substance over which the CPSC has jurisdiction under any other statute enforced by the CPSC, who obtains information which reasonably supports the conclusion that the product (1) contains a defect which could create a substantial product hazard, (2) creates an unreasonable risk of serious injury or death, (3) fails to comply with an applicable consumer product safety rule or with a voluntary consumer product safety standard upon which the CPSC has relied under section 9 of the CPSA, 15 U.S.C. § 2058, or (4) fails to comply with any other rule, regulation, standard, or ban under the CPSA or any other statute enforced by the CPSC, to immediately inform the CPSC of the defect, risk, or failure to comply, unless the firm has actual knowledge that the CPSC has been adequately informed of the defect, risk, or failure to comply. *See* 16 C.F.R. part 1115. The absence of a staff preliminary determination does not mean that the product does not contain a defect or creates an unreasonable risk.

Failure to comply with the CPSC's reporting requirements is a prohibited act under sections 19(a)(3) and (4) of the CPSA, 15 U.S.C. §§ 2068(a)(3) and (4). Pursuant to section 20 of the CPSA, 15 U.S.C. § 2069, such violations could subject you and the Firm to civil penalties of up to \$110,000 per violation up to a maximum of \$16.025 million for any related series of violations. In addition, pursuant to section 21 of the CPSA, 15 U.S.C. § 2070, such violations could subject you and the Firm to criminal penalties including a fine, imprisonment for not more than five (5) years and forfeiture of assets associated with the violation(s).

Continuing Obligations and Duty to Preserve

The Firm has a continuing obligation to supplement or correct its full report and any other information it provides, including the information submitted in response to the above requests. If, for example, after submitting its report and information to the CPSC, the Firm receives or learns of information concerning complaints, claims, incidents, or injuries that the Firm did not report, or other information that affects the scope, prevalence, or seriousness of the reported problem, issue, or potential defect or hazard, the Firm must immediately report that information to the Office of Compliance and Field Operations.

In addition, until this matter and any related matters are resolved, there will remain the possibility of further enforcement action, including reasonably anticipated litigation. Therefore, the Firm must abide by the continuing legal obligation to preserve all information, documents, electronically-stored data, and samples, now in existence or created hereafter, related to the Subject Products.

Information Disclosure

Section 6(b)(5) of the CPSA, 15 U.S.C. § 2055(b)(5), prohibits the CPSC from releasing information submitted under section 15(b) of the CPSA unless a remedial action plan has been accepted in writing, a complaint has been issued, the submitting person consents to such release, or the CPSC publishes a finding that the public health and safety require 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, 15 U.S.C. § 2055(a)(3). The CPSC 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 days thereafter, the staff will assume that it does not consider information in the submission to be a trade secret or otherwise exempt from disclosure under section 6(a) of the CPSA and under the Freedom of Information Act, 5 U.S.C. § 552(b)(4).

Withheld pursuant to exemption

(b)(4) ; (b)(3):CPSA Section 6(a)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(4) ; (b)(3):CPSA Section 6(a)

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of the Freedom of Information Act

CONFIDENTIAL: STOP SALE

SRAM has identified an issue with certain SRAM i-Motion 3, three-speed internal gear hubs with a coaster brake (installed on bicycles with no redundant braking system). They were installed on the following Electra® model bicycles: Electra Cruiser Custom 3i, Electra Coaster 3i, Electra Hawaii 3i, Electra Hawaii 3i 24 and Electra Straight 8. The affected hubs also were sold in the aftermarket for installation on other bicycles. The affected hubs are identifiable by the text “SRAM i-Motion 3” on the hub shell and a brake arm extending from the axle of the hub. SRAM is working with the U.S. Consumer Product Safety Commission to announce a safety recall in the near future.



SRAM is asking you to check your inventory and floor samples for any Electra bicycles with SRAM i-Motion 3 internal gear hubs. If you have any in your inventory, **please remove them from sale immediately** and return the whole bicycle to your local SRAM distributor. SRAM will repurchase the bicycles at dealer wholesale cost.

SRAM will contact you again when the safety recall is ready to be announced to the public. In the meantime, **please keep this matter confidential. Do not call any customers until SRAM announces the recall.** If you have any questions, contact your SRAM Customer Service or Technical Representative.

IMPORTANT

SAFETY RECALL NOTICE

Dear Electra®/SRAM® Customer:

You may have an Electra bicycle equipped with a SRAM i-Motion 3, three-speed internal gear hub with a coaster brake.

These hubs are the subject of a safety recall. If your Electra bicycle has a SRAM i-Motion 3 internal gear hub with a coaster brake (and no redundant braking system – i.e. no front brake), PLEASE STOP RIDING YOUR BIKE until you determine whether your hub is part of the recall.

Some of the affected hubs may have been manufactured with grease in the internal gear hub that can get sticky over time, especially if the bicycle or hub is not used for a long period of time and/or exposed to high temperatures. If the grease in the internal gear hub becomes sticky, the brake pawls in the hub can fail to engage correctly, resulting in the loss of braking power. You could crash or fall from the bicycle.

To determine if your hub is part of the recall, please check if your Electra bicycle is one of the following models: Electra Cruiser Custom 3i, Electra Coaster 3i, Electra Hawaii 3i, Electra Hawaii 3i 24", Electra Straight 8. If you have one of these Electra bicycles and it contains a SRAM i-Motion 3 with coaster brake (and no redundant braking system), please contact SRAM or your local bicycle dealer for verification.

The affected hubs are readily identifiable by the text "SRAM i-Motion 3" on the hub shell. The affected hubs are also identifiable by the brake arm extending from the axle of the hub.

Photo 1: SRAM i-Motion 3, three speed internal gear hub with coaster brake



If you have an affected hub, please contact SRAM or your local bicycle dealer. SRAM will offer to repurchase your bicycle at a fair market, depreciated value, based on the Bicycle Blue Book (www.bicyclebluebook.com). If you prefer to keep your bicycle, SRAM will assist your local bicycle dealer to identify a compatible new hub that you can request to be installed in place of the affected hub. You can apply some of the repurchase funds toward that new hub and the installation labor, and you can keep the remainder of the funds.

We apologize for this inconvenience, but your safety is our priority. For questions about this recall, call 800-346-2928 or check our website at www.sram.com. SRAM will conduct this recall in cooperation with U.S. Consumer Product Safety Commission.





VOLUNTARY SAFETY RECALL NOTICE

To: Electra®/SRAM® Dealers
Subject: SRAM® i-Motion 3 internal gear hub (coaster brake version)
From: SRAM, LLC
Date: January 18, 2019

To our valued dealers,

SRAM will work with the U.S. Consumer Product Safety Commission to announce a voluntary product recall of certain SRAM i-Motion 3, three-speed internal gear hubs with a coaster brake. SRAM has determined that some of the affected hubs may have been manufactured with grease in the internal gear hub that may become sticky thus causing the brake pawls in the hub to engage incorrectly, and result in the loss of braking power.

This presents a safety issue. As a result SRAM is recalling the hub on all Electra bicycles and hubs sold in the aftermarket that were installed on a bicycle with a coaster brake.

THIS ISSUE IS SAFETY RELATED. First, SRAM requests that you check your inventory to see whether you have any affected inventory of Electra bicycles or of aftermarket i-Motion 3 hubs. If you do, please quarantine the inventory and refrain from selling it to the public. In connection with the recall, SRAM will be advising consumers to stop using these products immediately. In the near future, we will be asking you to help us inform customers about the recall by posting a Safety Recall Poster in your store, which we will provide to you after coordination with U.S. Consumer Product Safety Commission. Failure of SRAM i-Motion 3 internal gear hubs, while in use, may result in loss of bicycle control and possible injury.

ISSUE

Some of the affected hubs may have been manufactured with grease in the internal gear hub that can get sticky over time, especially if the bicycle or hub is not used for a long period of time and/or exposed to high temperatures. If the grease in the internal gear hub becomes sticky, the brake pawls in the hub can fail to engage correctly, resulting in the loss of braking power. You could crash or fall from the bicycle.

CONSUMERS

SRAM will work with the U.S. Consumer Product Safety Commission to develop the materials to be used to notify consumers about this recall. We will advise you when this recall is going to be announced publicly to consumers. In the public announcement, we will be asking consumers owning one of these





products to stop riding immediately and return their bicycle to any SRAM dealer for verification of the product.

SRAM DEALER ACTION

Any dealer who has one or more new Electra bicycles with SRAM i-Motion 3 internal gear hubs installed (with no redundant braking system) can return the whole bicycle to their local SRAM DSD. SRAM will repurchase the bicycles at Dealer wholesale cost. For consumer-owned bicycles containing an affected hub, SRAM will repurchase the affected bicycle at a fair market, depreciated value, based on the Bicycle Blue Book (www.bicyclebluebook.com). Dealers are required to return the hub to SRAM with proof of value of the bicycle and in return SRAM will send the dealer a check for the value of the bicycle so they can reimburse the consumer. SRAM will reimburse dealers a flat \$50 for the labor costs. Recognizing that some consumers may prefer to keep their bicycles, SRAM will also develop and facilitate distribution of information for consumers and retailers about which aftermarket hub (or hubs) is compatible with the Electra bicycle, and will provide you with installation instructions for the compatible replacement hubs.

PRODUCT AFFECTED AND SERIAL NUMBERS

There is no serial number on the affected hubs. The affected hubs were installed on the following Electra model bicycles: Electra Cruiser Custom 3i, Electra Coaster 3i, Electra Hawaii 3i, Electra Hawaii 3i 24", and Electra Straight 8. The approximate retail sale of the Electra bicycles was from April 2010 to May 2018.

SRAM DEALER CUSTOMERS - PRODUCT IDENTIFICATION PROCEDURES

The UPC code of the hub is 710845662782. The UPC code does not appear on the hub. However, the affected hubs are readily identifiable by the text "SRAM i-Motion 3" on the hub shell. The affected hubs are also identifiable by the brake arm extending from the axle of the hub.

Photo 1: SRAM i-Motion 3 internal gear hub with a coaster brake



SRAM.



For further information, please contact your SRAM Customer Service or Technical Representative. SRAM regrets this inconvenience and appreciates the support of our dealers and service locations regarding this concern.

Thank you,

SRAM, LLC

SRAM.



Avid.

TRUVATIV

ZIPPER

QUARK

IMPORTANT SAFETY NOTICE

SRAM® i-Motion 3, three-speed internal gear hub



SRAM, LLC has determined that some of the SRAM i-Motion 3, three-speed internal gear hubs may have been manufactured with grease in the internal gear hub that can get sticky over time, especially if the bicycle or hub is not used for a long period of time and/or exposed to high temperatures. If the grease in the internal gear hub becomes sticky, the brake pawls in the hub can fail to engage correctly, resulting in the loss of braking power. You could crash or fall from the bicycle.

The affected hubs were installed on the following Electra® model bicycles: Electra Cruiser Custom 3i, Electra Coaster 3i, Electra Hawaii 3i, Electra Hawaii 3i 24" and Electra Straight 8. The affected hubs are readily identifiable by the text "SRAM i-Motion 3" on the hub shell. The affected hubs are also identifiable by the brake arm extending from the axle of the hub. The affected hubs were also sold in the aftermarket for installation on other bicycles.

Consumers with Electra bicycles or other bicycles equipped with potentially affected SRAM i-Motion 3 internal gear hubs and no redundant braking system should stop riding immediately and return their bicycle to SRAM for verification. SRAM will offer to repurchase the affected bicycle at a fair market, depreciated value, based on the Bicycle Blue Book (www.bicyclebluebook.com).

Call (800) 346-2928 from 10 a.m. to 7 p.m. Eastern Time, Monday through Thursday, or 10 a.m. to 6 p.m. Eastern Time, Friday with any questions.

This recall will be conducted in cooperation with the U.S. Consumer Product Safety Commission.

For more information, please go to our website: www.SRAM.com

Retailer: Please post until June 1, 2019

Withheld pursuant to exemption

(b)(4) ; (b)(3):CPSA Section 6(a)

of the Freedom of Information Act

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UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207
DIRECTORATE FOR EPIDEMIOLOGY

TO: Sheela Kadambi, Compliance Officer, EXC
FROM: John Topping, Technical Officer, EPHA
DATE: 12/10/2018
RE: Data Review for PSA # 0115.19 Case # [RP190048](#)

Date due: 12/14/2018

Priority: X

Product Description: three-speed internal gear hub with a coaster brake, for a bicycles

Company: [SRAM LLC](#)

Brand: SRAM

Model: SRAM i-Motion 3

Request: Please search the [C]PSC database for any reported incidents with respect to the subject model product.

Hazard Pattern: 3.5 – Fall

Selection Criteria:

Product Code(s): 5040 5033

Manufacturer/Model Text: SRAM/motion

Narrative Text:

Time Frame: 04/01/2010 – 12/06/2018

NFIRS Search Criteria: N/A (no code applies for this hazard and product with respect to equipment involved in ignition [with fire department response])

Incidents Identified:

Databases	Incident Count* (see notes below)	Death Count*
Consumer Product Safety Risk Management System (CPSRMS)	0	0
NEISS reports (count)	0	0
Fire reports (NFIRS)	N/A	N/A
Total	0	0

* For CPSRMS, duplicate reports have been removed, i.e. counted only once, with only record presented in spreadsheet. Any duplicate reports within CPSRMS can be accessed using the incident report ID link. The reports enumerated in the table have been identified from CPSC databases on the date the search was completed. These should be considered neither a statistical sample nor a complete count of all such incidents, but only a count of those in CPSC databases on the search date.

(b)(3):CPSA Section 6(b)(1)

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(b)(4) ; (b)(3):CPSA Section 6(a)

of the Freedom of Information Act

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(b)(4) ; (b)(3):CPSA Section 6(a)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(5)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(5)

of the Freedom of Information Act



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

Sheela Kadambi
Compliance Officer
Defect Investigations Division
Office of Compliance and Field Operations

Tel: 301-504-7561
Fax: 301-504-0359
Email: SKadambi@cpsc.gov

February 22, 2019

Email: Ejones@mayerbrown.com

Erika Z. Jones, Esquire
Mayer Brown LLP
1999 K Street NW
Washington, DC 20006

Re: CPSC File No. RP190048
SRAM LLC
i-Motion 3 internal gear hubs

Dear Ms. Jones:

Thank you for your report of November 21, 2018, under section 15(b) of the Consumer Product Safety Act (CPSA), 15 U.S.C. § 2064(b) on behalf of SRAM LLC (Firm), and for initiating a corrective action plan (CAP) to address the reported problem with the SRAM i-Motion 3, three-speed internal gear hub with a coaster brake, for a bicycles (Subject Products).

(b)(4); (b)(3):CPSA Section 6(a)

The staff of the Office of Compliance and Field Operations of the U.S. Consumer Product Safety Commission (Commission or CPSC) has reviewed the actions proposed by the Firm. Acting under delegation from the Commission and **upon receipt of a signed copy of this CAP**, pursuant to 16 C.F.R. § 1115.20(a)(1)(ix), the staff will accept the CAP actions listed below as adequate.

(b)(3):CPSA Section 6(b)(1)

(b)(3):CPSA Section 6(b)(1)

Please continue the corrective actions implemented and initiate any others contained in the CAP. The Office of Compliance and Field Operations recommends that recalling firms take appropriate steps to identify all owners of the recalled products. Recalling firms are encouraged to monitor online resale, auction, and wholesale websites. When the recalling Firm sees the recalled product being sold on these sites, notification should be made to the seller advising them of the recall and offering them the remedy agreed to in the CAP. The Office of Compliance and Field Operations will be monitoring the CAP, as well as online sites in an effort to prohibit the sale of recalled products.

Monthly Progress Report Submission

By the first of each month, please submit progress reports on the CAP using the Monthly Progress Report Business Portal. Please click on the link below for instructions on how to login. <https://www.cpsc.gov/content/monthly-progress-report-system>.

When completing the progress report form, please pay special attention to Section II regarding incident data. Report incident/injury/death data that occurred *prior* to your implementation of the CAP, as well as incident/injury/death data that occurs *after* your implementation of the CAP for the specified reporting period. Report based on the actual date on which the incident occurred and not the date on which you received the information. The data being reported should be for the specified reporting period only and not a cumulative total. For any newly-reported information, please also provide with the monthly progress report all consumer contact information for all incidents (pre- and post-recall) so that we may follow up

with the consumer. If you have any questions, please contact Sheela Kadambi: at 301-504-7561 or SKadambi@cpsc.gov. Please reference the file number stated above in your response. Please also see the attached “Monthly Progress Reporting Consent Form.”

CPSC Staff Monitoring of Corrective Action Plan

In addition to reviewing the Firm’s monthly progress reports, the CPSC staff will be monitoring implementation of the CAP through field investigator verification visits of the Firm. Such visits will review the Firm’s implementation of the CAP and verify that its plans for the correction and/or disposal of returned Subject Products have been proceeding in accordance with the CAP. In addition, field investigators and/or state investigators may be contacting retailers and consumers who may have received the Subject Products to confirm their receipt of the approved notification material and the Firm’s compliance with the associated instructions pursuant to the CAP. If the Firm wishes to change the terms of the CAP, it must discuss a proposal with the CPSC staff before implementing any changes.

When the Firm determines that the CAP has been implemented to the best of the Firm’s ability and as many products as possible have been removed from the marketplace, it may submit a final progress report, referencing the file number, and request that the file be closed. At that time, the CPSC staff will review the CAP’s progress and decide whether the file should be closed. A CPSC field investigator may conduct a close-out recall inspection of the Firm upon the Firm’s request that the file be closed. Information will be reviewed at that time concerning the number of notifications made to consumers and the number of products returned and/or corrected, so records should be retained in the event of such an inspection. The Office of Compliance and Field Operations will evaluate the effectiveness of the CAP. The CPSC staff could seek broader corrective action if the CAP does not prove effective. When the CPSC staff closes its file on a CAP, we will request that the Firm continue the CAP and continue to maintain the Firm’s toll-free recall number as a means for consumers to reach the Firm about the recall. Should the Firm decide to change or discontinue its toll-free recall number, the Firm should immediately notify the CPSC staff (Office of Compliance and Field Operations) and provide a new recall contact number for the Firm. This information will be maintained by the CPSC staff and provided to consumers and others seeking information on the recall or CAP.

Compliance with Reporting Obligations

The CPSC 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, importer, distributor, and retailer of a consumer product, or of any other product or substance over which the CPSC has jurisdiction under any other statute enforced by the CPSC, who obtains information which reasonably supports the conclusion that the product (1) contains a defect which could create a substantial product hazard, (2) creates an unreasonable risk of serious injury or death, (3) fails to comply with an applicable consumer product safety rule or with a voluntary consumer product safety standard upon which the CPSC has relied under section 9 of the CPSA, 15 U.S.C. § 2058, or (4) fails to comply with any other rule, regulation, standard, or ban under the CPSA or any other statute enforced by the CPSC, to immediately inform the CPSC of the defect, risk, or failure to comply, unless the Firm has actual knowledge

that the CPSC has been adequately informed of the defect, risk, or failure to comply. *See* 16 C.F.R. part 1115. The absence of a staff preliminary determination does not mean that the product does not contain a defect or creates an unreasonable risk.

Failure to comply with the CPSC's reporting requirements is a prohibited act under sections 19(a)(3) and (4) of the CPSA, 15 U.S.C. §§ 2068(a)(3) and (4). Pursuant to section 20 of the CPSA, 15 U.S.C. § 2069, knowing violations could subject you and the Firm to civil penalties of up to \$110,000 per violation up to a maximum of \$16.025 million for any related series of violations. In addition, pursuant to section 21 of the CPSA, 15 U.S.C. § 2070, certain violations could subject you and the Firm to criminal penalties including a fine, imprisonment for not more than five (5) years and forfeiture of assets associated with the violation(s).

Continuing Obligations and Duty to Preserve

If the Firm receives or learns of any information concerning complaints, claims, incidents, or injuries that the Firm did not report, or other information affecting the scope, prevalence, or seriousness of the reported problem, issue, or potential defect or hazard, the Firm must immediately report that information to the CPSC (Office of Compliance and Field Operations). Additionally, if the Firm receives information that might indicate that its corrective actions are not satisfactory in eliminating the problem, the risk of injury, or the potential defect or hazard, or that the effectiveness of the CAP is less than had been anticipated, it must immediately report that information to the CPSC (Office of Compliance and Field Operations). In addition, under section 19(a)(2)(B) of the CPSA, 15 U.S.C. § 2068(a)(2)(B), it is unlawful to sell, offer for sale, manufacture for sale, distribute in commerce, or import into the United States a product that is covered by a manufacturer's corrective action plan created in consultation with, and publicized by, the Commission.

