October 12, 2017

Greg Knott
Director, Industry Affairs
Outdoor Power Equipment Institute
341 South Patrick Street
Alexandria, VA 22314

Dear Mr. Knott:

This letter responds to your request for the canvass review of the American National Standards Institute (ANSI) and Outdoor Power Equipment Institute’s (OPEI) standard ANSI/OPEI B71.10 – 201X – Standard for Ground Supported Outdoor Power Equipment – Gasoline Fuel Systems, hereafter referred to as “B71.10.” CPSC staff has reviewed the draft B71.10 and completed the ballot sheet.

The list of proposed changes to the B71.10 is impressive and substantial. CPSC staff is confident that the addition of requirements for fuel filters, vent grommets, fuel shut-off valves, impact tests, ultraviolet (UV) light exposure tests, ozone exposure tests, and test sample conditioning to cold environments will reduce the likelihood of incidents and recalls associated with outdoor ground-supported, gasoline-powered equipment (OGSGPE) fuel leaks. CPSC staff believes the proposed requirements will represent the fuel system components better as they are used in the field.

CPSC staff appreciates the opportunity to comment on the latest draft of the B71.10. As CPSC staff has done in the past B71.10 ballots, CPSC staff abstains with comments. For your consideration, CPSC staff identified one typographical error, which is shown on the requested comment form.

CPSC staff sincerely commends your leadership and the B71.10 committee’s significant contributions to help reduce the risk of fuel leaks from OSGSPEs.

Sincerely,

Han Lim,
Mechanical Engineer
Directorate for Engineering Sciences, Mechanical and Combustion Engineering Division (ESMC)

cc: Patricia Edwards, CPSC Voluntary Standards Coordinator

Enclosures (2): Ballot Sheet; Editorial Comment Form for the B71.10 standard text
Ballot for OPEI B71.10-201X (Third Edition)
Standard for Off-Road Ground-Supported Outdoor Power Equipment
Gasoline Fuel Systems – Safety Specifications

Letter ballot for 30-day review of OPEI B71.10-201X (third edition), Standard for Off-Road Ground-Supported Outdoor Power Equipment Gasoline Fuel Systems – Safety Specifications draft revision. Please check the appropriate box:

☐ Affirmative

☐ Affirmative with comment(s) (Please use the supplied response form to submit your comment(s).)

☐ Negative with reason(s) (The reason for the negative vote shall be given and, if possible, should include specific wording or actions that would resolve the objection. Please use the supplied response form to submit your negative reason(s).)

☒ Abstain with reason(s)

☐ I no longer wish to be a voting member.

Reason for Abstaining:

While CPSC staff can vote with Office of Executive Director approval, CPSC staff in this instance has not chosen to vote. Rather, CPSC staff has chosen to abstain with written comments (see the attached letter).

Signed: __________________________________________________________

Name (print legibly please): ___Han Lim_______________________________

Title: ___Mechanical Engineer________________________________________

Company Name: __US Consumer Product Safety Commission_______________

Address: _____5 Research Place Rockville, MD 20850_____________________

Tel: _301-987-2327_________________ Fax: ___________________________

Email: _____hlim@cpsc.gov_________________________________________

Please return to OPEI by Friday October 13, 2017 (email, fax, or regular mail) to:

Greg Knott
Vice President, Regulatory Affairs
Outdoor Power Equipment Institute (OPEI)
341 South Patrick Street
Alexandria, VA 22314
gknott@opei.org
Fax: 703-549-7604
The first comment below is an example of how the form should be completed.

Name: ____________________ Han Lim ____________________________________________
Date: _________________10-1-2017________________________________

<table>
<thead>
<tr>
<th>CN¹</th>
<th>Clause No./Subclause No./Annex (e.g. 3.1)</th>
<th>Paragraph/Figure/Table/Note (e.g. Table 1)</th>
<th>Type of comment²</th>
<th>Language as Written</th>
<th>Suggested Revised Language</th>
<th>Rationale (justification for addition, deletion, objection, or revision)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Han Lim, CPSC Staff</td>
<td>3.4 Impact Tests</td>
<td>Paragraph 1</td>
<td>Ed</td>
<td>“Judgements made consistent with generally accepted scientific and engineering principals and all available relevant information.”</td>
<td>The word “principals” should be spelled “principles.”</td>
<td>Typographical error</td>
</tr>
</tbody>
</table>

OPEI B71.10-201X Response Form


Document: B71.10-201X 1st Canvass Response Form 170905.xls