



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

July 21, 2021

Mr. Greg Knott
Director, Industry Affairs
Outdoor Power Equipment Institute (OPEI)
341 South Patrick Street
Alexandria, VA 22314

Mr. Alex Berger
General Counsel
Specialty Vehicle Institute of America (SVIA) and
Recreational Off-Highway Vehicle Association (ROHVA)
2-Jenner Suite 150
Irvine, CA 92618

Subject: Continued Collaboration on Off-Highway Vehicle (OHV) Fire and Debris Penetration
Voluntary Standards Requirements

Dear Mr. Knott and Mr. Berger:

On May 11, 2021, an advance notice of proposed rulemaking (ANPR)¹ for OHV Fire and Debris Penetration Hazards was published in the *Federal Register* (86 FR 25817).² Although the ANPR formally started a rulemaking process, CPSC staff³ continues to support developing effective voluntary standards to address these issues. Moreover, staff is interested in any new developments since OPEI's last voluntary standards meeting, held on September 9, 2020. At that meeting, OPEI indicated its members were examining the various fuel system requirements from

¹ Advanced Notice of Proposed Rulemaking (ANPR) for Off-Highway Vehicle Fire and Debris Penetration Hazards, May 11, 2021. Posted on www.regulations.gov. Docket CPSC-2021-0014 URL: <https://www.regulations.gov/document/CPSC-2021-0014-0001>. Staff Briefing Package: <https://www.cpsc.gov/s3fs-public/Advance-Notice-of-Proposed-Rulemaking-Regarding-Off-Highway-Vehicles.pdf>

² Federal Register, Volume 86, Number 89, Tuesday, May 11, 2021, Proposed Rules; Web URL: <https://www.govinfo.gov/content/pkg/FR-2021-05-11/pdf/2021-09881.pdf>

³ These comments are those of the CPSC staff, and have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

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other standards and may possibly present proposals pertaining to fuel system requirements in the future. ROHVA and SVIA each also indicated its members were open to another meeting to continue discussions with CPSC staff. CPSC staff would like to schedule a follow-up meeting to continue discussions on potential requirements to address fire hazards.

Additionally, CPSC staff requests meeting with you and your organizations to discuss developing performance requirements to address debris-penetration hazards associated with recreational off-highway vehicles (ROVs) and utility vehicles (UTVs).

With the COVID-19 outlook improving, CPSC staff looks forward to meeting with you and your organizations in-person to discuss OHV fire and debris-penetration hazards. If an in-person meeting is not possible, we can meet virtually.

We look forward to continuing our collaboration with you and your organizations to address OHV fire and debris-penetration hazards. We will reach out to you to schedule the earliest and most convenient date and location to meet that is agreeable for OPEI, ROHVA, SVIA, and CPSC staff.

Sincerely,

Han Lim,
Program Manager, Mechanical Hazards
Division of Mechanical and Combustion Engineering
Directorate for Engineering Sciences

cc: Jacqueline Campbell, CPSC Voluntary Standards Coordinator