Until this matter and any related matters are resolved, there will remain the possibility of further enforcement action, including reasonably anticipated litigation. Therefore, the Firm must abide by the continuing legal obligation to preserve all information, documents, electronically-stored data, and samples, now in existence or created hereafter, related to the Subject Products.

Information Disclosure

Section 6(b)(1) of the CPSA, 15 U.S.C. § 2055(b)(1), requires the Commission to provide manufacturers and private labelers with advance notice and opportunity to comment on any information the Commission intends to disclose, if the public can readily ascertain the identity of the Firm from the information the Commission intends to disclose. *See* 16 C.F.R. part 1101. Please include with any comments specific information and documents, where available, to support any claim that the information proposed to be disclosed is inaccurate. If the Commission decides to disclose the information, over any accuracy objections, it will give the Firm five (5) days' notice, as required by section 6(b)(2) of the CPSA, 15 U.S.C. § 2055(b)(2), unless the Commission publishes a finding that the public health and safety require less notice. The staff is enclosing a summary of the CAP which the Commission intends to disclose to the public. **For full consideration, your written comments on that summary must be received within 10 calendar days of the date of this letter.**

Contact Information

Thank you for your continued cooperation in this matter. If you have any questions, please contact me at 301-504-7561 or SKadambi@cpsc.gov. Written correspondence may be addressed to: Office of Compliance and Field Operations, U.S. Consumer Product Safety Commission, Room 610, 4330 East West Highway, Bethesda, MD 20814-4408.

Sincerely,

A handwritten signature in black ink that reads "Sheela Kadambi". The signature is written in a cursive, flowing style.

Sheela Kadambi
Compliance Officer
Defect Investigations Division

By signing below pursuant to 16 C.F.R. § 1115.20(a)(1)(ix) the Firm, through an authorized representative, hereby agrees to undertake the actions set forth in the CAP document and to abide by the terms and conditions therein. The CAP shall be deemed effective upon staff's receipt of a signed copy of this CAP.

SIGNATURE & DATE: _____

NAME: _____

TITLE: _____

Voluntary Corrective Action Plans Under Section 15
of the Consumer Product Safety Act and
Section 15 of the Federal Hazardous Substances Act

The following is a list of voluntary corrective action plans recently accepted by the Commission (or the staff acting under authority delegated by the Commission). A firm's taking corrective action does not constitute an admission by the firm that a substantial product hazard exists.

Space does not permit the staff to give a complete list of the specific model numbers of the products involved in each of these corrective actions. Consumers who believe that they have a product affected by one of these actions should follow the instructions given in this list or contact either the manufacturer or the Commission to determine if their product is one of those affected.

Corrective Action Plan Summary:

DATE	FIRM AND PRODUCT	ALLEGED HAZARD	CORRECTION NARRATIVE
February 2019	SRAM LLC 1000 W. Fulton Market, 4th Floor Chicago, IL 60607 SRAM i-Motion 3, three-speed internal gear hub with a coaster brake, for a bicycles:	Crash or fall	Partial refund

Monthly Progress Reporting Consent Form

The staff of the Office of Compliance and Field Operations of the U.S. Consumer Product Safety Commission has enclosed a summary of the Monthly Progress Report Spreadsheet Format (see below). The Spreadsheet will be populated and updated on a monthly basis with the information you provide to the Commission in your Monthly Progress Reports.

Section 6(b)(1) of the CPSA, 15 U.S.C. § 2055(b)(1), requires the Commission to provide manufacturers and private labelers with advance notice and opportunity to comment on any information the Commission intends to disclose, if the public can readily ascertain the identity of the Firm from the information the Commission intends to disclose. *See* 16 C.F.R. part 1101. Please include with any comments specific information and documents, where available, to support any claim that the information proposed to be disclosed is inaccurate. If the Commission decides to disclose the information, over any accuracy objections, it will give the Firm five (5) days' notice, as required by section 6(b)(2) of the CPSA, 15 U.S.C. § 2055(b)(2), unless the Commission publishes a finding that the public health and safety requires a lesser period of notice. The Spreadsheet below shows the categories of information the Commission intends to disclose to the public. As noted in the Spreadsheet, this includes the total number of products recalled and the number of corrections by manufacturer, distributor, retailer and consumer (this information will be populated with the information you report to CPSC in your monthly progress reports).

In addition to the provisions of section 6(b), pursuant to section 6(a)(3) of the CPSA, 15 U.S.C. § 2055(a)(3), you also have the opportunity to mark the information as confidential and therefore barred from disclosure pursuant to section 6(a)(2) of the CPSA, 15 U.S.C. § 2055(a)(2). To make our decision as to exempt information, the Commission relies on product manufacturers, private labelers, or importers to identify those portions of their information they believe are confidential and to justify these claims. In justifying any claim that the submitted information contains trade secrets or confidential commercial information as defined by section 6(a)(2) of the CPSA, you need to refer to requirements at 16 C.F.R. § 1015.18(c). If the CPSC staff determines that the information may be disclosed because it is not confidential information as provided in section 6(a)(2) of the CPSA, CPSC staff will notify you in writing before disclosure of the information with a date certain set for public disclosure. Under section 6(a)(5) of the CPSA, the release date for public disclosure of the information, may not be less than 10 days before your receipt of our notification to you.

For full consideration, your written comments concerning sections 6(a) and (b) must be received within 15 calendar days after the date of receipt of this letter.

Monthly Progress Report Spreadsheet Format:

NOTE: THIS EXCEL SPREADSHEET CONTAINS THE MOST UP-TO-DATE DATA								
FIRM NAME	PRODUCT DESCRIPTION	PRESS RELEASE NUMBER	TOTAL # OF PRODUCTS RECALLED	# OF PRODUCTS CORRECTED MANUFACTURER LEVEL	# OF PRODUCTS CORRECTED DISTRIBUTOR LEVEL	# OF PRODUCTS CORRECTED RETAILER LEVEL	# OF PRODUCTS CORRECTED CONSUMER LEVEL	TOTAL # OF PRODUCTS CORRECTED

By signing below the Firm agrees to the Commission posting the information that the Firm transmits in their Monthly Progress Reports.

SIGNATURE & DATE: _____

NAME: _____

TITLE: _____

U.S. CONSUMER PRODUCT SAFETY COMMISSION
Office of Compliance and Field Operations
FOR OFFICIAL USE ONLY

REQUEST FOR FIELD SERVICES

Date: February 26, 2019

File Number: RP190048

To: Judy Smith
Recall Coordinator

From: Sheela Kadambi
301-504-7561
SKadambi@cpsc.gov

Firm: SRAM LLC
1000 W. Fulton Market, 4th Floor
Chicago, IL 60607

Firm Contact:

no telephone provided
No Company Contact provided

Product: SRAM; SRAM i-Motion 3; three-speed internal gear hub with a coaster brake,
for a bicycles:

Monitoring Request:

Assign ____ checks at retail locations or distributors

Assign ____ telephone checks with consumers

Assign ____ internet checks

Is there a poster for this recall? Yes____ No____

Recall Notification Types Used: (Write in all forms of notice the recalling firm used)

Special instructions:

CPSC Monthly Progress Report for Corrective Action Plans (CAP)

Case Number: RP190048

Reporting Dates: _____ to _____

Compliance Officer: Sheela Kadambi

Recalling Firm: SRAM LLC

Product: three-speed internal gear hub with a coaster

I) PRODUCTS CORRECTED BY FIRM AS APPLICABLE UNDER CAP

Location of Products	Total Products Affected by Recall	Corrections this Reporting Period	Total Cumulative Corrections for Recall
With Manufacturer:	_____	_____	_____
With Distributor:	_____	_____	_____
With Retailers:	_____	_____	_____
With Consumers:	_____	_____	_____
TOTAL:	_____	_____	_____

II) INCIDENT UPDATE

	Total Incidents Reported this Period that Occurred <u>Before</u> the Recall	Total Incidents Reported this Period that Occurred <u>After</u> the Recall
Incidents	_____	_____
Injuries	_____	_____
Death	_____	_____

III) Notifications Made by Firm and Consumer Response as Applicable under CAP

How many consumers did you notify this reporting period by:

Phone: # _____

Email: # _____

Regular Mail: # _____

How many consumers contacted your Firm this reporting period about the recall as a result of any notification?

Phone: # _____

Email: # _____

Regular Mail: # _____

Registration Cards: # _____

Is the recall currently posted on your homepage? _____, If no, explain: _____

How many website hits did your Firm have this reporting period for this recall? # _____

As applicable under your CAP, how many times in this reporting period did your Firm post the recall notice on the following?

Facebook: # _____ # of shares: _____ # of Likes: _____

Twitter: # _____ # of Re-Tweets: _____ # of Twitter Followers: _____

Other: # _____ Explain: _____

Ad Placements: # _____ Explain: _____

Recalling companies are encouraged to monitor on line re-sale, auction, and wholesale websites. If monitored, did you find the recalled product on any sites ☐ Yes / ☐ No – Describe action taken: _____

NOTE: Email or Fax completed form by the FIRST of EACH MONTH to Judy Smith, Recall Coordinator, at: jsmith@cpsc.gov or 301-504-0359. If you have questions, contact your Compliance Officer.

Updated 10/2015

From: [Jones, Erika Z.](#)
To: [Smith, Judy](#); [Kadambi, Sheela](#)
Cc: [Jones, Erika Z.](#)
Subject: SRAM RP190048
Date: Tuesday, July 16, 2019 5:14:23 PM
Attachments: [SRAM RP 190048 June 2019 Monthly Progress Report i3 hub.pdf](#)

Please see the monthly progress report for the Corrective Action Campaign in progress.

Thank you.

Erika Z. Jones

Partner

Mayer Brown LLP

1999 K Street, N.W.

Washington, D.C. 20006-1101 United States of America

T +1 202 263 3232

ejones@mayerbrown.com

mayerbrown.com

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CPSC Monthly Progress Report for Corrective Action Plans (CAP)

Case Number: RP 190048

Reporting Dates	6/1/2019 to 6/30/2019	Compliance Officer:	Sheela Kadambi
Recalling Firm:	SRAM, LLC	Product:	SRAM iMotion 3 internal gear hubs

I) PRODUCTS CORRECTED BY FIRM AS APPLICABLE UNDER CAP			
Location of Products	Total Products Affected by Recall	Corrections this Reporting Period	Total Cumulative Corrections for Recall
With Manufacturer:	(b)(4); (b)(3):CPSA Section 6(a)		
With Distributor: **			
With Retailers:			
With Consumers:			
TOTAL:	6993	(b)(4); (b)(3):CPSA Section 6(a)	
(b)(4); (b)(3):CPSA Section 6(a)			

II) INCIDENT UPDATE		
	Total incidents Reported this Period that Occurred <u>Before</u> the Recall	Total Incidents Reported this Period that Occurred <u>After</u> the Recall
Incidents	(b)(4); (b)(3):CPSA Section 6(a)	
Injuries		
Deaths		

III) Notifications Made by Firm and Consumer Responses as Applicable under CAP			
How many consumers did you notify this reporting period by:			
Phone:	#		
Email:	#		
Regular Mail:	#		
How many consumers contacted your Firm this reporting period about the recall as a result of any notification?			
Phone:	#	(b)(4); (b)(3):CPSA Section 6(a)	
Email:	#		
Regular Mail:	#		
Registration Cards:	#		
Is the recall currently posted on your homepage? YES ___ If no, explain: _____			
How many website hits did your Firm have this reporting period for this recall? # (b)(4); (b)(3):CPSA			
As applicable under your CAP, how many times in this reporting period did your Firm post the recall notice on the following:			
Facebook:	#	# of shares:	# of Likes: _____
Twitter:	#	# of Re-Tweets: _____	# of Twitter Followers: (b)(4); (b)(3):CPSA
Other:	#	Explain: _____	
Ad Placements:	#	Explain: _____	
Recalling companies are encouraged to monitor on line re-sale, auction, and wholesale websites. If monitored, did you find the recall product on any sites <input type="checkbox"/> Yes / <input type="checkbox"/> No - Describe action taken: _____			

NOTE: Email or Fax completed from by the FIRST of EACH MONTH to Judy Smith, Recall Coordinator, at: jsmith@cpsc.gov or 301-504-0359. If you have questions, contact your Compliance Officer.

Updated 10/2015

From: [Jones, Erika Z.](#)
To: [Smith, Judy](#); [Kadambi, Sheela](#)
Cc: [Jones, Erika Z.](#)
Subject: SRAM Electra Hub RP190048
Date: Sunday, June 30, 2019 2:02:47 PM
Attachments: [SRAM RP190048 May 2019 Monthly Progress Report.pdf](#)

Please see the progress report for the Corrective Action Plan in progress.

Thank you.

Erika Z. Jones

Partner

Mayer Brown LLP

1999 K Street, N.W.

Washington, D.C. 20006-1101 United States of America

T +1 202 263 3232

ejones@mayerbrown.com

mayerbrown.com

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CPSC Monthly Progress Report for Corrective Action Plans (CAP)

Case Number: RP 190048

Reporting Dates <u>5/1/2019</u> to <u>5/31/2019</u>	Compliance Officer: <u>Sheela Kadambi</u>
Recalling Firm: <u>SRAM, LLC</u>	Product: <u>SRAM iMotion 3 internal gear hubs</u>

I) PRODUCTS CORRECTED BY FIRM AS APPLICABLE UNDER CAP			
Location of Products	Total Products Affected by Recall	Corrections this Reporting Period	Total Cumulative Corrections for Recall
With Manufacturer:	(b)(4); (b)(3):CPSA Section 6(a)		
With Distributor: **			
With Retailers:			
With Consumers:			
TOTAL:	6993	(b)(4); (b)(3):CPSA Section 6(a)	
(b)(4); (b)(3):CPSA Section 6(a)			
II) INCIDENT UPDATE			
	Total incidents Reported this Period that Occurred <u>Before</u> the Recall	Total Incidents Reported this Period that Occurred <u>After</u> the Recall	
Incidents	(b)(4); (b)(3):CPSA Section 6(a)		
Injuries			
Deaths			

III) Notifications Made by Firm and Consumer Responses as Applicable under CAP			
How many consumers did you notify this reporting period by:			
Phone:	#		
Email:	#		
Regular Mail:	#		
How many consumers contacted your Firm this reporting period about the recall as a result of any notification?			
Phone:	#	(b)(4); (b)(3):CPSA Section 6(a)	
Email:	#		
Regular Mail:	#		
Registration Cards:	#		
Is the recall currently posted on your homepage? YES If no, explain: _____			
How many website hits did your Firm have this reporting period for this recall? # (b)(4); (b)(3):CPSA Section 6(a)			
As applicable under your CAP, how many times in this reporting period did your Firm post the recall notice on the following:			
Facebook:	#	# of shares:	# of Likes: _____
Twitter:	#	# of Re-Tweets:	# of Twitter Followers: (b)(4); (b)(3):CPSA Section 6(a)
Other:	#	Explain:	
Ad Placements:	#	Explain:	
Recalling companies are encouraged to monitor on line re-sale, auction, and wholesale websites. If monitored, did you find the recall product on any sites <input type="checkbox"/> Yes / <input type="checkbox"/> No - Describe action taken: _____			

NOTE: Email or Fax completed from by the FIRST of EACH MONTH to Judy Smith, Recall Coordinator, at: jsmith@cpsc.gov or 301-504-0359. If you have questions, contact your Compliance Officer.

Updated 10/2015

From: [Jones, Erika Z.](#)
To: [Smith, Judy](#); [Kadambi, Sheela](#)
Cc: [Jones, Erika Z.](#)
Subject: SRAM Electra RP190048
Date: Wednesday, May 15, 2019 2:18:06 PM
Attachments: (b)(3):CPSA Section 6(b)(1)

Please see the attached progress report for the corrective action plan in progress. (b)(3):CPSA Section 6(b)(1)
(b)(3):CPSA Section 6(b)(1)

Thank you.

Erika Z. Jones

Partner

Mayer Brown LLP
1999 K Street, N.W.
Washington, D.C. 20006-1101 United States of America
T +1 202 263 3232

ejones@mayerbrown.com
mayerbrown.com

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CPSC Monthly Progress Report for Corrective Action Plans (CAP)

Case Number: RP 190048

Reporting Dates	2/21/2019 to 3/31/2019	Compliance Officer:	Sheela Kadambi
Recalling Firm:	SRAM, LLC	Product:	SRAM iMotion 3 internal gear hubs

I) PRODUCTS CORRECTED BY FIRM AS APPLICABLE UNDER CAP			
Location of Products	Total Products Affected by Recall	Corrections this Reporting Period	Total Cumulative Corrections for Recall
With Manufacturer:	(b)(4); (b)(3):CPSA Section 6(a)		
With Distributor: **			
With Retailers:			
With Consumers:			
TOTAL:	6993	(b)(4); (b)(3):CPSA Section 6(a)	
(b)(4); (b)(3):CPSA Section 6(a)			
II) INCIDENT UPDATE			
	Total incidents Reported this Period that Occurred <u>Before</u> the Recall	Total Incidents Reported this Period that Occurred <u>After</u> the Recall	
Incidents	(b)(4); (b)(3):CPSA Section 6(a)		
Injuries			
Deaths			

III) Notifications Made by Firm and Consumer Responses as Applicable under CAP			
How many consumers did you notify this reporting period by:			
Phone:	#	_____	
Email:	#	_____	
Regular Mail:	#	_____	
How many consumers contacted your Firm this reporting period about the recall as a result of any notification?			
Phone:	#	(b)(4); (b)(3):CPSA Section 6(a)	
Email:	#	_____	
Regular Mail:	#	_____	
Registration Cards:	#	_____	
Is the recall currently posted on your homepage? YES ___ If no, explain: _____			
How many website hits did your Firm have this reporting period for this recall? # (b)(4); (b)(3):CPSA			
As applicable under your CAP, how many times in this reporting period did your Firm post the recall notice on the following:			
Facebook:	#	# of shares:	# of Likes: _____
Twitter:	#	# of Re-Tweets:	# of Twitter Followers: (b)(4); (b)(3):CPSA
Other:	#	Explain: _____	
Ad Placements:	#	Explain: _____	
Recalling companies are encouraged to monitor on line re-sale, auction, and wholesale websites. If monitored, did you find the recall product on any sites <input type="checkbox"/> Yes / <input type="checkbox"/> No - Describe action taken: _____			

NOTE: Email or Fax completed from by the FIRST of EACH MONTH to Judy Smith, Recall Coordinator, at: jsmith@cpsc.gov or 301-504-0359. If you have questions, contact your Compliance Officer.

Updated 10/2015

CPSC Monthly Progress Report for Corrective Action Plans (CAP)

Case Number: RP 190048

Reporting Dates	4/1/2019 to 4/30/2019	Compliance Officer:	Sheela Kadambi
Recalling Firm:	SRAM, LLC	Product:	SRAM iMotion 3 internal gear hubs

I) PRODUCTS CORRECTED BY FIRM AS APPLICABLE UNDER CAP

Location of Products	Total Products Affected by Recall	Corrections this Reporting Period	Total Cumulative Corrections for Recall
With Manufacturer:	(b)(4); (b)(3):CPSA Section 6(a)		
With Distributor: **			
With Retailers:			
With Consumers:			
TOTAL:	6993	(b)(4); (b)(3):CPSA Section 6(a)	
(b)(4); (b)(3):CPSA Section 6(a)			

II) INCIDENT UPDATE

	Total incidents Reported this Period that Occurred <u>Before</u> the Recall	Total Incidents Reported this Period that Occurred <u>After</u> the Recall
Incidents	(b)(4); (b)(3):CPSA Section 6(a)	
Injuries		
Deaths		

III) Notifications Made by Firm and Consumer Responses as Applicable under CAP

How many consumers did you notify this reporting period by:

Phone: # _____

Email: # _____

Regular Mail: # _____

How many consumers contacted your Firm this reporting period about the recall as a result of any notification?

Phone: # (b)(4); (b)(3):CPSA Section 6(a)

Email: # _____

Regular Mail: # _____

Registration Cards: # _____

Is the recall currently posted on your homepage? YES ___ If no, explain: _____

How many website hits did your Firm have this reporting period for this recall? # (b)(4); (b)(3):CPSA Section 6(a)

As applicable under your CAP, how many times in this reporting period did your Firm post the recall notice on the following:

Facebook: # _____ # of shares: _____ # of Likes: _____

Twitter: # _____ # of Re-Tweets: _____ # of Twitter Followers: (b)(4); (b)(3):CPSA

Other: # _____ Explain: _____

Ad Placements: # _____ Explain: _____

Recalling companies are encouraged to monitor on line re-sale, auction, and wholesale websites. If monitored, did you find the recall product on any sites ☐ Yes / ☐ No - Describe action taken: _____

NOTE: Email or Fax completed from by the FIRST of EACH MONTH to Judy Smith, Recall Coordinator, at: jsmith@cpsc.gov or 301-504-0359. If you have questions, contact your Compliance Officer.

