



October 5, 2022

Mr. Ken Glaser  
Director, Special Projects  
Specialty Vehicle Institute of America (SVIA)  
2 Jenner, Suite 150  
Irvine, CA 92618

Subject: CPSC Staff<sup>1</sup> Comments on the American National Standard for Four Wheel All-Terrain Vehicles (ANSI/SVIA-1-202x) Draft Performance Requirements for Fire Hazards

Dear Mr. Glaser:

This letter responds to your email of September 8, 2022, in which you included a copy of the ANSI/SVIA-1-202x draft performance requirements to address fire hazards associated with all-terrain vehicles (ATVs) and a canvass ballot vote sheet.

Enclosed with this letter are:

- CPSC Staff's Canvass Ballot Vote Sheet
- CPSC Staff Comments on the Draft ANSI/SVIA-1-202x Performance Requirements

CPSC staff appreciates SVIA's efforts to develop these proposed fire hazard requirements. Enclosure 2 contains CPSC staff's comments on the draft SVIA-1 standard.

If you have any questions or comments regarding the enclosures, please do not hesitate to contact me. We look forward to collaborating with you and your members as we continue to make progress in developing standard performance requirements that will reduce ATV fire hazards.

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<sup>1</sup> 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.

Sincerely,

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

cc: Jacqueline Campbell, CPSC Voluntary Standards Coordinator

Enclosure(s):

- (1) CPSC Staff's Canvass Ballot Vote Sheet
- (2) CPSC Staff Comments on the Draft ANSI/SVIA-1-202x Performance Requirements

ENCLOSURE 1:

CPSC Staff's Canvass Ballot Vote Sheet

## Canvass Letter Ballot

Ballot Closes 10-10-22

Regarding the proposed ANSI/SVIA 1-202X standard dated 9/8/22, I vote to (mark only one)

Affirmative	_____
Affirmative with comment	_____
Negative with reasons*	_____
Abstain	_____X_____

**\*Please note that negative votes must be accompanied by comments related to the proposal and that votes unaccompanied by such comments will be recorded as “negative without comments” without further notice to the voter. An abstention should be accompanied by reasons for the abstention.**

**Supporting statements:** Please attach additional pages as necessary.

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CPSC staff has chosen to abstain with written comments (please see the attached letter).\_\_\_\_\_

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10/5/2022

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Signature:

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Date:

Please update any information below

Name: Han Lim

Organization: U.S. Consumer Product Safety Commission (CPSC)

Phone: 301-987-2327

Return to: Ken Glaser, Director, Special Projects  
Specialty Vehicle Institute of America  
2 Jenner, Suite 150  
Irvine, CA 92618

Phone (949) 727-3727 x3011

Fax: (949) 727-4216

Email: [kglaser@svia.org](mailto:kglaser@svia.org)

ENCLOSURE 2:

CPSC Staff Comments on the Draft  
ANSI/SVIA-1-202x Performance Requirements

## CPSC Staff Comments on the Draft ANSI/SVIA-1-202x Standard

Section Number	Type of Comment	Comment	Recommended Change
12.6.1 (b)	Technical	CPSC staff recommends testing hot surfaces under the most stringent test conditions.	Following warm-up, operate the vehicle continuously in circular / down and back manner maintaining a vehicle speed of 32 +3/-0 km/h (20 +2/-0 mph) or 50% of the maximum speed +3/-0 km/h (+2/-0 mph) as determined in Section 5, whichever is <del>lower</del> <b>more stringent</b> , for 30 minutes.
12.6.2 (b)	Technical	CPSC staff recommends testing hot surfaces under the most stringent test conditions.	Following warm-up, accelerate the vehicle in a straight line to 32 +3/-0 km/h (20 +2/-0 mph) or 50% of the maximum speed +3/-0 km/h (+2/-0 mph) as determined in Section 5, whichever is <del>lower</del> <b>more stringent</b> .
13.7 and 13.8	General/ Technical	Multiple subsections of 13.7 and 13.8 have fuel tank structural integrity requirements that do not explicitly illustrate how rollover containment requirements are satisfied.	Please review these sections and separate the fuel tank structural integrity and rollover containment requirements.
13.11	Editorial	Fluoroelastomer was misspelled.	Exemption: <del>Flouroelastomer</del> <b>Fluoroelastomer</b> ("FKM") fuel system components satisfy the requirements of this standard without testing in accordance with this section.
13.12	Editorial	Fluoroelastomer was misspelled.	Exemption: <del>Flouroelastomer</del> <b>Fluoroelastomer</b> ("FKM") fuel system components satisfy the requirements of this standard without testing in accordance with this section.
N/A	General	CPSC staff recommends the committee examine paragraphs 5.3.1 to 5.3.5 (Electrical Requirements) of BS EN 16990-2020 <i>British Standard for Light Motorized Vehicles For The Transportation Of Persons And Goods And Related Facilities And Not Subject To Type-Approval For On-Road Use - Side By Side Vehicles - Safety Requirements And Test Methods</i> to determine their applicability to U.S. ATVs. These paragraphs cover requirements for grounding, over-current protection, wiring harnesses, and batteries.	
N/A	General	CPSC staff recommends adding a rationale section to explain the reasons for including each new section and what hazards they would potentially address.	