Updated 10/2015

From: [Jones, Erika Z.](#)
To: [Smith, Judy](#); [Kadambi, Sheela](#)
Cc: [Jones, Erika Z.](#)
Subject: SRAM RP190048 March 2019 Monthly Progress Report i3 hub.pdf
Date: Monday, April 15, 2019 4:37:17 PM
Attachments: [SRAM RP190048 March 2019 Monthly Progress Report i3 hub.pdf](#)

Please see the attached progress report for the Corrective Action Program in progress.

Thank you.

Erika Jones

Erika Z. Jones

Partner

Mayer Brown LLP
1999 K Street, N.W.
Washington, D.C. 20006-1101 United States of America
T +1 202 263 3232

ejones@mayerbrown.com
mayerbrown.com

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CPSC Monthly Progress Report for Corrective Action Plans (CAP)

Case Number: RP 190048

Reporting Dates	2/21/2019 to 3/31/2019	Compliance Officer:	Sheela Kadambi
Recalling Firm:	SRAM, LLC	Product:	SRAM iMotion 3 internal gear hubs

I) PRODUCTS CORRECTED BY FIRM AS APPLICABLE UNDER CAP			
Location of Products	Total Products Affected by Recall	Corrections this Reporting Period	Total Cumulative Corrections for Recall
With Manufacturer:	(b)(4); (b)(3):CPSA Section 6(a)		
With Distributor: **			
With Retailers:			
With Consumers:			
TOTAL:	6988	(b)(4); (b)(3):CPSA Section 6(a)	
(b)(4); (b)(3):CPSA Section 6(a)			
II) INCIDENT UPDATE			
	Total incidents Reported this Period that Occurred <u>Before</u> the Recall	Total Incidents Reported this Period that Occurred <u>After</u> the Recall	
Incidents	(b)(4); (b)(3):CPSA Section 6(a)		
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Email:	#	_____	
Regular Mail:	#	_____	
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Phone:	#	(b)(4); (b)(3):CPSA Section 6(a)	
Email:	#	_____	
Regular Mail:	#	_____	
Registration Cards:	#	_____	
Is the recall currently posted on your homepage? YES ___ If no, explain: _____			
How many website hits did your Firm have this reporting period for this recall? # (b)(4); (b)(3):CPSA			
As applicable under your CAP, how many times in this reporting period did your Firm post the recall notice on the following:			
Facebook:	#	# of shares:	# of Likes: _____
Twitter:	#	# of Re-Tweets:	# of Twitter Followers: (b)(4); (b)(3):CPSA
Other:	#	Explain: _____	
Ad Placements:	#	Explain: _____	
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Updated 10/2015

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(4) ; (b)(3):CPSA Section 6(a)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(4) ; (b)(3):CPSA Section 6(a)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(4) ; (b)(3):CPSA Section 6(a)

of the Freedom of Information Act

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of the Freedom of Information Act

Withheld pursuant to exemption

(b)(4) ; (b)(3):CPSA Section 6(a)

of the Freedom of Information Act

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of the Freedom of Information Act

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(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

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of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

From: [Production Server](#)
Subject: New Task: Indicate Package E-Mailed - RP190048 - CAP - Accept CAP Letter (X) (7900)
Date: Friday, February 22, 2019 2:46:02 PM

This message has been sent by Appian

Indicate Package E-Mailed - RP190048 - CAP - Accept CAP Letter (X) (7900)

This task was assigned to you on Feb 22, 2019 2:45 PM EST
The task priority is Normal

To view the task, please [follow this link](#)

From: alerts@apps.cpsc.gov on behalf of [Sheela Kadambi](#)
To: [Kadambi, Sheela](#)
Subject: RP190048 - L8X Letter Approved
Date: Friday, February 22, 2019 2:34:20 PM

L8X Letter has been approved by Sheela Kadambi; Shawn Cerruti; Joseph Williams;
Matthew Lee

From: [Kadambi, Sheela](#)
To: [Cerruti, Shawn](#)
Subject: RE: Telework agenda
Date: Friday, February 22, 2019 10:23:37 AM
Attachments: [RP190048 - Accept CAP Form.docx](#)
[RP190048 - Accept CAP Letter \(X\).docx](#)

[Here you go](#)

From: Cerruti, Shawn
Sent: Friday, February 22, 2019 10:19 AM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: RE: Telework agenda

(b)(5)

Best Regards,
Shawn M. Cerruti
Acting Supervisor
Fast Track Program
U.S. Consumer Product Safety Commission
Office of Compliance
4330 East-West Highway, 6th Floor
Bethesda, MD 20814
T: (301) 504-6811
E: scerruti@cpsc.gov
Fast Track Information: www.cpsc.gov/fasttrack
Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Kadambi, Sheela
Sent: Friday, February 22, 2019 9:50 AM
To: Cerruti, Shawn <scerruti@cpsc.gov>
Subject: RE: Telework agenda

(b)(5)

Regards
Sheela

Sheela Kadambi

Compliance officer
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
301-504-7561
skadambi@cpsc.gov

From: Cerruti, Shawn
Sent: Friday, February 22, 2019 9:43 AM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: RE: Telework agenda

Sheela,

(b)(5)

Best Regards,
Shawn M. Cerruti
Acting Supervisor
Fast Track Program
U.S. Consumer Product Safety Commission
Office of Compliance
4330 East-West Highway, 6th Floor
Bethesda, MD 20814
T: (301) 504-6811
E: scerruti@cpsc.gov
Fast Track Information: www.cpsc.gov/fasttrack
Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Kadambi, Sheela
Sent: Friday, February 22, 2019 8:48 AM
To: Cerruti, Shawn <scerruti@cpsc.gov>

Subject: RE: Telework agenda

(b)(5)

Regards

Sheela Kadambi

Compliance officer

Office of Compliance and Field Operations

U.S. Consumer Product Safety Commission

4330 East West Highway

Bethesda, MD 20814

301-504-7561

skadambi@cpsc.gov

From: Cerruti, Shawn

Sent: Friday, February 22, 2019 8:34 AM

To: Kadambi, Sheela <SKadambi@cpsc.gov>

Subject: RE: Telework agenda

Sheela,

(b)(5)

Best Regards,

Shawn M. Cerruti

Acting Supervisor

Fast Track Program

U.S. Consumer Product Safety Commission

Office of Compliance

4330 East-West Highway, 6th Floor

Bethesda, MD 20814

T: (301) 504-6811

E: scerruti@cpsc.gov

Fast Track Information: www.cpsc.gov/fasttrack

Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Kadambi, Sheela

Sent: Friday, February 22, 2019 7:21 AM

To: Cerruti, Shawn <scerruti@cpsc.gov>

Subject: RE: Telework agenda

(b)(5)

Regards

Sheela Kadambi

Compliance officer

Office of Compliance and Field Operations

U.S. Consumer Product Safety Commission

4330 East West Highway

Bethesda, MD 20814

301-504-7561

skadambi@cpsc.gov

From: Cerruti, Shawn

Sent: Thursday, February 21, 2019 6:18 PM

To: Kadambi, Sheela <SKadambi@cpsc.gov>

Subject: RE: Telework agenda

(b)(5)

Best Regards,

Shawn M. Cerruti

Acting Supervisor

Fast Track Program

U.S. Consumer Product Safety Commission

Office of Compliance

4330 East-West Highway, 6th Floor

Bethesda, MD 20814

T: (301) 504-6811

E: scerruti@cpsc.gov

Fast Track Information: www.cpsc.gov/fasttrack

Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Kadambi, Sheela

Sent: Thursday, February 21, 2019 4:37 PM

To: Cerruti, Shawn <scerruti@cpsc.gov>

Subject: Telework agenda

Hi Shawn,

(b)(5)



Regards

Sheela

Sheela Kadambi

Compliance officer

Office of Compliance and Field Operations

U.S. Consumer Product Safety Commission

4330 East West Highway

Bethesda, MD 20814

301-504-7561

skadambi@cpsc.gov

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(b)(5)

of the Freedom of Information Act

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(b)(5)

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of the Freedom of Information Act

Withheld pursuant to exemption

(b)(5)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

From: [Kadambi, Sheela](#)
To: [Sanders, Tangila](#)
Subject: RE: Please post
Date: Friday, February 22, 2019 8:13:04 AM

Good morning Tangi,

Here is the link for the SRAM: <http://www.healthycanadians.gc.ca/recall-alert-rappel-avis/hc-sc/2019/68862r-eng.php> . Thanks much for your help.

Regards

Sheela

Sheela Kadambi

Compliance officer
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
301-504-7561
skadambi@cpsc.gov

From: Sanders, Tangila
Sent: Thursday, February 21, 2019 4:17 PM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: RE: Please post

Perfect! I will make the update immediately upon receipt. Thank you for patience as I manually process your recall.

Tangi

Tangila N. Sanders
Web Content Manager
U.S. Consumer Product Safety Commission
Tsanders@cpsc.gov
301-504-7410

From: Kadambi, Sheela
Sent: Thursday, February 21, 2019 4:15 PM
To: Sanders, Tangila <Tsanders@cpsc.gov>
Subject: RE: Please post

Thank you Tangi,

I will forward this to the Firm's attorney.

Regards

Sheela

Sheela Kadambi

Compliance officer

Office of Compliance and Field Operations

U.S. Consumer Product Safety Commission

4330 East West Highway

Bethesda, MD 20814

301-504-7561

skadambi@cpsc.gov

From: Sanders, Tangila

Sent: Thursday, February 21, 2019 4:08 PM

To: Fleischer, Janis <JFleischer@cpsc.gov>; Web Team Members <listWebTeam@cpsc.gov>

Cc: Gray, Eric <EGray@cpsc.gov>; Fleming, Nychelle <NFleming@cpsc.gov>; Kadambi, Sheela <SKadambi@cpsc.gov>; Galbo, Joseph <JGalbo@cpsc.gov>

Subject: RE: Please post

The link is live please review: <https://www.cpsc.gov/Recalls/2019/sram-recalls-bicycle-gear-hubs-due-to-crash-and-injury-hazards>

Tangi

Tangila N. Sanders

Web Content Manager

U.S. Consumer Product Safety Commission

Tsanders@cpsc.gov

301-504-7410

From: Fleischer, Janis

Sent: Thursday, February 21, 2019 3:20 PM

To: Web Team Members <listWebTeam@cpsc.gov>

Cc: Gray, Eric <EGray@cpsc.gov>; Fleming, Nychelle <NFleming@cpsc.gov>; Kadambi, Sheela <SKadambi@cpsc.gov>

Subject: Please post

Webteam,

Please post the attached releases today, February 21, 2019:

3:30 – SRAM (please make sure date is today, February 21, it went through drupal as Feb 20)

3:45 – Not Responsive

Thank you,
Janis

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

From: [Fleischer, Janis](#)
To: [Outgoing Communication](#)
Subject: Outgoing Communication/Do Not Distribute
Date: Thursday, February 21, 2019 4:18:21 PM
Attachments: [19069.docx](#)
[Not Responsive](#)

The attached press releases will be posted today, February 21, 2019:

SRAM Recalls Bicycle Gear Hubs Due to Crash and Injury Hazards (19-069)

Not Responsive



U.S. Consumer Product Safety Commission – Fast Track Recall

NOTE: This recall was previously announced independently on 1/17/2019 by the firm due to the government furlough.

Recall Date: February 21, 2019

Recall Number: 19-069

SRAM Recalls Bicycle Gear Hubs Due to Crash and Injury Hazards

Recall Summary

Name of Product: SRAM i-Motion 3 internal gear hubs (coaster brake version) for bicycles

Hazard: The brakes in the gear hubs can fail, posing crash and injury hazards to the rider.

Remedy: Refund

Consumers should immediately stop using bicycles with the recalled gear hubs and contact SRAM for instructions on how to receive a partial refund.

Consumer Contact:

SRAM at 800-346-2928 from 10 a.m. to 7 p.m. ET Monday through Thursday and 10 a.m. to 6 p.m. ET on Friday or online at www.sram.com or www.zipp.com and click on “Recall Notice” for more information

Recall Details

Units: About 7,000 (in addition, 700 were sold in Canada)

Description:

This recall involves SRAM® i-Motion 3 three-speed internal gear hubs with a coaster brake installed on bicycles with no redundant braking system. The recalled hubs were sold on the following Electra® model bicycles: Electra Cruiser Custom 3i, Electra Coaster 3i, Electra

Hawaii 3i, Electra Hawaii 3i 24 and Electra Straight 8. The recalled hubs were also sold as aftermarket parts for other bicycles. The recalled hubs have “SRAM i-Motion 3” printed on the hub shell and a brake arm extending from the axle of the hub.

Incidents/Injuries: SRAM has received five reports of brake failure, resulting in one minor injury to a rider.

Sold At: Specialty bicycle retailers nationwide from April 2010 through December 2018 for between \$400 and \$800 for Electra bicycles equipped with the recalled hubs and for about \$90 for the recalled aftermarket gear hubs

Distributor: SRAM LLC, of Chicago, Ill.

Manufacturer: Heng Ying Machinery Co., Ltd. of Taoyuan City, Taiwan

Manufactured in: Taiwan

Photos



Photo 1: Recalled SRAM i-Motion 3 hub



Photo 2: Location of brake arm on recalled SRAM i-Motion 3 hub

Footer



This recall was conducted voluntarily by the company under CPSC's Fast Track Recall process. Fast Track recalls are initiated by firms, who commit to work with CPSC to quickly announce the recall and remedy to protect consumers.

About U.S. CPSC:

The U.S. Consumer Product Safety Commission is charged with protecting the public from unreasonable risks of injury or death associated with the use of thousands of types of consumer products under the agency's jurisdiction. Deaths, injuries, and property damage from consumer product incidents cost the nation more than \$1 trillion annually. CPSC is committed to protecting consumers and families from products that pose a fire, electrical, chemical or mechanical hazard. CPSC's work to ensure the safety of consumer products - such as toys, cribs, power tools, cigarette lighters and household chemicals – contributed to a decline in the rate of deaths and injuries associated with consumer products over the past 40 years.

Federal law bars any person from selling products subject to a publicly-announced voluntary recall by a manufacturer or a mandatory recall ordered by the Commission.

For more lifesaving information, follow us on [Facebook](#), Instagram [@USCPSC](#) and Twitter [@USCPSC](#) or sign up to receive our [e-mail](#) alerts. To report a dangerous product or a product-related injury go online to

www.SaferProducts.gov or call CPSC's Hotline at 800-638-2772 or teletypewriter at 301-595-7054 for the hearing impaired.

CPSC Consumer Information Hotline

Contact us at this toll-free number if you have questions about a recall:

800-638-2772 (TTY 301-595-7054)

Times: 8 a.m. – 5:30 p.m. ET; Messages can be left anytime

Call to get product safety and other agency information and to [report unsafe products](#).

Media Contact

Please use the phone numbers below for all media requests.

Phone: 301-504-7908

Spanish: 301-504-7800

Withheld pursuant to exemption

Not Responsive

of the Freedom of Information Act

Withheld pursuant to exemption

Not Responsive

of the Freedom of Information Act

Withheld pursuant to exemption

Not Responsive

of the Freedom of Information Act

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(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act



U.S. Consumer Product Safety Commission – Fast Track Recall

NOTE: This recall was previously announced independently on 1/17/2019 by the firm due to the government furlough.

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Recall Number: 19-069

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Consumers should immediately stop using bicycles with the recalled gear hubs and contact SRAM for instructions on how to receive a partial refund.

Consumer Contact:

SRAM at 800-346-2928 from 10 a.m. to 7 p.m. ET Monday through Thursday and 10 a.m. to 6 p.m. ET on Friday or online at www.sram.com or www.zipp.com and click on “Recall Notice” for more information

Recall Details

Units: About 7,000 (in addition, 700 were sold in Canada)

Description:

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aftermarket parts for other bicycles. The recalled hubs have “SRAM i-Motion 3” printed on the hub shell and a brake arm extending from the axle of the hub.

Incidents/Injuries: SRAM has received five reports of brake failure, resulting in one minor injury to a rider.

Sold At: Specialty bicycle retailers nationwide from April 2010 through December 2018 for between \$400 and \$800 for Electra bicycles equipped with the recalled hubs and for about \$90 for the recalled aftermarket gear hubs

Distributor: SRAM LLC, of Chicago, Ill.

Manufacturer: Heng Ying Machinery Co., Ltd. of Taoyuan City, Taiwan

Manufactured in: Taiwan

Photos



Photo 1: Recalled SRAM i-Motion 3 hub



Photo 2: Location of brake arm on recalled SRAM i-Motion 3 hub

Footer



This recall was conducted voluntarily by the company under CPSC's Fast Track Recall process. Fast Track recalls are initiated by firms, who commit to work with CPSC to quickly announce the recall and remedy to protect consumers.

About U.S. CPSC:

The U.S. Consumer Product Safety Commission is charged with protecting the public from unreasonable risks of injury or death associated with the use of thousands of types of consumer products under the agency's jurisdiction. Deaths, injuries, and property damage from consumer product incidents cost the nation more than \$1 trillion annually. CPSC is committed to protecting consumers and families from products that pose a fire, electrical, chemical or mechanical hazard. CPSC's work to ensure the safety of consumer products - such as toys, cribs, power tools, cigarette lighters and household chemicals – contributed to a decline in the rate of deaths and injuries associated with consumer products over the past 40 years.

Federal law bars any person from selling products subject to a publicly-announced voluntary recall by a manufacturer or a mandatory recall ordered by the Commission.

For more lifesaving information, follow us on [Facebook](#), Instagram [@USCPSC](#) and Twitter [@USCPSC](#) or sign up to receive our [e-mail](#) alerts. To report a dangerous product or a product-related injury go online to

www.SaferProducts.gov or call CPSC's Hotline at 800-638-2772 or teletypewriter at 301-595-7054 for the hearing impaired.

CPSC Consumer Information Hotline

Contact us at this toll-free number if you have questions about a recall:

800-638-2772 (TTY 301-595-7054)

Times: 8 a.m. – 5:30 p.m. ET; Messages can be left anytime

Call to get product safety and other agency information and to [report unsafe products](#).

Media Contact

Please use the phone numbers below for all media requests.

Phone: 301-504-7908

Spanish: 301-504-7800

From: [Kadambi, Sheela](#)
To: [McCune, Renee](#)
Subject: (b)(3):CPSA Section 6(b)(1)
Date: Thursday, February 21, 2019 11:20:24 AM

Thank you ---

From: McCune, Renee
Sent: Thursday, February 21, 2019 11:20 AM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: (b)(3):CPSA Section 6(b)(1)

(b)(5)

From: Kadambi, Sheela
Sent: Thursday, February 21, 2019 11:17 AM
To: McCune, Renee <RMcCune@cpsc.gov>
Subject: (b)(3):CPSA Section 6(b)(1)

[Renee,](#)

(b)(5)

[Sheela](#)

From: McCune, Renee
Sent: Thursday, February 21, 2019 11:09 AM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: (b)(3):CPSA Section 6(b)(1)

(b)(5)

Renee

From: Kadambi, Sheela
Sent: Thursday, February 21, 2019 11:03 AM
To: McCune, Renee <RMcCune@cpsc.gov>
Subject: (b)(3):CPSA Section 6(b)(1)

[Hi Renee,](#)

(b)(5)

[Regards](#)
[Sheela](#)

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

From: [Kadambi, Sheela](#)
To: [Lee, Matthew](#)
Subject: (b)(3):CPSA Section 6(b)(1)
Date: Thursday, February 21, 2019 9:33:32 AM

Hi Matt,

(b)(5)

Regards

Sheela

Sheela Kadambi

Compliance officer

Office of Compliance and Field Operations

U.S. Consumer Product Safety Commission

4330 East West Highway

Bethesda, MD 20814

301-504-7561

skadambi@cpsc.gov

From: [Kadambi, Sheela](#)
To: [Hampshire, Melissa](#)
Subject: (b)(3):CPSA Section 6(b)(1)
Date: Thursday, February 21, 2019 8:58:50 AM

(b)(5)

Regards
Sheela
Sheela Kadambi
Compliance officer
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
301-504-7561
skadambi@cpsc.gov

From: Hampshire, Melissa
Sent: Thursday, February 21, 2019 8:51 AM
To: McCune, Renee <RMcCune@cpsc.gov>; Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: (b)(3):CPSA Section 6(b)(1)

(b)(5)

From: Kadambi, Sheela
Sent: Thursday, February 21, 2019 7:20 AM
To: Hampshire, Melissa <MHampshire@cpsc.gov>
Cc: Cerruti, Shawn <scerruti@cpsc.gov>
Subject: (b)(3):CPSA Section 6(b)(1)

Good morning Melissa,

(b)(5)

Regards

Sheela

Sheela Kadambi

Compliance officer

Office of Compliance and Field Operations

U.S. Consumer Product Safety Commission

4330 East West Highway

Bethesda, MD 20814

301-504-7561

skadambi@cpsc.gov

From: [Kadambi, Sheela](#)
To: [Davis, Patty](#)
Cc: [Cerruti, Shawn](#)
Subject: RE: SRAM PR
Date: Wednesday, February 20, 2019 3:18:11 PM
Attachments: [SRAM Recalls Bicycle Gear Hubs Due to Crash .msg](#)

Hi Patti,

(b)(5)

Regards
Sheela
Sheela Kadambi
Compliance officer
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
301-504-7561
skadambi@cpsc.gov

From: Davis, Patty
Sent: Wednesday, February 20, 2019 2:14 PM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: RE: SRAM PR

(b)(5)

From: Kadambi, Sheela
Sent: Tuesday, February 19, 2019 3:31 PM
To: Davis, Patty <PDavis@cpsc.gov>
Subject: SRAM PR

Patti,

(b)(5)

Regards
Sheela
Sheela Kadambi
Compliance officer

Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
301-504-7561
skadambi@cpsc.gov

From: [Kadambi, Sheela](#)
To: [Cerruti, Shawn](#)
Subject: (b)(3):CPSA Section 6(b)(1)
Date: Wednesday, February 20, 2019 11:41:40 AM

FYI

From: Kadambi, Sheela
Sent: Wednesday, February 20, 2019 8:31 AM
To: Hampshire, Melissa <MHampshire@cpsc.gov>
Subject: (b)(3):CPSA Section 6(b)(1)

Good morning Melissa,

(b)(5)

Sheela
Sheela Kadambi
Compliance officer
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
301-504-7561
skadambi@cpsc.gov

From: [Kadambi, Sheela](#)
To: [Cerruti, Shawn](#)
Subject: SRAM PR in SharePoint
Date: Wednesday, February 20, 2019 11:41:00 AM
Attachments: [SnipImage.JPG](#)

FYI

Withheld pursuant to exemption

(b)(5)

of the Freedom of Information Act

From: [Kadambi, Sheela](#)
To: [Davis, Patty](#)
Subject: RE: SRAM PR
Date: Tuesday, February 19, 2019 3:52:39 PM

Thank you ☺

From: Davis, Patty
Sent: Tuesday, February 19, 2019 3:34 PM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: RE: SRAM PR

(b)(5)

From: Kadambi, Sheela
Sent: Tuesday, February 19, 2019 3:31 PM
To: Davis, Patty <PDavis@cpsc.gov>
Subject: SRAM PR

Patti,

(b)(5)

Regards
Sheela
Sheela Kadambi
Compliance officer
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
301-504-7561
skadambi@cpsc.gov

From: [Kadambi, Sheela](#)
To: [Galbo, Joseph](#)
Subject: RE: social media approval - SRAM gear hubs
Date: Tuesday, February 19, 2019 11:09:46 AM

(b)(5)

Regards
Sheela
Sheela Kadambi
Compliance officer
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
301-504-7561
skadambi@cpsc.gov

From: Galbo, Joseph
Sent: Tuesday, February 19, 2019 9:46 AM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: RE: social media approval - SRAM gear hubs

Hey Sheela,

(b)(5)

Joe

From: Kadambi, Sheela
Sent: Tuesday, February 19, 2019 7:08 AM
To: Galbo, Joseph <JGalbo@cpsc.gov>
Subject: FW: social media approval - SRAM gear hubs

Good morning Joe,

(b)(5)

Regards
Sheela
Sheela Kadambi

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

From: [Press Release Tracking](#)
To: [Kadambi, Sheela](#)
Cc: [Latkowski, Liliانا](#); [Lee, Matthew](#)
Subject: Product Recall (Approval Workflow) started on SRAM Recalls Bicycle Gear Hubs .
Date: Thursday, February 14, 2019 3:26:57 PM

Product Recall (Approval Workflow) has started on [SRAM Recalls Bicycle Gear Hubs](#).

Participants are Cerruti, Shawn;Rose, Blake;Lee, Matthew
Due by None

Each person will receive a task to approve [SRAM Recalls Bicycle Gear Hubs](#). The tasks will be assigned one at a time for participants shown above.

[View the status of this workflow.](#)

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

From: [Press Release Tracking](#)
To: [Kadambi, Sheela](#)
Subject: Product Recall (Approval Workflow) has completed on SRAM Recalls Bicycle Gear Hubs .
Date: Thursday, February 14, 2019 3:22:50 PM

Product Recall (Approval Workflow) has completed on [SRAM Recalls Bicycle Gear Hubs](#).

Product Recall (Approval Workflow) on SRAM Recalls Bicycle Gear Hubs has ended because Kadambi, Sheela has canceled the workflow.

[View the workflow history.](#)

From: [Klinefelter, Elizabeth](#)
To: [Kadambi, Sheela](#)
Cc: [Galbo, Joseph](#); [Fleming, Nychelle](#)
Subject: social media approval - SRAM gear hubs
Date: Thursday, February 14, 2019 3:04:13 PM

(b)(5)



Thanks,
Elizabeth

Elizabeth Klinefelter
Public Affairs Specialist
Office of Communications
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
301-504-7508
eklinefelter@cpsc.gov

CPSC is on [Facebook](#), [Instagram](#) and [Twitter](#)!

From: [Klinefelter, Elizabeth](#)
To: [Kadambi, Sheela](#)
Subject: RE: RP190048 SRAM LLC - 3-speed coaster brake
Date: Thursday, February 14, 2019 2:49:24 PM
Attachments: [SRAM gear hubs DFC.doc](#)

Thank you. The updated DFC is attached.

From: Kadambi, Sheela
Sent: Thursday, February 14, 2019 2:27 PM
To: Klinefelter, Elizabeth <EKlinefelter@cpsc.gov>
Subject: RE: RP190048 SRAM LLC - 3-speed coaster brake

(b)(5)

[Sheela](#)

From: Klinefelter, Elizabeth
Sent: Thursday, February 14, 2019 2:02 PM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: RE: RP190048 SRAM LLC - 3-speed coaster brake

(b)(5)

Thanks,
Elizabeth

From: Kadambi, Sheela
Sent: Thursday, February 14, 2019 1:05 PM
To: Klinefelter, Elizabeth <EKlinefelter@cpsc.gov>
Subject: RP190048 SRAM LLC - 3-speed coaster brake

Hi Elizabeth,

(b)(5)

Regards
Sheela
Sheela Kadambi
Compliance officer
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814

301-504-7561

skadambi@cpsc.gov



U.S. Consumer Product Safety Commission – Fast Track Recall with Health Canada

NOTE: This recall was previously announced independently on 1/17/19 by the firm due to the government furlough.

Release Date: February 20, 2019

Release Number: 19-DRAFT FOR CLEARANCE

SRAM Recalls Bicycle Gear Hubs Due to Crash and Injury Hazards

Recall Summary

Name of Product: SRAM i-Motion 3 internal gear hubs (coaster brake version) for bicycles

Hazard: The brakes in the gear hubs can fail, posing crash and injury hazards to the rider.

Remedy: Refund

Consumers should immediately stop using bicycles with the recalled gear hubs and contact SRAM for instructions on how to receive a partial refund.

Consumer Contact: SRAM at 800-346-2928 from 10 a.m. to 7 p.m. ET Monday through Thursday and 10 a.m. to 6 p.m. ET on Friday or online at www.sram.com or www.zipp.com and click on “Recall Notice” for more information.

Recall Details

Units: About 7,000 (in addition, 700 were sold in Canada)

Description: This recall involves SRAM® i-Motion 3 three-speed internal gear hubs with a coaster brake installed on bicycles with no redundant braking system. The recalled hubs were sold on the following Electra® model bicycles: Electra Cruiser Custom 3i, Electra Coaster 3i, Electra Hawaii 3i, Electra Hawaii 3i 24 and Electra Straight 8. The recalled hubs were also sold as aftermarket parts for other bicycles. The recalled hubs have “SRAM i-Motion 3” printed on the hub shell and a brake arm extending from the axle of the hub.

Incidents/Injuries: SRAM has received five reports of brake failure, resulting in one minor injury to a rider.

Sold at: Specialty bicycle retailers nationwide from April 2010 through June 2017 for between \$400 and \$800 for Electra bicycles equipped with the recalled hubs and for about \$90 for the recalled aftermarket gear hubs.

Distributor: SRAM LLC, of Chicago, Ill.

Manufacturer: Heng Ying Machinery Co., Ltd. of Taoyuan City, Taiwan

Manufactured in: Taiwan

In Conjunction With: Canada

Note: Health Canada's press release is available at:

Photos



Photo 1: Recalled SRAM i-Motion 3 hub



Photo 2: Location of brake arm on recalled SRAM i-Motion 3 hub



This recall was conducted voluntarily by the company under CPSC's Fast Track Recall process. Fast Track recalls are initiated by firms who commit to work with CPSC to quickly announce the recall and remedy to protect consumers.

About U.S. CPSC:

The U.S. Consumer Product Safety Commission is charged with protecting the public from unreasonable risks of injury or death associated with the use of thousands of types of consumer products under the agency's jurisdiction. Deaths, injuries, and property damage from consumer product incidents cost the nation more than \$1 trillion annually. CPSC is committed to protecting consumers and families from products that pose a fire, electrical, chemical or mechanical hazard. CPSC's work to ensure the safety of consumer products - such as toys, cribs, power tools, cigarette lighters and household chemicals – contributed to a decline in the rate of deaths and injuries associated with consumer products over the past 40 years.

Federal law bars any person from selling products subject to a publicly-announced voluntary recall by a manufacturer or a mandatory recall ordered by the Commission.

For more lifesaving information, follow us on [Facebook](#), Instagram [@USCPSC](#) and Twitter [@USCPSC](#) or sign up to receive our [e-mail](#) alerts. To report a dangerous product or a product-related injury go online to [www.SaferProducts.gov](#) or call CPSC's Hotline at 800-638-2772 or teletypewriter at 301-595-7054 for the hearing impaired.

CPSC Consumer Information Hotline

Contact us at this toll-free number if you have questions about a recall:
800-638-2772 (TTY 301-595-7054)

Times: 8 a.m. – 5:30 p.m. ET; Messages can be left anytime

Call to get product safety and other agency information and to [report unsafe products](#).

Media Contact

Please use the phone numbers below for all media requests.

Phone: 301-504-7908

Spanish: 301-504-7800

From: [Klinefelter, Elizabeth](#)
To: [Kadambi, Sheela](#)
Subject: RE: RP190048 SRAM LLC - 3-speed coaster brake
Date: Thursday, February 14, 2019 2:02:03 PM
Attachments: [SRAM gear hubs DFC.doc](#)

(b)(5)

Thanks,
Elizabeth

From: Kadambi, Sheela
Sent: Thursday, February 14, 2019 1:05 PM
To: Klinefelter, Elizabeth <EKlinefelter@cpsc.gov>
Subject: RP190048 SRAM LLC - 3-speed coaster brake

Hi Elizabeth,

(b)(5)

Regards
Sheela
Sheela Kadambi
Compliance officer
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
301-504-7561
skadambi@cpsc.gov

Withheld pursuant to exemption

(b)(5)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(5)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(5)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

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of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

From: [Cerruti, Shawn](#)
To: [Kadambi, Sheela](#)
Subject: RE: SRAM release
Date: Thursday, February 14, 2019 11:26:42 AM

(b)(5)

Best Regards,

Shawn M. Cerruti

Acting Supervisor

Fast Track Program

U.S. Consumer Product Safety Commission

Office of Compliance

4330 East-West Highway, 6th Floor

Bethesda, MD 20814

T: (301) 504-6811

E: scerruti@cpsc.gov

Fast Track Information: www.cpsc.gov/fasttrack

Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Kadambi, Sheela
Sent: Thursday, February 14, 2019 11:26 AM
To: Cerruti, Shawn <scerruti@cpsc.gov>
Subject: RE: SRAM release

(b)(5)

From: Cerruti, Shawn
Sent: Thursday, February 14, 2019 11:25 AM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Cc: Klinefelter, Elizabeth <EKlinefelter@cpsc.gov>
Subject: FW: SRAM release

(b)(5)

Best Regards,

Shawn M. Cerruti

Acting Supervisor

Fast Track Program

U.S. Consumer Product Safety Commission

Office of Compliance

4330 East-West Highway, 6th Floor

Bethesda, MD 20814

T: (301) 504-6811

E: scerruti@cpsc.gov

Fast Track Information: www.cpsc.gov/fasttrack

Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Klinefelter, Elizabeth

Sent: Thursday, February 14, 2019 11:24 AM

To: Cerruti, Shawn <scerruti@cpsc.gov>

Subject: FW: SRAM release

From: Klinefelter, Elizabeth

Sent: Thursday, February 14, 2019 11:20 AM

To: Fleming, Nychelle <NFleming@cpsc.gov>; Kadambi, Sheela <SKadambi@cpsc.gov>

Cc: Davis, Patty <PDavis@cpsc.gov>

Subject: RE: SRAM release

(b)(5)

Thanks,
Elizabeth

From: Fleming, Nychelle

Sent: Wednesday, February 13, 2019 10:58 AM

To: Kadambi, Sheela <SKadambi@cpsc.gov>

Cc: Klinefelter, Elizabeth <EKlinefelter@cpsc.gov>; Davis, Patty <PDavis@cpsc.gov>

Subject: RE: SRAM release

(b)(5)

Thx. Nikki

From: Kadambi, Sheela

Sent: Wednesday, February 13, 2019 10:56 AM

To: Fleming, Nychelle <NFleming@cpsc.gov>

Cc: Klinefelter, Elizabeth <EKlinefelter@cpsc.gov>; Davis, Patty <PDavis@cpsc.gov>

Subject: RE: SRAM release

(b)(5)

(b)(5)

Sheela

From: Fleming, Nychelle

Sent: Wednesday, February 13, 2019 10:52 AM

To: Kadambi, Sheela <SKadambi@cpsc.gov>

Cc: Klinefelter, Elizabeth <EKlinefelter@cpsc.gov>; Davis, Patty <PDavis@cpsc.gov>

Subject: SRAM release

Sheela,

(b)(5)

Thank you,

Nikki

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Withheld pursuant to exemption

(b)(5)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(5)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(5)

of the Freedom of Information Act

From: [Cerruti, Shawn](#)
To: [Kadambi, Sheela](#)
Subject: RE: RP190048 SRAM LLC - 3-speed coaster brake
Date: Thursday, February 14, 2019 10:52:02 AM

(b)(5)

Best Regards,

Shawn M. Cerruti

Acting Supervisor

Fast Track Program

U.S. Consumer Product Safety Commission

Office of Compliance

4330 East-West Highway, 6th Floor

Bethesda, MD 20814

T: (301) 504-6811

E: scerruti@cpsc.gov

Fast Track Information: www.cpsc.gov/fasttrack

Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Kadambi, Sheela
Sent: Thursday, February 14, 2019 10:40 AM
To: Cerruti, Shawn <scerruti@cpsc.gov>
Subject: RP190048 SRAM LLC - 3-speed coaster brake
Importance: High

Hi Shawn,

(b)(5)

(b)(5)

Regards

Sheela

Sheela Kadambi

Compliance officer

Office of Compliance and Field Operations

U.S. Consumer Product Safety Commission

4330 East West Highway

Bethesda, MD 20814

301-504-7561

skadambi@cpsc.gov

Withheld pursuant to exemption

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of the Freedom of Information Act

Withheld pursuant to exemption

(b)(5)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(5)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

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(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

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(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

From: [Klinefelter, Elizabeth](#)
To: [Kadambi, Sheela](#)
Subject: RE: RP190048 SRAM LLC - 3-speed coaster brake
Date: Wednesday, February 13, 2019 9:46:00 AM

(b)(5)

Thanks,
[Elizabeth](#)

From: Kadambi, Sheela
Sent: Wednesday, February 13, 2019 8:32 AM
To: Klinefelter, Elizabeth <EKlinefelter@cpsc.gov>
Subject: RE: RP190048 SRAM LLC - 3-speed coaster brake

(b)(5)

[Sheela](#)

From: Klinefelter, Elizabeth
Sent: Wednesday, February 13, 2019 8:20 AM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: RE: RP190048 SRAM LLC - 3-speed coaster brake

(b)(5)

Thanks,
[Elizabeth](#)

From: Kadambi, Sheela
Sent: Wednesday, February 13, 2019 8:18 AM
To: Klinefelter, Elizabeth <EKlinefelter@cpsc.gov>
Subject: RE: RP190048 SRAM LLC - 3-speed coaster brake

Hi Elizabeth,

(b)(5)

Sheela

From: Klinefelter, Elizabeth

Sent: Wednesday, February 13, 2019 8:16 AM

To: Kadambi, Sheela <SKadambi@cpsc.gov>

Subject: RE: RP190048 SRAM LLC - 3-speed coaster brake

(b)(5)

Thanks,
Elizabeth

From: Kadambi, Sheela

Sent: Wednesday, February 13, 2019 6:57 AM

To: Klinefelter, Elizabeth <EKlinefelter@cpsc.gov>

Subject: FW: RP190048 SRAM LLC - 3-speed coaster brake

Good morning Elizabeth,

(b)(5)

Thanks
Sheela

(b)(3):CPSA Section 6(b)(1)

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

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(b)(3):CPSA Section 6(b)(1)

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(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

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of the Freedom of Information Act

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of the Freedom of Information Act

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(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

From: [Klinefelter, Elizabeth](#)
To: [Kadambi, Sheela](#)
Subject: RE: SRAM gear hubs Press Release draft
Date: Tuesday, February 12, 2019 3:36:52 PM
Attachments: [SRAM gear hubs DFC.doc](#)

(b)(5)

Thanks,
Elizabeth

From: Kadambi, Sheela
Sent: Tuesday, February 12, 2019 1:31 PM
To: Klinefelter, Elizabeth <EKlinefelter@cpsc.gov>
Subject: SRAM gear hubs Press Release draft

(b)(5)

From: Klinefelter, Elizabeth
Sent: Tuesday, February 12, 2019 1:29 PM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: RE: SRAM gear hubs Press Release Firm draft 2-12-2019

(b)(5)

From: Kadambi, Sheela
Sent: Tuesday, February 12, 2019 1:16 PM
To: Klinefelter, Elizabeth <EKlinefelter@cpsc.gov>
Subject: FW: SRAM gear hubs Press Release Firm draft 2-12-2019

Hi Elizabeth,

(b)(5)

Sheela

From: Kadambi, Sheela
Sent: Tuesday, February 12, 2019 11:38 AM
To: Klinefelter, Elizabeth <EKlinefelter@cpsc.gov>
Subject: SRAM gear hubs Press Release Firm draft 2-12-2019

Hi Elizabeth,

(b)(5)

Sheela

Sheela Kadambi

Compliance officer

Office of Compliance and Field Operations

U.S. Consumer Product Safety Commission

4330 East West Highway

Bethesda, MD 20814

301-504-7561

skadambi@cpsc.gov

Withheld pursuant to exemption

(b)(5)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(5)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(5)

of the Freedom of Information Act

From: [Klinefelter, Elizabeth](#)
To: [Kadambi, Sheela](#)
Subject: RE: SRAM gear hubs Press Release draft
Date: Tuesday, February 12, 2019 1:55:54 PM

(b)(5)

From: Kadambi, Sheela
Sent: Tuesday, February 12, 2019 1:31 PM
To: Klinefelter, Elizabeth <EKlinefelter@cpsc.gov>
Subject: SRAM gear hubs Press Release draft

(b)(5)

From: Klinefelter, Elizabeth
Sent: Tuesday, February 12, 2019 1:29 PM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: RE: SRAM gear hubs Press Release Firm draft 2-12-2019

(b)(5)

From: Kadambi, Sheela
Sent: Tuesday, February 12, 2019 1:16 PM
To: Klinefelter, Elizabeth <EKlinefelter@cpsc.gov>
Subject: FW: SRAM gear hubs Press Release Firm draft 2-12-2019

Hi Elizabeth,

(b)(5)

Sheela

From: Kadambi, Sheela
Sent: Tuesday, February 12, 2019 11:38 AM
To: Klinefelter, Elizabeth <EKlinefelter@cpsc.gov>
Subject: SRAM gear hubs Press Release Firm draft 2-12-2019

Hi Elizabeth,

(b)(5)

Sheela
Sheela Kadambi
Compliance officer

Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
301-504-7561
skadambi@cpsc.gov

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(b)(3):CPSA Section 6(b)(1)

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(b)(3):CPSA Section 6(b)(1)

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Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

From: [Klinefelter, Elizabeth](#)
To: [Kadambi, Sheela](#)
Subject: RE: SRAM gear hubs Press Release Firm draft 2-12-2019
Date: Tuesday, February 12, 2019 12:32:20 PM
Attachments: [SRAM gear hubs v2.doc](#)

(b)(5)

Thanks for your help.
Elizabeth

From: Kadambi, Sheela
Sent: Tuesday, February 12, 2019 11:38 AM
To: Klinefelter, Elizabeth <EKlinefelter@cpsc.gov>
Subject: SRAM gear hubs Press Release Firm draft 2-12-2019

Hi Elizabeth,

(b)(5)

Sheela
Sheela Kadambi
Compliance officer
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
301-504-7561
skadambi@cpsc.gov

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(b)(5)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(5)

of the Freedom of Information Act

From: [Kadambi, Sheela](#)
To: [Klinefelter, Elizabeth](#)
Subject: SRAM gear hubs Press Release Firm draft 2-12-2019
Date: Tuesday, February 12, 2019 11:38:16 AM
Attachments: [SRAM gear hubs Press Release Firm draft 2-12-2019.doc](#)

Hi Elizabeth,

(b)(5)

Sheela

Sheela Kadambi

Compliance officer

Office of Compliance and Field Operations

U.S. Consumer Product Safety Commission

4330 East West Highway

Bethesda, MD 20814

301-504-7561

skadambi@cpsc.gov

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of the Freedom of Information Act

IMPORTANT SAFETY NOTICE

SRAM® i-Motion 3, three-speed internal gear hub



SRAM, LLC has determined that some of the SRAM i-Motion 3, three-speed internal gear hubs may have been manufactured with grease in the internal gear hub that can get sticky over time, especially if the bicycle or hub is not used for a long period of time and/or exposed to high temperatures. If the grease in the internal gear hub becomes sticky, the brake pawls in the hub can fail to engage correctly, resulting in the loss of braking power. You could crash or fall from the bicycle.

The affected hubs were installed on the following Electra® model bicycles: Electra Cruiser Custom 3i, Electra Coaster 3i, Electra Hawaii 3i, Electra Hawaii 3i 24" and Electra Straight 8. The affected hubs are readily identifiable by the text "SRAM i-Motion 3" on the hub shell. The affected hubs are also identifiable by the brake arm extending from the axle of the hub. The affected hubs were also sold in the aftermarket for installation on other bicycles.

Consumers with Electra bicycles or other bicycles equipped with potentially affected SRAM i-Motion 3 internal gear hubs and no redundant braking system should stop riding immediately and return their bicycle to SRAM for verification. SRAM will offer to repurchase the affected bicycle at a fair market, depreciated value, based on the Bicycle Blue Book (www.bicyclebluebook.com).

Call (800) 346-2928 from 10 a.m. to 7 p.m. Eastern Time, Monday through Thursday, or 10 a.m. to 6 p.m. Eastern Time, Friday with any questions.

This recall will be conducted in cooperation with the U.S. Consumer Product Safety Commission.

For more information, please go to our website: www.SRAM.com

Retailer: Please post until June 1, 2019

IMPORTANT

SAFETY RECALL NOTICE

Dear Electra®/SRAM® Customer:

You may have an Electra bicycle equipped with a SRAM i-Motion 3, three-speed internal gear hub with a coaster brake.

These hubs are the subject of a safety recall. If your Electra bicycle has a SRAM i-Motion 3 internal gear hub with a coaster brake (and no redundant braking system – i.e. no front brake), PLEASE STOP RIDING YOUR BIKE until you determine whether your hub is part of the recall.

Some of the affected hubs may have been manufactured with grease in the internal gear hub that can get sticky over time, especially if the bicycle or hub is not used for a long period of time and/or exposed to high temperatures. If the grease in the internal gear hub becomes sticky, the brake pawls in the hub can fail to engage correctly, resulting in the loss of braking power. You could crash or fall from the bicycle.

To determine if your hub is part of the recall, please check if your Electra bicycle is one of the following models: Electra Cruiser Custom 3i, Electra Coaster 3i, Electra Hawaii 3i, Electra Hawaii 3i 24", Electra Straight 8. If you have one of these Electra bicycles and it contains a SRAM i-Motion 3 with coaster brake (and no redundant braking system), please contact SRAM or your local bicycle dealer for verification.

The affected hubs are readily identifiable by the text "SRAM i-Motion 3" on the hub shell. The affected hubs are also identifiable by the brake arm extending from the axle of the hub.

Photo 1: SRAM i-Motion 3, three speed internal gear hub with coaster brake



If you have an affected hub, please contact SRAM or your local bicycle dealer. SRAM will offer to repurchase your bicycle at a fair market, depreciated value, based on the Bicycle Blue Book (www.bicyclebluebook.com). If you prefer to keep your bicycle, SRAM will assist your local bicycle dealer to identify a compatible new hub that you can request to be installed in place of the affected hub. You can apply some of the repurchase funds toward that new hub and the installation labor, and you can keep the remainder of the funds.

We apologize for this inconvenience, but your safety is our priority. For questions about this recall, call 800-346-2928 or check our website at www.sram.com. SRAM will conduct this recall in cooperation with U.S. Consumer Product Safety Commission.





VOLUNTARY SAFETY RECALL NOTICE

To: Electra®/SRAM® Dealers
Subject: SRAM® i-Motion 3 internal gear hub (coaster brake version)
From: SRAM, LLC
Date: January 18, 2019

To our valued dealers,

SRAM will work with the U.S. Consumer Product Safety Commission to announce a voluntary product recall of certain SRAM i-Motion 3, three-speed internal gear hubs with a coaster brake. SRAM has determined that some of the affected hubs may have been manufactured with grease in the internal gear hub that may become sticky thus causing the brake pawls in the hub to engage incorrectly, and result in the loss of braking power.

This presents a safety issue. As a result SRAM is recalling the hub on all Electra bicycles and hubs sold in the aftermarket that were installed on a bicycle with a coaster brake.

THIS ISSUE IS SAFETY RELATED. First, SRAM requests that you check your inventory to see whether you have any affected inventory of Electra bicycles or of aftermarket i-Motion 3 hubs. If you do, please quarantine the inventory and refrain from selling it to the public. In connection with the recall, SRAM will be advising consumers to stop using these products immediately. In the near future, we will be asking you to help us inform customers about the recall by posting a Safety Recall Poster in your store, which we will provide to you after coordination with U.S. Consumer Product Safety Commission. Failure of SRAM i-Motion 3 internal gear hubs, while in use, may result in loss of bicycle control and possible injury.

ISSUE

Some of the affected hubs may have been manufactured with grease in the internal gear hub that can get sticky over time, especially if the bicycle or hub is not used for a long period of time and/or exposed to high temperatures. If the grease in the internal gear hub becomes sticky, the brake pawls in the hub can fail to engage correctly, resulting in the loss of braking power. You could crash or fall from the bicycle.

CONSUMERS

SRAM will work with the U.S. Consumer Product Safety Commission to develop the materials to be used to notify consumers about this recall. We will advise you when this recall is going to be announced publicly to consumers. In the public announcement, we will be asking consumers owning one of these





products to stop riding immediately and return their bicycle to any SRAM dealer for verification of the product.

SRAM DEALER ACTION

Any dealer who has one or more new Electra bicycles with SRAM i-Motion 3 internal gear hubs installed (with no redundant braking system) can return the whole bicycle to their local SRAM DSD. SRAM will repurchase the bicycles at Dealer wholesale cost. For consumer-owned bicycles containing an affected hub, SRAM will repurchase the affected bicycle at a fair market, depreciated value, based on the Bicycle Blue Book (www.bicyclebluebook.com). Dealers are required to return the hub to SRAM with proof of value of the bicycle and in return SRAM will send the dealer a check for the value of the bicycle so they can reimburse the consumer. SRAM will reimburse dealers a flat \$50 for the labor costs. Recognizing that some consumers may prefer to keep their bicycles, SRAM will also develop and facilitate distribution of information for consumers and retailers about which aftermarket hub (or hubs) is compatible with the Electra bicycle, and will provide you with installation instructions for the compatible replacement hubs.

PRODUCT AFFECTED AND SERIAL NUMBERS

There is no serial number on the affected hubs. The affected hubs were installed on the following Electra model bicycles: Electra Cruiser Custom 3i, Electra Coaster 3i, Electra Hawaii 3i, Electra Hawaii 3i 24", and Electra Straight 8. The approximate retail sale of the Electra bicycles was from April 2010 to May 2018.

SRAM DEALER CUSTOMERS - PRODUCT IDENTIFICATION PROCEDURES

The UPC code of the hub is 710845662782. The UPC code does not appear on the hub. However, the affected hubs are readily identifiable by the text "SRAM i-Motion 3" on the hub shell. The affected hubs are also identifiable by the brake arm extending from the axle of the hub.

Photo 1: SRAM i-Motion 3 internal gear hub with a coaster brake



SRAM.



For further information, please contact your SRAM Customer Service or Technical Representative. SRAM regrets this inconvenience and appreciates the support of our dealers and service locations regarding this concern.

Thank you,

SRAM, LLC

SRAM.



Avid.

TRUVATIV

ZIP

QUARK

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(b)(3):CPSA Section 6(b)(1)

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of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

From: [Kadambi, Sheela](#)
To: [Cerruti, Shawn](#)
Subject: RE: RP190048 SRAM LLC - 3-speed coaster brake
Date: Wednesday, February 06, 2019 1:02:51 PM

(b)(5)

From: Cerruti, Shawn
Sent: Wednesday, February 06, 2019 11:19 AM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: RE: RP190048 SRAM LLC - 3-speed coaster brake

(b)(5)

Best Regards,
Shawn M. Cerruti
Acting Supervisor
Fast Track Program
U.S. Consumer Product Safety Commission
Office of Compliance
4330 East-West Highway, 6th Floor
Bethesda, MD 20814
T: (301) 504-6811
E: scerruti@cpsc.gov
Fast Track Information: www.cpsc.gov/fasttrack
Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Kadambi, Sheela
Sent: Wednesday, February 06, 2019 10:57 AM
To: Cerruti, Shawn <scerruti@cpsc.gov>
Subject: FW: RP190048 SRAM LLC - 3-speed coaster brake

FYI

(b)(3):CPSA Section 6(b)(1)

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of the Freedom of Information Act

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of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

From: [Klinefelter, Elizabeth](#)
To: [Kadambi, Sheela](#)
Subject: RE: RP190048 SRAM LLC - 3-speed coaster brake
Date: Tuesday, February 05, 2019 9:35:20 AM
Attachments: [SRAM gear hubs v1.doc](#)

(b)(5)

Thanks,
Elizabeth

From: Kadambi, Sheela
Sent: Tuesday, February 05, 2019 7:42 AM
To: Klinefelter, Elizabeth <EKlinefelter@cpsc.gov>
Subject: RE: RP190048 SRAM LLC - 3-speed coaster brake

[Good morning Elizabeth,](#)

(b)(5)

[Sheela](#)

From: Klinefelter, Elizabeth
Sent: Monday, February 04, 2019 5:00 PM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: RE: RP190048 SRAM LLC - 3-speed coaster brake

(b)(5)

From: Kadambi, Sheela
Sent: Monday, February 04, 2019 4:06 PM
To: Coolman, Carla <CCoolman@cpsc.gov>; Klinefelter, Elizabeth <EKlinefelter@cpsc.gov>
Subject: RP190048 SRAM LLC - 3-speed coaster brake

Hi Elizabeth,

(b)(5)

Thanks
Sheela
Sheela Kadambi
Compliance officer
Office of Compliance and Field Operations

U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
301-504-7561
skadambi@cpsc.gov

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of the Freedom of Information Act

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(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

From: [Cerruti, Shawn](#)
To: [Kadambi, Sheela](#)
Subject: RE: RP190048, SRAM Brakes
Date: Wednesday, January 30, 2019 4:44:20 PM

(b)(5)

Best Regards,
Shawn M. Cerruti
Acting Supervisor
Fast Track Program
U.S. Consumer Product Safety Commission
Office of Compliance
4330 East-West Highway, 6th Floor
Bethesda, MD 20814
T: (301) 504-6811
E: scerruti@cpsc.gov
Fast Track Information: www.cpsc.gov/fasttrack
Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Kadambi, Sheela
Sent: Wednesday, January 30, 2019 4:13 PM
To: Cerruti, Shawn <scerruti@cpsc.gov>
Subject: RE: RP190048, SRAM Brakes

(b)(5)

From: Cerruti, Shawn
Sent: Wednesday, January 30, 2019 4:02 PM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: RE: RP190048, SRAM Brakes

(b)(5)

Best Regards,
Shawn M. Cerruti
Acting Supervisor
Fast Track Program
U.S. Consumer Product Safety Commission
Office of Compliance
4330 East-West Highway, 6th Floor
Bethesda, MD 20814
T: (301) 504-6811
E: scerruti@cpsc.gov
Fast Track Information: www.cpsc.gov/fasttrack

Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Kadambi, Sheela
Sent: Wednesday, January 30, 2019 3:55 PM
To: Cerruti, Shawn <scerruti@cpsc.gov>
Subject: RE: RP190048, SRAM Brakes

Hi Shawn,

(b)(5)

Regards
Sheela Kadambi
Compliance officer
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
301-504-7561
skadambi@cpsc.gov

From: Cerruti, Shawn
Sent: Wednesday, January 30, 2019 3:30 PM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: RE: RP190048, SRAM Brakes

Thank you.

Best Regards,
Shawn M. Cerruti
Acting Supervisor

Fast Track Program
U.S. Consumer Product Safety Commission
Office of Compliance
4330 East-West Highway, 6th Floor
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Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Kadambi, Sheela
Sent: Wednesday, January 30, 2019 3:30 PM
To: Cerruti, Shawn <scerruti@cpsc.gov>
Subject: RE: RP190048, SRAM Brakes

(b)(5)

Regards
Sheela
Sheela Kadambi
Compliance officer
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
301-504-7561
skadambi@cpsc.gov

From: Cerruti, Shawn
Sent: Wednesday, January 30, 2019 3:27 PM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: FW: RP190048, SRAM Brakes

(b)(5)

Best Regards,
Shawn M. Cerruti
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Fast Track Program
U.S. Consumer Product Safety Commission
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4330 East-West Highway, 6th Floor
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T: (301) 504-6811

E: scerruti@cpsc.gov

Fast Track Information: www.cpsc.gov/fasttrack

Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Rose, Blake

Sent: Wednesday, January 30, 2019 3:26 PM

To: Cerruti, Shawn <scerruti@cpsc.gov>

Subject: RP190048, SRAM Brakes

Shawn,

(b)(5)

Blake G. Rose

Director

Defect Investigations Division

Office of Compliance and Field Operations

U.S. Consumer Product Safety Commission

4330 East West Highway

Bethesda, MD 20814

Office: 301-504-7613

Email: brose@cpsc.gov

From: [Kadambi, Sheela](#)
To: [Cerruti, Shawn](#)
Subject: RE: RP190048, SRAM Brakes
Date: Wednesday, January 30, 2019 4:07:44 PM

(b)(5)

From: Cerruti, Shawn
Sent: Wednesday, January 30, 2019 3:56 PM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: RE: RP190048, SRAM Brakes

(b)(5)

Best Regards,
Shawn M. Cerruti
Acting Supervisor
Fast Track Program
U.S. Consumer Product Safety Commission
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4330 East-West Highway, 6th Floor
Bethesda, MD 20814
T: (301) 504-6811
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Fast Track Information: www.cpsc.gov/fasttrack
Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Kadambi, Sheela
Sent: Wednesday, January 30, 2019 3:55 PM
To: Cerruti, Shawn <scerruti@cpsc.gov>
Subject: RE: RP190048, SRAM Brakes

[Hi Shawn,](#)

(b)(5)

(b)(5)

Regards

Sheela Kadambi

Compliance officer
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
301-504-7561
skadambi@cpsc.gov

From: Cerruti, Shawn
Sent: Wednesday, January 30, 2019 3:30 PM
To: Kadambi, Sheela <Skadambi@cpsc.gov>
Subject: RE: RP190048, SRAM Brakes

Thank you.

Best Regards,

Shawn M. Cerruti

Acting Supervisor
Fast Track Program
U.S. Consumer Product Safety Commission
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Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Kadambi, Sheela
Sent: Wednesday, January 30, 2019 3:30 PM
To: Cerruti, Shawn <scerruti@cpsc.gov>
Subject: RE: RP190048, SRAM Brakes

(b)(5)

Regards
Shee;a

Sheela Kadambi

Compliance officer
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
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skadambi@cpsc.gov

From: Cerruti, Shawn
Sent: Wednesday, January 30, 2019 3:27 PM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: FW: RP190048, SRAM Brakes

(b)(5)

Best Regards,

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From: Rose, Blake
Sent: Wednesday, January 30, 2019 3:26 PM
To: Cerruti, Shawn <scerruti@cpsc.gov>
Subject: RP190048, SRAM Brakes

Shawn,

(b)(5)

Blake G. Rose
Director
Defect Investigations Division

Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
Office: 301-504-7613
Email: brose@cpsc.gov

From: [Cerruti, Shawn](#)
To: [Kadambi, Sheela](#)
Subject: RE: RP190048, SRAM Brakes
Date: Wednesday, January 30, 2019 4:02:02 PM

(b)(5)

Best Regards,

Shawn M. Cerruti

Acting Supervisor

Fast Track Program

U.S. Consumer Product Safety Commission

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4330 East-West Highway, 6th Floor

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From: Kadambi, Sheela
Sent: Wednesday, January 30, 2019 3:55 PM
To: Cerruti, Shawn <scerruti@cpsc.gov>
Subject: RE: RP190048, SRAM Brakes

Hi Shawn,

(b)(5)

Regards

Sheela Kadambi

Compliance officer

Office of Compliance and Field Operations

U.S. Consumer Product Safety Commission

4330 East West Highway

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skadambi@cpsc.gov

From: Cerruti, Shawn
Sent: Wednesday, January 30, 2019 3:30 PM
To: Kadambi, Sheela <Skadambi@cpsc.gov>
Subject: RE: RP190048, SRAM Brakes

Thank you.

Best Regards,
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From: Kadambi, Sheela
Sent: Wednesday, January 30, 2019 3:30 PM
To: Cerruti, Shawn <scerruti@cpsc.gov>
Subject: RE: RP190048, SRAM Brakes

(b)(5)

Regards
Shee;a
Sheela Kadambi
Compliance officer
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
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Bethesda, MD 20814
301-504-7561
skadambi@cpsc.gov

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Sent: Wednesday, January 30, 2019 3:27 PM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: FW: RP190048, SRAM Brakes

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Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Rose, Blake
Sent: Wednesday, January 30, 2019 3:26 PM
To: Cerruti, Shawn <scerruti@cpsc.gov>
Subject: RP190048, SRAM Brakes

Shawn,

(b)(5)

Blake G. Rose
Director
Defect Investigations Division
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
Office: 301-504-7613
Email: brose@cpsc.gov

From: [Cerruti, Shawn](#)
To: [Kadambi, Sheela](#)
Subject: RE: RP190048, SRAM Brakes
Date: Wednesday, January 30, 2019 3:59:45 PM

(b)(5)

Best Regards,
Shawn M. Cerruti
Acting Supervisor
Fast Track Program
U.S. Consumer Product Safety Commission
Office of Compliance
4330 East-West Highway, 6th Floor
Bethesda, MD 20814
T: (301) 504-6811
E: scerruti@cpsc.gov
Fast Track Information: www.cpsc.gov/fasttrack
Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Kadambi, Sheela
Sent: Wednesday, January 30, 2019 3:55 PM
To: Cerruti, Shawn <scerruti@cpsc.gov>
Subject: RE: RP190048, SRAM Brakes

[Hi Shawn,](#)

(b)(5)

Regards
Sheela Kadambi
Compliance officer
Office of Compliance and Field Operations

U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
301-504-7561
skadambi@cpsc.gov

From: Cerruti, Shawn
Sent: Wednesday, January 30, 2019 3:30 PM
To: Kadambi, Sheela <Skadambi@cpsc.gov>
Subject: RE: RP190048, SRAM Brakes

Thank you.

Best Regards,
Shaun M. Cerruti
Acting Supervisor
Fast Track Program
U.S. Consumer Product Safety Commission
Office of Compliance
4330 East-West Highway, 6th Floor
Bethesda, MD 20814
T: (301) 504-6811
E: scerruti@cpsc.gov
Fast Track Information: www.cpsc.gov/fasttrack
Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Kadambi, Sheela
Sent: Wednesday, January 30, 2019 3:30 PM
To: Cerruti, Shawn <scerruti@cpsc.gov>
Subject: RE: RP190048, SRAM Brakes

(b)(5)

Regards
Sheela
Sheela Kadambi
Compliance officer
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
301-504-7561
skadambi@cpsc.gov

From: Cerruti, Shawn
Sent: Wednesday, January 30, 2019 3:27 PM
To: Kadambi, Sheela <Skadambi@cpsc.gov>
Subject: FW: RP190048, SRAM Brakes

(b)(5)

Best Regards,
Shaun M. Cerruti
Acting Supervisor
Fast Track Program
U.S. Consumer Product Safety Commission

Office of Compliance
4330 East-West Highway, 6th Floor
Bethesda, MD 20814
T: (301) 504-6811
E: scerruti@cpsc.gov
Fast Track Information: www.cpsc.gov/fasttrack
Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Rose, Blake
Sent: Wednesday, January 30, 2019 3:26 PM
To: Cerruti, Shawn <scerruti@cpsc.gov>
Subject: RP190048, SRAM Brakes

Shawn,

(b)(5)

Blake G. Rose
Director
Defect Investigations Division
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
Office: 301-504-7613
Email: brose@cpsc.gov

From: [Kadambi, Sheela](#)
To: [Cerruti, Shawn](#)
Subject: RE: RP190048, SRAM Brakes
Date: Wednesday, January 30, 2019 3:58:03 PM

(b)(5)

From: Cerruti, Shawn
Sent: Wednesday, January 30, 2019 3:56 PM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: RE: RP190048, SRAM Brakes

(b)(5)

Best Regards,
Shawn M. Cerruti
Acting Supervisor
Fast Track Program
U.S. Consumer Product Safety Commission
Office of Compliance
4330 East-West Highway, 6th Floor
Bethesda, MD 20814
T: (301) 504-6811
E: scerruti@cpsc.gov
Fast Track Information: www.cpsc.gov/fasttrack
Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Kadambi, Sheela
Sent: Wednesday, January 30, 2019 3:55 PM
To: Cerruti, Shawn <scerruti@cpsc.gov>
Subject: RE: RP190048, SRAM Brakes

[Hi Shawn,](#)

(b)(5)

(b)(5)

Regards

Sheela Kadambi

Compliance officer

Office of Compliance and Field Operations

U.S. Consumer Product Safety Commission

4330 East West Highway

Bethesda, MD 20814

301-504-7561

skadambi@cpsc.gov

From: Cerruti, Shawn

Sent: Wednesday, January 30, 2019 3:30 PM

To: Kadambi, Sheela <SKadambi@cpsc.gov>

Subject: RE: RP190048, SRAM Brakes

Thank you.

Best Regards,

Shawn M. Cerruti

Acting Supervisor

Fast Track Program

U.S. Consumer Product Safety Commission

Office of Compliance

4330 East-West Highway, 6th Floor

Bethesda, MD 20814

T: (301) 504-6811

E: scerruti@cpsc.gov

Fast Track Information: www.cpsc.gov/fasttrack

Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Kadambi, Sheela

Sent: Wednesday, January 30, 2019 3:30 PM

To: Cerruti, Shawn <scerruti@cpsc.gov>

Subject: RE: RP190048, SRAM Brakes

(b)(5)

Regards
Shee;a
Sheela Kadambi
Compliance officer
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
301-504-7561
skadambi@cpsc.gov

From: Cerruti, Shawn
Sent: Wednesday, January 30, 2019 3:27 PM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: FW: RP190048, SRAM Brakes

(b)(5)

Best Regards,
Shawn M. Cerruti
Acting Supervisor
Fast Track Program
U.S. Consumer Product Safety Commission
Office of Compliance
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Bethesda, MD 20814
T: (301) 504-6811
E: scerruti@cpsc.gov
Fast Track Information: www.cpsc.gov/fasttrack
Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Rose, Blake
Sent: Wednesday, January 30, 2019 3:26 PM
To: Cerruti, Shawn <scerruti@cpsc.gov>
Subject: RP190048, SRAM Brakes

Shawn,

(b)(5)

Blake G. Rose

Director
Defect Investigations Division
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
Office: 301-504-7613
Email: brose@cpsc.gov

From: [Kadambi, Sheela](#)
To: [Cerruti, Shawn](#)
Subject: RE: RP190048, SRAM Brakes
Date: Wednesday, January 30, 2019 3:47:19 PM

(b)(5)

Sheela Kadambi

Compliance officer
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
301-504-7561
skadambi@cpsc.gov

From: Cerruti, Shawn
Sent: Wednesday, January 30, 2019 3:46 PM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: RE: RP190048, SRAM Brakes

Sheela,

(b)(5)

Best Regards,
Shawn M. Cerruti
Acting Supervisor
Fast Track Program
U.S. Consumer Product Safety Commission
Office of Compliance
4330 East-West Highway, 6th Floor
Bethesda, MD 20814
T: (301) 504-6811
E: scerruti@cpsc.gov
Fast Track Information: www.cpsc.gov/fasttrack
Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Kadambi, Sheela
Sent: Wednesday, January 30, 2019 3:30 PM

To: Cerruti, Shawn <scerruti@cpsc.gov>

Subject: RE: RP190048, SRAM Brakes

(b)(5)

Regards

Shee;a

Sheela Kadambi

Compliance officer

Office of Compliance and Field Operations

U.S. Consumer Product Safety Commission

4330 East West Highway

Bethesda, MD 20814

301-504-7561

skadambi@cpsc.gov

From: Cerruti, Shawn

Sent: Wednesday, January 30, 2019 3:27 PM

To: Kadambi, Sheela <SKadambi@cpsc.gov>

Subject: FW: RP190048, SRAM Brakes

(b)(5)

Best Regards,

Shawn M. Cerruti

Acting Supervisor

Fast Track Program

U.S. Consumer Product Safety Commission

Office of Compliance

4330 East-West Highway, 6th Floor

Bethesda, MD 20814

T: (301) 504-6811

E: scerruti@cpsc.gov

Fast Track Information: www.cpsc.gov/fasttrack

Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Rose, Blake

Sent: Wednesday, January 30, 2019 3:26 PM

To: Cerruti, Shawn <scerruti@cpsc.gov>

Subject: RP190048, SRAM Brakes

Shawn,

(b)(5)

Blake G. Rose
Director
Defect Investigations Division
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
Office: 301-504-7613
Email: brose@cpsc.gov

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(4) ; (b)(3):CPSA Section 6(a)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(4) ; (b)(3):CPSA Section 6(a)

of the Freedom of Information Act

IMPORTANT

SAFETY RECALL NOTICE

Dear Electra®/SRAM® Customer:

You may have an Electra bicycle equipped with a SRAM i-Motion 3, three-speed internal gear hub with a coaster brake.

These hubs are the subject of a safety recall. If your Electra bicycle has a SRAM i-Motion 3 internal gear hub with a coaster brake (and no redundant braking system – i.e. no front brake), PLEASE STOP RIDING YOUR BIKE until you determine whether your hub is part of the recall.

Some of the affected hubs may have been manufactured with grease in the internal gear hub that can get sticky over time, especially if the bicycle or hub is not used for a long period of time and/or exposed to high temperatures. If the grease in the internal gear hub becomes sticky, the brake pawls in the hub can fail to engage correctly, resulting in the loss of braking power. You could crash or fall from the bicycle.

To determine if your hub is part of the recall, please check if your Electra bicycle is one of the following models: Electra Cruiser Custom 3i, Electra Coaster 3i, Electra Hawaii 3i, Electra Hawaii 3i 24", Electra Straight 8. If you have one of these Electra bicycles and it contains a SRAM i-Motion 3 with coaster brake (and no redundant braking system), please contact SRAM or your local bicycle dealer for verification.

The affected hubs are readily identifiable by the text "SRAM i-Motion 3" on the hub shell. The affected hubs are also identifiable by the brake arm extending from the axle of the hub.

Photo 1: SRAM i-Motion 3, three speed internal gear hub with coaster brake



If you have an affected hub, please contact SRAM or your local bicycle dealer. SRAM will offer to repurchase your at a fair market, depreciated value, based on the Bicycle Blue Book (www.bicyclebluebook.com). If you prefer to keep your bicycle, SRAM will assist your local bicycle dealer to identify a compatible new hub that you can request to be installed in place of the affected hub. You can apply some of the repurchase funds toward that new hub and the installation labor, and you can keep the remainder of the funds.

We apologize for this inconvenience, but your safety is our priority. For questions about this recall, call 800-346-2928 or check our website at www.sram.com. SRAM is conducting this recall in cooperation with U.S. Consumer Product Safety Commission.



Withheld pursuant to exemption

(b)(4) ; (b)(3):CPSA Section 6(a)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(4) ; (b)(3):CPSA Section 6(a)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(4) ; (b)(3):CPSA Section 6(a)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(4) ; (b)(3):CPSA Section 6(a)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(4) ; (b)(3):CPSA Section 6(a)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(4) ; (b)(3):CPSA Section 6(a)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(4) ; (b)(3):CPSA Section 6(a)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(4) ; (b)(3):CPSA Section 6(a)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(4) ; (b)(3):CPSA Section 6(a)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

From: [Kadambi, Sheela](#)
To: ["Ejones@mayerbrown.com"](mailto:Ejones@mayerbrown.com)
Subject: RP190048 SRAM LLC - 3-speed coaster brake
Date: Thursday, November 08, 2018 3:13:50 PM
Attachments: [RP190048 - Full Report Request \(X\).pdf](#)

Good afternoon Erika,

Attached is the full report request letter for the subject case. Look forward to hearing from you. Thanks

Regards

Sheela

Sheela Kadambi

Compliance officer
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814
301-504-7561
skadambi@cpsc.gov

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

From: [Kadambi, Sheela](#)
To: ["Ejones@mayerbrown.com"](mailto:Ejones@mayerbrown.com)
Subject: RP190048 SRAM LLC - 3-speed coaster brake
Date: Wednesday, November 07, 2018 3:14:00 PM

Dear Ms. Jones,

I am the compliance officer assigned to assist you with your request for a Fast Track Recall on behalf of SRAM LLC, Inc. You can expect a full report request letter shortly. Your full report is due on November 21, 2018. Your case number is RP190048. Please let me know the date the Firm issued a stop sale notification to third parties. If the Firm has not already done so, please send a stop sale notification to the distribution chain immediately. Provide me with the date the communication is made.

Please make sure that the Firm's full report submission follows the format outlined in 16 C.F.R. § 1115.13(d) and that it includes the following information:

- Complete details for any incidents reported to the Firm not previously disclosed.
 - o Include any correspondence, call/email intake records, images, and documents related to each incident.
 - o Include the consumer's contact information.
 - o Provide any related legal and medical records as applicable
- Signed delegation of authority. (template available 16 C.F.R. § 1115.13(a))
- If the Firm proposes a replacement product as any part of the remedy, please send following information about the replacement:
 - o testing documents (test procedures and test reports)
 - o technical specifications
 - o length of time the product has been in the marketplace
 - o any reported incidents
- A detailed list where the products were sold or distributed with contact information.
- A detailed list of any known owners/purchasers if applicable.
 - o Draft consumer letter in MS Word Format
- Draft letters in MS Word format for the distribution chain
- Draft Press Release on our template (see attached).
 - o 1-2 MB, separate jpg images used in the press release
- Draft poster (in word) if sold in brick and mortar locations (see attached for more information)
- Draft hotline script (guidance can be found at <http://www.cpsc.gov/en/Business--Manufacturing/Recall-Guidance/>)
- Was the product sold in Puerto Rico, Canada or Mexico?
- Proposed plan for communicating via Firm's own Social Media accounts.
- Provide details on how the Firm plans to change/improve quality control to prevent a recurrence.
- Confirm that the recall information will appear or be linked to directly on the Firm's homepage.
 - o Please provide details or a visual mock-up of the proposed placement.
- Please explain the Firm's plan to handle reverse logistics.
 - o How will consumers return the product to the firm for destruction?
 - o How will the Firm destroy and dispose of the defective products?
 - o Remember that CPSC may want to witness the destruction of the

recovered/defective product. Notification must be made to recalledproductsdisposal@cpsc.gov prior disposal or transfer to a third party.

Look forward to hearing from you.

Regards

Sheela

Sheela Kadambi

Compliance officer

Office of Compliance and Field Operations

U.S. Consumer Product Safety Commission

4330 East West Highway

Bethesda, MD 20814

301-504-7561

skadambi@cpsc.gov

From: [Kadambi, Sheela](#)
To: [Cerruti, Shawn](#)
Subject: RE: Section 15 report
Date: Wednesday, November 07, 2018 2:29:34 PM

I have it already and am working on it. Thanks

From: Cerruti, Shawn
Sent: Wednesday, November 07, 2018 2:29 PM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: FW: Section 15 report

Hi, Here is the initial report. It apparently came in via email last week. Thanks for your help.

Best Regards,

Shawn M. Cerruti

Acting Team Lead

Fast Track Program

U.S. Consumer Product Safety Commission

Office of Compliance

4330 East-West Highway, 6th Floor

Bethesda, MD 20814

T: (301) 504-6811

E: scerruti@cpsc.gov

Fast Track Information: www.cpsc.gov/fasttrack

Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Rose, Blake
Sent: Wednesday, November 07, 2018 9:45 AM
To: Cerruti, Shawn <scerruti@cpsc.gov>
Subject: FW: Section 15 report

Shawn,

It doesn't appear that this one got forwarded from the Sec. 15 mailbox. Please assign. Thanks.

Blake G. Rose

Director

Defect Investigations Division

Office of Compliance and Field Operations

U.S. Consumer Product Safety Commission

4330 East West Highway

Bethesda, MD 20814

Office: 301-504-7613

Email: brose@cpsc.gov

From: Cave, Carol

Sent: Tuesday, November 06, 2018 1:49 PM

To: Rose, Blake <BRose@cpsc.gov>

Subject: FW: Section 15 report

(b)(3):CPSA Section 6(b)(1)

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

From: [Kadambi, Sheela](#)
To: [Cerruti, Shawn](#)
Subject: RE: Section 15 report
Date: Wednesday, November 07, 2018 2:27:37 PM

(b)(5)

From: Cerruti, Shawn
Sent: Wednesday, November 07, 2018 2:26 PM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: RE: Section 15 report

(b)(5)

Best Regards,
Shawn M. Cerruti
Acting Team Lead
Fast Track Program
U.S. Consumer Product Safety Commission
Office of Compliance
4330 East-West Highway, 6th Floor
Bethesda, MD 20814
T: (301) 504-6811
E: scerruti@cpsc.gov
Fast Track Information: www.cpsc.gov/fasttrack
Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Kadambi, Sheela
Sent: Wednesday, November 07, 2018 2:19 PM
To: Cerruti, Shawn <scerruti@cpsc.gov>
Subject: RE: Section 15 report

(b)(5)

From: Cerruti, Shawn
Sent: Wednesday, November 07, 2018 2:05 PM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: FW: Section 15 report

Hi Sheela,

Can you please handle this case? Thank you.

Best Regards,

Shawn M. Cerruti

Acting Team Lead

Fast Track Program

U.S. Consumer Product Safety Commission

Office of Compliance

4330 East-West Highway, 6th Floor

Bethesda, MD 20814

T: (301) 504-6811

E: scerruti@cpsc.gov

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Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Rose, Blake

Sent: Wednesday, November 07, 2018 9:45 AM

To: Cerruti, Shawn <scerruti@cpsc.gov>

Subject: FW: Section 15 report

Shawn,

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Blake G. Rose

Director

Defect Investigations Division

Office of Compliance and Field Operations

U.S. Consumer Product Safety Commission

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Bethesda, MD 20814

Office: 301-504-7613

Email: brose@cpsc.gov

From: Cave, Carol

Sent: Tuesday, November 06, 2018 1:49 PM

To: Rose, Blake <BRose@cpsc.gov>

Subject: FW: Section 15 report

(b)(3);CPSA Section 6(b)(1)

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

From: [Kadambi, Sheela](#)
To: [Cerruti, Shawn](#)
Subject: RE: Section 15 report
Date: Wednesday, November 07, 2018 2:22:19 PM

(b)(5)

From: Cerruti, Shawn
Sent: Wednesday, November 07, 2018 2:05 PM
To: Kadambi, Sheela <SKadambi@cpsc.gov>
Subject: FW: Section 15 report

Hi Sheela,

Can you please handle this case? Thank you.

Best Regards,
Shawn M. Cerruti
Acting Team Lead
Fast Track Program
U.S. Consumer Product Safety Commission
Office of Compliance
4330 East-West Highway, 6th Floor
Bethesda, MD 20814
T: (301) 504-6811
E: scerruti@cpsc.gov
Fast Track Information: www.cpsc.gov/fasttrack
Recall Guidance: <https://www.cpsc.gov/Business--Manufacturing/Recall-Guidance>

From: Rose, Blake
Sent: Wednesday, November 07, 2018 9:45 AM
To: Cerruti, Shawn <scerruti@cpsc.gov>
Subject: FW: Section 15 report

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It doesn't appear that this one got forwarded from the Sec. 15 mailbox. Please assign. Thanks.

Blake G. Rose
Director
Defect Investigations Division
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814

Office: 301-504-7613

Email: brose@cpsc.gov

From: Cave, Carol

Sent: Tuesday, November 06, 2018 1:49 PM

To: Rose, Blake <BRose@cpsc.gov>

Subject: FW: Section 15 report

(b)(3).CPSA Section 6(b)(1)

Withheld pursuant to exemption

(b)(3):CPSA Section 6(b)(1)

of the Freedom of Information Act

CPSC Monthly Progress Report for Corrective Action Plans (CAP)

Case Number: RP 190048

Reporting Dates	2/21/2019 to 3/31/2019	Compliance Officer:	Sheela Kadambi
Recalling Firm:	SRAM, LLC	Product:	SRAM iMotion 3 internal gear hubs

I) PRODUCTS CORRECTED BY FIRM AS APPLICABLE UNDER CAP			
Location of Products	Total Products Affected by Recall	Corrections this Reporting Period	Total Cumulative Corrections for Recall
With Manufacturer:	(b)(4); (b)(3):CPSA Section 6(a)		
With Distributor: **			
With Retailers:			
With Consumers:			
TOTAL:	6993	(b)(4); (b)(3):CPSA Section 6(a)	
(b)(4); (b)(3):CPSA Section 6(a)			
II) INCIDENT UPDATE			
	Total incidents Reported this Period that Occurred <u>Before</u> the Recall	Total Incidents Reported this Period that Occurred <u>After</u> the Recall	
Incidents	(b)(4); (b)(3):CPSA Section 6(a)		
Injuries			
Deaths			

III) Notifications Made by Firm and Consumer Responses as Applicable under CAP			
How many consumers did you notify this reporting period by:			
Phone:	#		
Email:	#		
Regular Mail:	#		
How many consumers contacted your Firm this reporting period about the recall as a result of any notification?			
Phone:	#	(b)(4); (b)(3):CPSA Section 6(a)	
Email:	#		
Regular Mail:	#		
Registration Cards:	#		
Is the recall currently posted on your homepage? YES ___ If no, explain: _____			
How many website hits did your Firm have this reporting period for this recall? # (b)(4); (b)(3):CPSA Section 6(a)			
As applicable under your CAP, how many times in this reporting period did your Firm post the recall notice on the following:			
Facebook:	#	# of shares:	# of Likes:
Twitter:	#	# of Re-Tweets:	# of Twitter Followers:
Other:	#	Explain:	(b)(4); (b)(3):CPSA Section 6(a)
Ad Placements:	#	Explain:	
Recalling companies are encouraged to monitor on line re-sale, auction, and wholesale websites. If monitored, did you find the recall product on any sites <input type="checkbox"/> Yes / <input type="checkbox"/> No - Describe action taken:			

NOTE: Email or Fax completed from by the FIRST of EACH MONTH to Judy Smith, Recall Coordinator, at: jsmith@cpsc.gov or 301-504-0359. If you have questions, contact your Compliance Officer.

Updated 10/2015

CPSC Monthly Progress Report for Corrective Action Plans (CAP)

Case Number: RP 190048

Reporting Dates	4/1/2019 to 4/30/2019	Compliance Officer:	Sheela Kadambi
Recalling Firm:	SRAM, LLC	Product:	SRAM iMotion 3 internal gear hubs

I) PRODUCTS CORRECTED BY FIRM AS APPLICABLE UNDER CAP			
Location of Products	Total Products Affected by Recall	Corrections this Reporting Period	Total Cumulative Corrections for Recall
With Manufacturer:	(b)(4); (b)(3):CPSA Section 6(a)		
With Distributor: **			
With Retailers:			
With Consumers:			
TOTAL:	6993	(b)(4); (b)(3):CPSA Section 6(a)	
(b)(4); (b)(3):CPSA Section 6(a)			
II) INCIDENT UPDATE			
	Total incidents Reported this Period that Occurred <u>Before</u> the Recall	Total Incidents Reported this Period that Occurred <u>After</u> the Recall	
Incidents	(b)(4); (b)(3):CPSA Section 6(a)		
Injuries			
Deaths			

III) Notifications Made by Firm and Consumer Responses as Applicable under CAP			
How many consumers did you notify this reporting period by:			
Phone:	#	_____	
Email:	#	_____	
Regular Mail:	#	_____	
How many consumers contacted your Firm this reporting period about the recall as a result of any notification?			
Phone:	#	(b)(4); (b)(3):CPSA Section 6(a)	
Email:	#	_____	
Regular Mail:	#	_____	
Registration Cards:	#	_____	
Is the recall currently posted on your homepage? YES ___ If no, explain: _____			
How many website hits did your Firm have this reporting period for this recall? # (b)(4); (b)(3):CPSA			
As applicable under your CAP, how many times in this reporting period did your Firm post the recall notice on the following:			
Facebook:	#	# of shares:	# of Likes: _____
Twitter:	#	# of Re-Tweets:	# of Twitter Followers: (b)(4); (b)(3):CPSA
Other:	#	Explain:	_____
Ad Placements:	#	Explain:	_____
Recalling companies are encouraged to monitor on line re-sale, auction, and wholesale websites. If monitored, did you find the recall product on any sites <input type="checkbox"/> Yes / <input type="checkbox"/> No - Describe action taken: _____			

NOTE: Email or Fax completed from by the FIRST of EACH MONTH to Judy Smith, Recall Coordinator, at: jsmith@cpsc.gov or 301-504-0359. If you have questions, contact your Compliance Officer.

Updated 10/2015

CPSC Monthly Progress Report for Corrective Action Plans (CAP)

Case Number: RP 190048

Reporting Dates <u>5/1/2019</u> to <u>5/31/2019</u>	Compliance Officer: <u>Sheela Kadambi</u>
Recalling Firm: <u>SRAM, LLC</u>	Product: <u>SRAM iMotion 3 internal gear hubs</u>

I) PRODUCTS CORRECTED BY FIRM AS APPLICABLE UNDER CAP			
Location of Products	Total Products Affected by Recall	Corrections this Reporting Period	Total Cumulative Corrections for Recall
With Manufacturer:	(b)(4); (b)(3):CPSA Section 6(a)		
With Distributor: **			
With Retailers:			
With Consumers:			
TOTAL:	6993	(b)(4); (b)(3):CPSA Section 6(a)	
(b)(4); (b)(3):CPSA Section 6(a)			
II) INCIDENT UPDATE			
	Total incidents Reported this Period that Occurred <u>Before</u> the Recall	Total Incidents Reported this Period that Occurred <u>After</u> the Recall	
Incidents	(b)(4); (b)(3):CPSA Section 6(a)		
Injuries			
Deaths			

III) Notifications Made by Firm and Consumer Responses as Applicable under CAP			
How many consumers did you notify this reporting period by:			
Phone:	#		
Email:	#		
Regular Mail:	#		
How many consumers contacted your Firm this reporting period about the recall as a result of any notification?			
Phone:	#	(b)(4); (b)(3):CPSA Section 6(a)	
Email:	#		
Regular Mail:	#		
Registration Cards:	#		
Is the recall currently posted on your homepage? YES If no, explain: _____			
How many website hits did your Firm have this reporting period for this recall? # (b)(4); (b)(3):CPSA Section 6(a)			
As applicable under your CAP, how many times in this reporting period did your Firm post the recall notice on the following:			
Facebook:	#	# of shares:	# of Likes: _____
Twitter:	#	# of Re-Tweets:	# of Twitter Followers: (b)(4); (b)(3):CPSA Section 6(a)
Other:	#	Explain:	
Ad Placements:	#	Explain:	
Recalling companies are encouraged to monitor on line re-sale, auction, and wholesale websites. If monitored, did you find the recall product on any sites <input type="checkbox"/> Yes / <input type="checkbox"/> No - Describe action taken: _____			

NOTE: Email or Fax completed from by the FIRST of EACH MONTH to Judy Smith, Recall Coordinator, at: jsmith@cpsc.gov or 301-504-0359. If you have questions, contact your Compliance Officer.

Updated 10/2015

CPSC Monthly Progress Report for Corrective Action Plans (CAP)

Case Number: RP 190048

Reporting Dates	6/1/2019 to 6/30/2019	Compliance Officer:	Sheela Kadambi
Recalling Firm:	SRAM, LLC	Product:	SRAM iMotion 3 internal gear hubs

I) PRODUCTS CORRECTED BY FIRM AS APPLICABLE UNDER CAP			
Location of Products	Total Products Affected by Recall	Corrections this Reporting Period	Total Cumulative Corrections for Recall
With Manufacturer:	(b)(4); (b)(3):CPSA Section 6(a)		
With Distributor: **			
With Retailers:			
With Consumers:			
TOTAL:	6993	(b)(4); (b)(3):CPSA Section 6(a)	
(b)(4); (b)(3):CPSA Section 6(a)			
II) INCIDENT UPDATE			
	Total incidents Reported this Period that Occurred <u>Before</u> the Recall	Total Incidents Reported this Period that Occurred <u>After</u> the Recall	
Incidents	(b)(4); (b)(3):CPSA Section 6(a)		
Injuries			
Deaths			

III) Notifications Made by Firm and Consumer Responses as Applicable under CAP			
How many consumers did you notify this reporting period by:			
Phone:	#		
Email:	#		
Regular Mail:	#		
How many consumers contacted your Firm this reporting period about the recall as a result of any notification?			
Phone:	#	(b)(4); (b)(3):CPSA Section 6(a)	
Email:	#		
Regular Mail:	#		
Registration Cards:	#		
Is the recall currently posted on your homepage? YES ___ If no, explain: _____			
How many website hits did your Firm have this reporting period for this recall? # (b)(4); (b)(3):CPSA Section 6(a)			
As applicable under your CAP, how many times in this reporting period did your Firm post the recall notice on the following:			
Facebook:	#	# of shares:	# of Likes: _____
Twitter:	#	# of Re-Tweets:	# of Twitter Followers: (b)(4); (b)(3):CPSA
Other:	#	Explain:	
Ad Placements:	#	Explain:	
Recalling companies are encouraged to monitor on line re-sale, auction, and wholesale websites. If monitored, did you find the recall product on any sites <input type="checkbox"/> Yes / <input type="checkbox"/> No - Describe action taken: _____			

NOTE: Email or Fax completed from by the FIRST of EACH MONTH to Judy Smith, Recall Coordinator, at: jsmith@cpsc.gov or 301-504-0359. If you have questions, contact your Compliance Officer.

Updated 10/2015

CPSC Monthly Progress Report for Corrective Action Plans (CAP)

Case Number: RP 190048

Reporting Dates	7/1/2019 to 7/31/2019	Compliance Officer:	Sheela Kadambi
Recalling Firm:	SRAM, LLC	Product:	SRAM iMotion 3 internal gear hubs

I) PRODUCTS CORRECTED BY FIRM AS APPLICABLE UNDER CAP			
Location of Products	Total Products Affected by Recall	Corrections this Reporting Period	Total Cumulative Corrections for Recall
With Manufacturer:	(b)(4); (b)(3):CPSA Section 6(a)		
With Distributor: **			
With Retailers:			
With Consumers:			
TOTAL:	6993	(b)(4); (b)(3):CPSA Section 6(a)	
(b)(4); (b)(3):CPSA Section 6(a)			
II) INCIDENT UPDATE			
	Total incidents Reported this Period that Occurred <u>Before</u> the Recall	Total Incidents Reported this Period that Occurred <u>After</u> the Recall	
Incidents	(b)(4); (b)(3):CPSA Section 6(a)		
Injuries			
Deaths			

III) Notifications Made by Firm and Consumer Responses as Applicable under CAP			
How many consumers did you notify this reporting period by:			
Phone:	#	_____	
Email:	#	_____	
Regular Mail:	#	_____	
How many consumers contacted your Firm this reporting period about the recall as a result of any notification?			
Phone:	#	(b)(4); (b)(3):CPSA Section 6(a)	
Email:	#	_____	
Regular Mail:	#	_____	
Registration Cards:	#	_____	
Is the recall currently posted on your homepage? YES ___ If no, explain: _____			
How many website hits did your Firm have this reporting period for this recall? # (b)(4); _____			
As applicable under your CAP, how many times in this reporting period did your Firm post the recall notice on the following:			
Facebook:	#	# of shares: _____	# of Likes: _____
Twitter:	#	# of Re-Tweets: _____	# of Twitter Followers: (b)(4); (b)(3):CPSA
Other:	#	Explain: _____	
Ad Placements:	#	Explain: _____	
Recalling companies are encouraged to monitor on line re-sale, auction, and wholesale websites. If monitored, did you find the recall product on any sites <input type="checkbox"/> Yes / <input type="checkbox"/> No - Describe action taken: _____			

NOTE: Email or Fax completed from by the FIRST of EACH MONTH to Judy Smith, Recall Coordinator, at: jsmith@cpsc.gov or 301-504-0359. If you have questions, contact your Compliance Officer.

Updated 10/2015

CPSC Monthly Progress Report for Corrective Action Plans (CAP)Case Number: **RP 190048**

Reporting Dates	<u>8/1/2019</u> to <u>8/31/2019</u>	Compliance Officer:	<u>Sheela Kadambi</u>
Recalling Firm:	<u>SRAM, LLC</u>	Product:	<u>SRAM iMotion 3 internal gear hubs</u>

I) PRODUCTS CORRECTED BY FIRM AS APPLICABLE UNDER CAP

Location of Products	Total Products Affected by Recall	Corrections this Reporting Period	Total Cumulative Corrections for Recall
With Manufacturer:	(b)(4); (b)(3):CPSA Section 6(a)		
With Distributor: **			
With Retailers:			
With Consumers:			
TOTAL:	<u>6993</u>	(b)(4); (b)(3):CPSA Section 6(a)	
(b)(4); (b)(3):CPSA Section 6(a)			

II) INCIDENT UPDATE

	Total incidents Reported this Period that Occurred <u>Before</u> the Recall	Total Incidents Reported this Period that Occurred <u>After</u> the Recall
Incidents	(b)(4); (b)(3):CPSA Section 6(a)	
Injuries		
Deaths		

III) Notifications Made by Firm and Consumer Responses as Applicable under CAP

How many consumers did you notify this reporting period by:

Phone: # _____

Email: # _____

Regular Mail: # _____

How many consumers contacted your Firm this reporting period about the recall as a result of any notification?

Phone: # (b)(4); (b)(3):CPSA Section 6(a)

Email: # _____

Regular Mail: # _____

Registration Cards: # _____

Is the recall currently posted on your homepage? YES ___ If no, explain: _____

How many website hits did your Firm have this reporting period for this recall? # _____

(b)(4); (b)(3):CPSA Section 6(a)

As applicable under your CAP, how many times in this reporting period did your Firm post the recall notice on the following:

Facebook: # _____ # of shares: _____ # of Likes: _____

Twitter: # _____ # of Re-Tweets: _____ # of Twitter Followers: (b)(4); (b)(3):CPSA

Other: # _____ Explain: _____

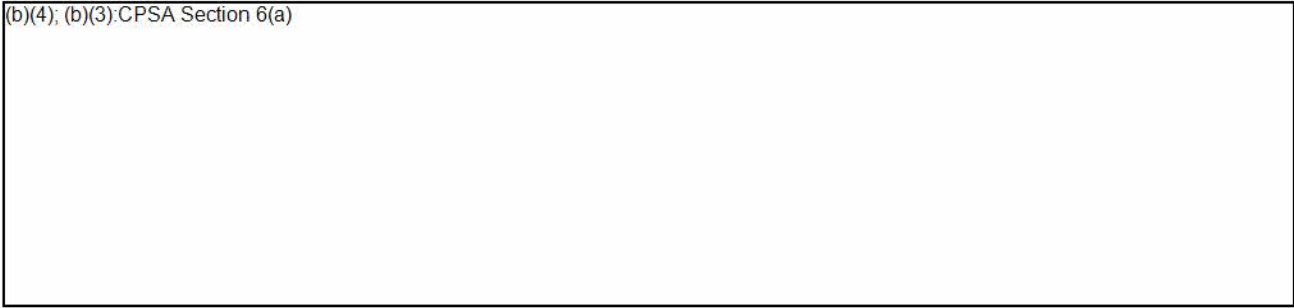
Ad Placements: # _____ Explain: _____

Recalling companies are encouraged to monitor on line re-sale, auction, and wholesale websites. If monitored, did you find the recall product on any sites ☐ Yes / ☐ No - Describe action taken: _____NOTE: Email or Fax completed from by the FIRST of EACH MONTH to Judy Smith, Recall Coordinator, at: jsmith@cpsc.gov or 301-504-0359. If you have questions, contact your Compliance Officer.

Updated 10/2015

CPSC Monthly Report for SRAM iMotion 3 internal gear hub recall – Case Number: RP190048
Page 2

(b)(4); (b)(3);CPSA Section 6(a)



Smith, Judy

From: Jones, Erika Z. <EJones@mayerbrown.com>
Sent: Monday, October 07, 2019 12:16 PM
To: Smith, Judy
Cc: Kadambi, Sheela; Jones, Erika Z.
Subject: SRAM RP190048
Attachments: SRAM RP 190048 July 2019 Monthly Progress Report i3 hub.pdf; SRAM RP 190048 August 2019 Monthly Progress Report i3 hub.pdf; SRAM RP 190048 August Report attachment.pdf

Colleagues: please see the July and August monthly reports for the Corrective Action Plan in progress.

Thank you.

Erika Jones

Erika Z. Jones

Partner

Mayer Brown LLP

1999 K Street, N.W.

Washington, D.C. 20006-1101 United States of America

T +1 202 263 3232

ejones@mayerbrown.com

mayerbrown.com

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CPSC Monthly Progress Report for Corrective Action Plans (CAP)

Case Number: RP 190048

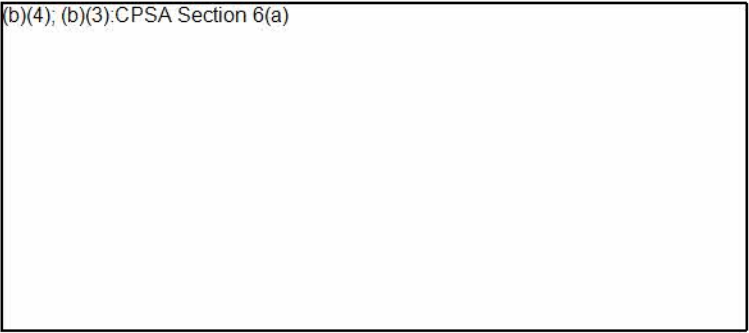
Reporting Dates	9/1/2019 to 9/30/2019	Compliance Officer:	Sheela Kadambi
Recalling Firm:	SRAM, LLC	Product:	SRAM iMotion 3 internal gear hubs

I) PRODUCTS CORRECTED BY FIRM AS APPLICABLE UNDER CAP			
Location of Products	Total Products Affected by Recall	Corrections this Reporting Period	Total Cumulative Corrections for Recall
With Manufacturer:	(b)(4); (b)(3):CPSA Section 6(a)		
With Distributor: **			
With Retailers:			
With Consumers:			
TOTAL:	6993	(b)(4); (b)(3):CPSA Section 6(a)	
(b)(4); (b)(3):CPSA Section 6(a)			
II) INCIDENT UPDATE			
	Total incidents Reported this Period that Occurred <u>Before</u> the Recall	Total Incidents Reported this Period that Occurred <u>After</u> the Recall	
Incidents	(b)(4); (b)(3):CPSA Section 6(a)		
Injuries			
Deaths			

III) Notifications Made by Firm and Consumer Responses as Applicable under CAP			
How many consumers did you notify this reporting period by:			
Phone:	#		
Email:	#		
Regular Mail:	#		
How many consumers contacted your Firm this reporting period about the recall as a result of any notification?			
Phone:	#	(b)(4); (b)(3):CPSA Section 6(a)	
Email:	#		
Regular Mail:	#		
Registration Cards:	#		
Is the recall currently posted on your homepage? YES <input type="checkbox"/> If no, explain: _____			
How many website hits did your Firm have this reporting period for this recall? # (b)(4); (b)(3):CPSA Section 6(a)			
As applicable under your CAP, how many times in this reporting period did your Firm post the recall notice on the following:			
Facebook:	#	# of shares:	# of Likes:
Twitter:	#	# of Re-Tweets:	# of Twitter Followers:
Other:	#	Explain:	(b)(4); (b)(3):CPSA Section 6(a)
Ad Placements:	#	Explain:	
Recalling companies are encouraged to monitor on line re-sale, auction, and wholesale websites. If monitored, did you find the recall product on any sites <input type="checkbox"/> Yes / <input type="checkbox"/> No - Describe action taken: _____			

CPSC Monthly Report for SRAM iMotion 3 internal gear hub recall – Case Number: RP190048
Page 2

(b)(4); (b)(3); CPSA Section 6(a)



Smith, Judy

From: Jones, Erika Z. <EJones@mayerbrown.com>
Sent: Tuesday, October 15, 2019 4:06 PM
To: Smith, Judy; Kadambi, Sheela
Cc: Jones, Erika Z.
Subject: SRAM RP190048
Attachments: SRAM RP 190048 September report attachment.pdf; SRAM RP190048 September 2019 Monthly Progress Report.pdf

Please see the attached progress report for the Corrective Action Plan in progress. Thank you.

Erika Z. Jones

Partner

Mayer Brown LLP

1999 K Street, N.W.

Washington, D.C. 20006-1101 United States of America

T +1 202 263 3232

ejones@mayerbrown.com

mayerbrown.com

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CPSC Monthly Progress Report for Corrective Action Plans (CAP)

Case Number: RP 190048

Reporting Dates	10/1/2019 to 10/31/2019	Compliance Officer:	Sheela Kadambi
Recalling Firm:	SRAM, LLC	Product:	SRAM iMotion 3 internal gear hubs

I) PRODUCTS CORRECTED BY FIRM AS APPLICABLE UNDER CAP			
Location of Products	Total Products Affected by Recall	Corrections this Reporting Period	Total Cumulative Corrections for Recall
With Manufacturer:	(b)(4); (b)(3):CPSA Section 6(a)		
With Distributor: **			
With Retailers:			
With Consumers:			
TOTAL:	6993	(b)(4); (b)(3):CPSA Section 6(a)	
(b)(4); (b)(3):CPSA Section 6(a)			
II) INCIDENT UPDATE			
	Total Incidents Reported this Period that Occurred <u>Before</u> the Recall	Total Incidents Reported this Period that Occurred <u>After</u> the Recall	
Incidents	(b)(4); (b)(3):CPSA Section 6(a)		
Injuries			
Deaths			

III) Notifications Made by Firm and Consumer Responses as Applicable under CAP			
How many consumers did you notify this reporting period by:			
Phone:	#		
Email:	#		
Regular Mail:	#		
How many consumers contacted your Firm this reporting period about the recall as a result of any notification?			
Phone:	#	(b)(4); (b)(3):CPSA Section 6(a)	
Email:	#		
Regular Mail:	#		
Registration Cards:	#		
Is the recall currently posted on your homepage? YES ___ If no, explain: _____			
How many website hits did your Firm have this reporting period for this recall? # (b)(4); (b)(3):CPSA Section 6(a)			
As applicable under your CAP, how many times in this reporting period did your Firm post the recall notice on the following:			
Facebook:	#	# of shares:	# of Likes: _____
Twitter:	#	# of Re-Tweets:	# of Twitter Followers: (b)(4); (b)(3):CPSA Section 6(a)
Other:	#	Explain: _____	
Ad Placements:	#	Explain: _____	
Recalling companies are encouraged to monitor on line re-sale, auction, and wholesale websites. If monitored, did you find the recall product on any sites <input type="checkbox"/> Yes / <input type="checkbox"/> No - Describe action taken: _____			

Smith, Judy

From: Jones, Erika Z. <EJones@mayerbrown.com>
Sent: Monday, December 30, 2019 5:14 PM
To: Smith, Judy; Kadambi, Sheela
Cc: Jones, Erika Z.
Subject: SRAM RP190048
Attachments: SRAM RP190048 November 2019 Monthly Progress Report i3 hub.pdf; SRAM RP190048 October 2019 Monthly Progress Report i3 hub.pdf

Please see the attached progress reports for the corrective action plan in progress.

Thank you.

Erika Z. Jones

Partner

Mayer Brown LLP
1999 K Street, N.W.
Washington, D.C. 20006-1101 United States of America
T +1 202 263 3232

ejones@mayerbrown.com
mayerbrown.com

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CPSC Monthly Progress Report for Corrective Action Plans (CAP)

Case Number: RP 190048

Reporting Dates	11/1/2019 to 11/30/2019	Compliance Officer:	Sheela Kadambi
Recalling Firm:	SRAM, LLC	Product:	SRAM iMotion 3 internal gear hubs

I) PRODUCTS CORRECTED BY FIRM AS APPLICABLE UNDER CAP			
Location of Products	Total Products Affected by Recall	Corrections this Reporting Period	Total Cumulative Corrections for Recall
With Manufacturer:	(b)(4); (b)(3):CPSA Section 6(a)		
With Distributor: **			
With Retailers:			
With Consumers:			
TOTAL:	6993	(b)(4); (b)(3):CPSA Section 6(a)	
(b)(4); (b)(3):CPSA Section 6(a)			
II) INCIDENT UPDATE			
	Total incidents Reported this Period that Occurred <u>Before</u> the Recall	Total Incidents Reported this Period that Occurred <u>After</u> the Recall	
Incidents	(b)(4); (b)(3):CPSA Section 6(a)		
Injuries			
Deaths			

III) Notifications Made by Firm and Consumer Responses as Applicable under CAP			
How many consumers did you notify this reporting period by:			
Phone:	#		
Email:	#		
Regular Mail:	#		
How many consumers contacted your Firm this reporting period about the recall as a result of any notification?			
Phone:	#	(b)(4); (b)(3):CPSA Section 6(a)	
Email:	#		
Regular Mail:	#		
Registration Cards:	#		
Is the recall currently posted on your homepage? YES ___ If no, explain: _____			
How many website hits did your Firm have this reporting period for this recall? # (b)(4);			
As applicable under your CAP, how many times in this reporting period did your Firm post the recall notice on the following:			
Facebook:	#	# of shares:	# of Likes:
Twitter:	#	# of Re-Tweets:	# of Twitter Followers:
Other:	#	Explain:	(b)(4); (b)(3):CPSA Section 6(a)
Ad Placements:	#	Explain:	
Recalling companies are encouraged to monitor on line re-sale, auction, and wholesale websites. If monitored, did you find the recall product on any sites <input type="checkbox"/> Yes / <input type="checkbox"/> No - Describe action taken:			

NOTE: Email or Fax completed from by the FIRST of EACH MONTH to Judy Smith, Recall Coordinator, at: jsmith@cpsc.gov or 301-504-0359. If you have questions, contact your Compliance Officer.

Updated 10/2015

CPSC Monthly Progress Report for Corrective Action Plans (CAP)

Case Number: RP 190048

Reporting Dates	12/1/2019 to 12/31/2019	Compliance Officer:	Sheela Kadambi
Recalling Firm:	SRAM, LLC	Product:	SRAM iMotion 3 internal gear hubs

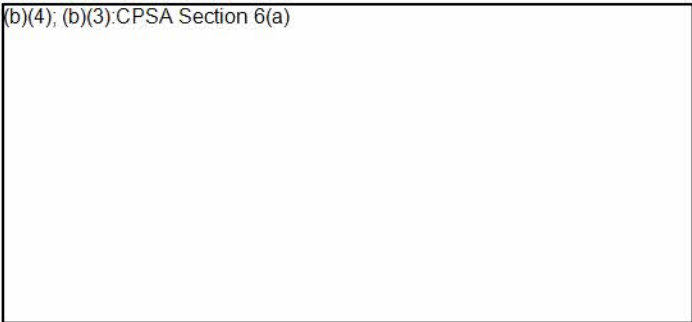
I) PRODUCTS CORRECTED BY FIRM AS APPLICABLE UNDER CAP			
Location of Products	Total Products Affected by Recall	Corrections this Reporting Period	Total Cumulative Corrections for Recall
With Manufacturer:	(b)(4); (b)(3):CPSA Section 6(a)		
With Distributor: **			
With Retailers:			
With Consumers:			
TOTAL:	6993	(b)(4); (b)(3):CPSA Section 6(a)	
(b)(4); (b)(3):CPSA Section 6(a)			
II) INCIDENT UPDATE			
	Total incidents Reported this Period that Occurred <u>Before</u> the Recall	Total Incidents Reported this Period that Occurred <u>After</u> the Recall	
Incidents	(b)(4); (b)(3):CPSA Section 6(a)		
Injuries			
Deaths			

III) Notifications Made by Firm and Consumer Responses as Applicable under CAP			
How many consumers did you notify this reporting period by:			
Phone:	#		
Email:	#		
Regular Mail:	#		
How many consumers contacted your Firm this reporting period about the recall as a result of any notification?			
Phone:	#	(b)(4); (b)(3):CPSA Section 6(a)	
Email:	#		
Regular Mail:	#		
Registration Cards:	#		
Is the recall currently posted on your homepage? YES ___ If no, explain: _____			
How many website hits did your Firm have this reporting period for this recall? # (b)(4); (b)(3):CPSA Section 6(a)			
As applicable under your CAP, how many times in this reporting period did your Firm post the recall notice on the following:			
Facebook:	#	# of shares:	# of Likes:
Twitter:	#	# of Re-Tweets:	# of Twitter Followers:
Other:	#	Explain:	(b)(4); (b)(3):CPSA
Ad Placements:	#	Explain:	
Recalling companies are encouraged to monitor on line re-sale, auction, and wholesale websites. If monitored, did you find the recall product on any sites <input type="checkbox"/> Yes / <input type="checkbox"/> No - Describe action taken: _____			

CPSC Monthly Report for SRAM iMotion 3 internal gear hub recall – Case Number: RP190048

Page 2

(b)(4); (b)(3):CPSA Section 6(a)



Smith, Judy

From: Jones, Erika Z. <EJones@mayerbrown.com>
Sent: Sunday, January 12, 2020 10:39 PM
To: Smith, Judy; Kadambi, Sheela
Cc: Jones, Erika Z.
Subject: SRAM RP190048
Attachments: SRAM RP190048 December 2019 Monthly Progress Report i3 hub.pdf; SRAM RP190048 December Report attachment.pdf

Please see the attached progress report for the Corrective Action Plan in progress.

Thank you.

Erika Z. Jones

Partner

Mayer Brown LLP

1999 K Street, N.W.

Washington, D.C. 20006-1101 United States of America

T +1 202 263 3232

ejones@mayerbrown.com

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CPSC Monthly Progress Report for Corrective Action Plans (CAP)

Case Number: RP 190048

Reporting Dates	1/1/2020 to 1/31/2020	Compliance Officer:	Sheela Kadambi
Recalling Firm:	SRAM, LLC	Product:	SRAM iMotion 3 internal gear hubs

I) PRODUCTS CORRECTED BY FIRM AS APPLICABLE UNDER CAP			
Location of Products	Total Products Affected by Recall	Corrections this Reporting Period	Total Cumulative Corrections for Recall
With Manufacturer:	(b)(4); (b)(3):CPSA Section 6(a)		
With Distributor: **			
With Retailers:			
With Consumers:			
TOTAL:	6993	(b)(4); (b)(3):CPSA Section 6(a)	
(b)(4); (b)(3):CPSA Section 6(a)			
II) INCIDENT UPDATE			
	Total incidents Reported this Period that Occurred <u>Before</u> the Recall	Total Incidents Reported this Period that Occurred <u>After</u> the Recall	
Incidents	(b)(4); (b)(3):CPSA Section 6(a)		
Injuries			
Deaths			

III) Notifications Made by Firm and Consumer Responses as Applicable under CAP			
How many consumers did you notify this reporting period by:			
Phone:	#		
Email:	#		
Regular Mail:	#		
How many consumers contacted your Firm this reporting period about the recall as a result of any notification?			
Phone:	#	(b)(4); (b)(3):CPSA Section 6(a)	
Email:	#		
Regular Mail:	#		
Registration Cards:	#		
Is the recall currently posted on your homepage? YES ___ If no, explain: _____			
How many website hits did your Firm have this reporting period for this recall? # (b)(4); (b)(3):CPSA Section 6(a)			
As applicable under your CAP, how many times in this reporting period did your Firm post the recall notice on the following:			
Facebook:	#	# of shares:	# of Likes:
Twitter:	#	# of Re-Tweets:	# of Twitter Followers:
Other:	#	Explain:	(b)(4); (b)(3):CPSA
Ad Placements:	#	Explain:	
Recalling companies are encouraged to monitor on line re-sale, auction, and wholesale websites. If monitored, did you find the recall product on any sites <input type="checkbox"/> Yes / <input type="checkbox"/> No - Describe action taken:			

NOTE: Email or Fax completed from by the FIRST of EACH MONTH to Judy Smith, Recall Coordinator, at: jsmith@cpsc.gov or 301-504-0359. If you have questions, contact your Compliance Officer.

Updated 10/2015

CPSC Monthly Progress Report for Corrective Action Plans (CAP)

Case Number: RP 190048

Reporting Dates	2/1/2020 to 2/30/2020	Compliance Officer:	Sheela Kadambi
Recalling Firm:	SRAM, LLC	Product:	SRAM iMotion 3 internal gear hubs

I) PRODUCTS CORRECTED BY FIRM AS APPLICABLE UNDER CAP			
Location of Products	Total Products Affected by Recall	Corrections this Reporting Period	Total Cumulative Corrections for Recall
With Manufacturer:	(b)(4); (b)(3):CPSA Section 6(a)		
With Distributor: **			
With Retailers:			
With Consumers:			
TOTAL:	6993	(b)(4); (b)(3):CPSA Section 6(a)	
(b)(4); (b)(3):CPSA Section 6(a)			
II) INCIDENT UPDATE			
	Total incidents Reported this Period that Occurred <u>Before</u> the Recall	Total Incidents Reported this Period that Occurred <u>After</u> the Recall	
Incidents	(b)(4); (b)(3):CPSA Section 6(a)		
Injuries			
Deaths			

III) Notifications Made by Firm and Consumer Responses as Applicable under CAP			
How many consumers did you notify this reporting period by:			
Phone:	#		
Email:	#		
Regular Mail:	#		
How many consumers contacted your Firm this reporting period about the recall as a result of any notification?			
Phone:	#	(b)(4); (b)(3):CPSA Section 6(a)	
Email:	#		
Regular Mail:	#		
Registration Cards:	#		
Is the recall currently posted on your homepage? YES ___ If no, explain: _____			
How many website hits did your Firm have this reporting period for this recall? # (b)(4); (b)(3):CPSA			
As applicable under your CAP, how many times in this reporting period did your Firm post the recall notice on the following:			
Facebook:	#	# of shares:	# of Likes:
Twitter:	#	# of Re-Tweets:	# of Twitter Followers:
Other:	#	Explain:	(b)(4); (b)(3):CPSA
Ad Placements:	#	Explain:	
Recalling companies are encouraged to monitor on line re-sale, auction, and wholesale websites. If monitored, did you find the recall product on any sites <input type="checkbox"/> Yes / <input type="checkbox"/> No - Describe action taken: _____			

NOTE: Email or Fax completed from by the FIRST of EACH MONTH to Judy Smith, Recall Coordinator, at: jsmith@cpsc.gov or 301-504-0359. If you have questions, contact your Compliance Officer.

Updated 10/2015

CPSC Monthly Progress Report for Corrective Action Plans (CAP)

Case Number: RP 190048

Reporting Dates	3/1/2020 to 3/31/2020	Compliance Officer:	Sheela Kadambi
Recalling Firm:	SRAM, LLC	Product:	SRAM iMotion 3 internal gear hubs

I) PRODUCTS CORRECTED BY FIRM AS APPLICABLE UNDER CAP			
Location of Products	Total Products Affected by Recall	Corrections this Reporting Period	Total Cumulative Corrections for Recall
With Manufacturer:	(b)(4); (b)(3):CPSA Section 6(a)		
With Distributor: **			
With Retailers:			
With Consumers:			
TOTAL:	6993	(b)(4); (b)(3):CPSA Section 6(a)	
(b)(4); (b)(3):CPSA Section 6(a)			
II) INCIDENT UPDATE			
	Total incidents Reported this Period that Occurred <u>Before</u> the Recall	Total Incidents Reported this Period that Occurred <u>After</u> the Recall	
Incidents	(b)(4); (b)(3):CPSA Section 6(a)		
Injuries			
Deaths			

III) Notifications Made by Firm and Consumer Responses as Applicable under CAP			
How many consumers did you notify this reporting period by:			
Phone:	#	_____	
Email:	#	_____	
Regular Mail:	#	_____	
How many consumers contacted your Firm this reporting period about the recall as a result of any notification?			
Phone:	#	(b)(4); (b)(3):CPSA Section 6(a)	
Email:	#	_____	
Regular Mail:	#	_____	
Registration Cards:	#	_____	
Is the recall currently posted on your homepage? YES ___ If no, explain: _____			
How many website hits did your Firm have this reporting period for this recall? # (b)(4); (b)(3):CPSA			
As applicable under your CAP, how many times in this reporting period did your Firm post the recall notice on the following:			
Facebook:	#	# of shares: _____	# of Likes: _____
Twitter:	#	# of Re-Tweets: _____	# of Twitter Followers: (b)(4); (b)(3):CPSA
Other:	#	Explain: _____	
Ad Placements:	#	Explain: _____	
Recalling companies are encouraged to monitor on line re-sale, auction, and wholesale websites. If monitored, did you find the recall product on any sites <input type="checkbox"/> Yes / <input type="checkbox"/> No - Describe action taken: _____			

NOTE: Email or Fax completed from by the FIRST of EACH MONTH to Judy Smith, Recall Coordinator, at: jsmith@cpsc.gov or 301-504-0359. If you have questions, contact your Compliance Officer.

Updated 10/2015

CPSC Monthly Progress Report for Corrective Action Plans (CAP)

Case Number: RP 190048

Reporting Dates	4/1/2020 to 4/30/2020	Compliance Officer:	Sheela Kadambi
Recalling Firm:	SRAM, LLC	Product:	SRAM iMotion 3 internal gear hubs

I) PRODUCTS CORRECTED BY FIRM AS APPLICABLE UNDER CAP			
Location of Products	Total Products Affected by Recall	Corrections this Reporting Period	Total Cumulative Corrections for Recall
With Manufacturer:	(b)(4); (b)(3):CPSA Section 6(a)		
With Distributor: **			
With Retailers:			
With Consumers:			
TOTAL:	6993	(b)(4); (b)(3):CPSA Section 6(a)	
(b)(4); (b)(3):CPSA Section 6(a)			
II) INCIDENT UPDATE			
	Total incidents Reported this Period that Occurred <u>Before</u> the Recall	Total Incidents Reported this Period that Occurred <u>After</u> the Recall	
Incidents	(b)(4); (b)(3):CPSA Section 6(a)		
Injuries			
Deaths			

III) Notifications Made by Firm and Consumer Responses as Applicable under CAP			
How many consumers did you notify this reporting period by:			
Phone:	#		
Email:	#		
Regular Mail:	#		
How many consumers contacted your Firm this reporting period about the recall as a result of any notification?			
Phone:	#	(b)(4); (b)(3):CPSA Section 6(a)	
Email:	#		
Regular Mail:	#		
Registration Cards:	#		
Is the recall currently posted on your homepage? YES ___ If no, explain: _____			
How many website hits did your Firm have this reporting period for this recall? # (b)(4); (b)(3):CPSA Section 6(a)			
As applicable under your CAP, how many times in this reporting period did your Firm post the recall notice on the following:			
Facebook:	#	# of shares:	# of Likes:
Twitter:	#	# of Re-Tweets:	# of Twitter Followers:
Other:	#	Explain: (b)(4); (b)(3):CPSA Section 6(a)	
Ad Placements:	#	Explain: _____	
Recalling companies are encouraged to monitor on line re-sale, auction, and wholesale websites. If monitored, did you find the recall product on any sites <input type="checkbox"/> Yes / <input type="checkbox"/> No - Describe action taken: _____			

NOTE: Email or Fax completed from by the FIRST of EACH MONTH to Judy Smith, Recall Coordinator, at: jsmith@cpsc.gov or 301-504-0359. If you have questions, contact your Compliance Officer.

Updated 10/2015

CPSC Monthly Progress Report for Corrective Action Plans (CAP)

Case Number: RP 190048

Reporting Dates	5/1/2020 to 5/31/2020	Compliance Officer:	Sheela Kadambi
Recalling Firm:	SRAM, LLC	Product:	SRAM iMotion 3 internal gear hubs

I) PRODUCTS CORRECTED BY FIRM AS APPLICABLE UNDER CAP			
Location of Products	Total Products Affected by Recall	Corrections this Reporting Period	Total Cumulative Corrections for Recall
With Manufacturer:	(b)(4); (b)(3):CPSA Section 6(a)		
With Distributor: **			
With Retailers:			
With Consumers:			
TOTAL:	6993	(b)(4); (b)(3):CPSA Section 6(a)	
(b)(4); (b)(3):CPSA Section 6(a)			
II) INCIDENT UPDATE			
	Total incidents Reported this Period that Occurred <u>Before</u> the Recall	Total Incidents Reported this Period that Occurred <u>After</u> the Recall	
Incidents	(b)(4); (b)(3):CPSA Section 6(a)		
Injuries			
Deaths			

III) Notifications Made by Firm and Consumer Responses as Applicable under CAP			
How many consumers did you notify this reporting period by:			
Phone:	#		
Email:	#		
Regular Mail:	#		
How many consumers contacted your Firm this reporting period about the recall as a result of any notification?			
Phone:	#	(b)(4); (b)(3):CPSA Section 6(a)	
Email:	#		
Regular Mail:	#		
Registration Cards:	#		
Is the recall currently posted on your homepage? YES ___ If no, explain: _____			
How many website hits did your Firm have this reporting period for this recall? # (b)(4); (b)(3):CPSA Section 6(a)			
As applicable under your CAP, how many times in this reporting period did your Firm post the recall notice on the following:			
Facebook:	#	# of shares:	# of Likes:
Twitter:	#	# of Re-Tweets:	# of Twitter Followers:
Other:	#	Explain:	(b)(4); (b)(3):CPSA Section 6(a)
Ad Placements:	#	Explain:	
Recalling companies are encouraged to monitor on line re-sale, auction, and wholesale websites. If monitored, did you find the recall product on any sites <input type="checkbox"/> Yes / <input type="checkbox"/> No - Describe action taken: _____			

NOTE: Email or Fax completed from by the FIRST of EACH MONTH to Judy Smith, Recall Coordinator, at: jsmith@cpsc.gov or 301-504-0359. If you have questions, contact your Compliance Officer.

Updated 10/2015

Withheld pursuant to exemption

(b)(5)

of the Freedom of Information Act

Withheld pursuant to exemption

(b)(5)

of the Freedom of Information Act



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

Sheela Kadambi
Compliance Officer
Resources Management and Fast Track Division
Office of Compliance and Field Operations

Tel: 301-504-7561
Fax: 301-504-0359
Email: SKadambi@cpsc.gov

July 30, 2020

Email: Ejones@mayerbrown.com

Erika Jones, Esquire
Mayer Brown LLP
1999 K Street, NW
Washington, DC 20006

Re: CPSC File No. RP190048
SRAM LLC
i-Motion 3, Three-Speed Internal Gear Hub
with a Coaster Brake, For Bicycles:

Dear Ms. Jones:

The U.S. Consumer Product Safety Commission (Commission) staff has reviewed SRAM LLC (Firm's) progress in carrying out the corrective action plan (CAP) in the above-referenced matter. The Office of Compliance and Field Operations has determined that no further monitoring on the part of the staff is warranted. Therefore, acting under delegation from the Commission, the staff has closed this case with respect to the Firm's CAP. The Commission staff will reopen this case, however, if it finds that the Firm's corrective actions do not adequately protect the public from the risk of injury presented by this product.

The Firm has a continuing obligation to inform the Office of Compliance and Field Operations of defects associated with the Subject Products which could create a substantial product hazard and of information that reasonably supports the conclusion that the Subject Products create an unreasonable risk of serious injury or death. If the Firm receives or learns of any information complaints, claims, incidents, or injuries that the Firm did not report, or other information affecting the scope, prevalence, or seriousness of the reported problem, issue, or potential defect or hazard, the Firm must report that information to the Office of Compliance and Field Operations.

The staff requests that the Firm continue to implement its CAP until as many products as possible have been removed from the marketplace. Please continue to maintain your toll-free recall number as a means for consumers to reach the Firm about the recall. Should the Firm

decide to change or discontinue the toll-free number, we request that the Firm immediately notify the Office of Compliance and Field Operations and provide a new recall contact number for the Firm. This information will be maintained by the Commission staff and provided to consumers and others seeking information on the recall.

If the Firm receives information that might indicate that its corrective actions are not satisfactory in eliminating the risk of injury or the potential defect or hazard, or that the effectiveness of the CAP was less than what had been reported, it must immediately report that information to the Office of Compliance and Field Operations. Under section 19(a)(2)(B) of the Consumer Product Safety Act, 15 U.S.C. § 2068(a)(2)(B), it is unlawful to sell, offer for sale, manufacture for sale, distribute in commerce, or import into the United States a product that is covered by a manufacturer's CAP created in consultation with, and publicized by, the Commission.

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in black ink, reading "Sheela Kadambi". The signature is written in a cursive, flowing style.

Sheela Kadambi
Compliance Officer
Resources Management and Fast Track Division