

ZIGGY LSV Inc.
750 Port America Pl #100
Grapevine, TX 76051

September 13, 2022

Regulatory Enforcement Division
Office of Compliance and Field Operations
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814

RE: ATV Action Plan of ZIGGY LSV INC.

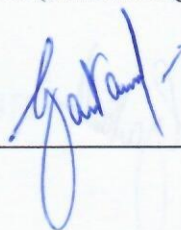
This ATV Action Plan is submitted on behalf of ZIGGY LSV Inc. "Ziggy", which intends to become a manufacturer, importer, and distributor of All-Terrain Vehicles ("ATVs") in the United States. Ziggy is fully committed to the goal of reducing ATV-related accidents. Ziggy is implementing policies in accordance with the rules set forth by Section 42 of the Consumer Product Safety Act ("CPSA"), 15 U.S.C. § 2089, and 16 C.F.R. part 1420. The actions outlined below are part of our continuing effort to promote safe and responsible use of our ATVs.

Ziggy agrees that this Action Plan is for its sole use and that Ziggy will not allow third parties to manufacture, import, or distribute ATVs under this Action Plan.

As detailed below, and in consideration for the Commission's acceptance of this Action Plan, Ziggy's parent company, RK GLOBALS FZE ("RK Globals"), hereby guarantees that it will provide all funding and financial support necessary to ensure that Ziggy complies with the requirements of this Action Plan, and further guarantees to provide all funds necessary if Ziggy is subject to any enforcement, civil penalty, or remedial action for a violation of this Action Plan or for violations of any other statutes or regulations enforced by the Commission.

Age Recommendations

Ziggy will only recommend, market, advertise and sell ATVs in accordance with the age category/speed guidelines specified in Section 6 of the ANSI/SVIA 1-2017 Standard for ATVs and any successor standards adopted by the CPSC for ATVs (the "ATV Standard"). Ziggy will not recommend, market, or sell adult-size ATVs for the use of persons under the age of 16. Furthermore, Ziggy will not recommend, market, advertise, or sell Y-6+ youth-sized ATVs for the use of persons under 6 years of age; Y-10+ youth-sized ATVs for the use of persons under 10 years of age; or Y-12+ youth-sized ATVs for the use of persons under 12 years of age. Additionally, Ziggy will ensure that its ATVs are appropriately age graded for the intended user population and will consider relevant anthropometric data (such as height and weight of the intended rider) when age grading its ATVs.



RK GLOBALS FZE
DUBAI, UAE



World class electric mobility solutions!

Ziggy will ensure that its dealers comply with these above-listed requirements and only recommend, market, advertise and sell ATVs in accordance with the age category/speed guidelines specified in Section 6 of the ATV Standard.

Dealer Education and Monitoring

1. Scope and Components of Monitoring Program

Ziggy requires that its dealers—which includes, but is not limited to, both brick-and-mortar and e-commerce dealers—verify the intended ATV rider's age prior to selling that rider or his/her parent or guardian an ATV. Ziggy's warranty registration cards require the submission of the intended rider's name and date of birth to ensure that dealers do not sell Ziggy ATVs to under-aged riders.

Ziggy will ensure that its dealers comply with all the requirements of this Action Plan, including:

- The user age recommendation requirements of the ATV Standard;
- The requirements related to notifying ATV purchasers about the availability and importance of free, hands-on ATV training and the monetary incentive for taking such training; and
- The requirements relating to providing the ATV Hang Tag, the ATV Owner's Manual, the ATV Safety Video, and the ATV Safety Alert to ATV purchasers at the point of purchase.

Ziggy will conduct on-site inspections of each of its authorized ATV dealers at least twice a year, with a minimum of 50 on-site inspections per year (which includes 25 visits per reporting period as described in Section 4 below), by means of independent, undercover investigators (also known as "secret shoppers") to ensure that these dealers comply with the above-listed requirements and other safety-related practices during sales or promotional functions. The dealers who will be subject to undercover monitoring will be randomly selected annually. Ziggy will also modify the visitation criteria of its field personnel so that inspecting for dealer compliance with the above-listed requirements becomes a normal function of routine dealer visits.

2. Notice and Training Program

Within fifteen (15) days of learning of a dealer's non-compliance with the above-listed requirements from the CPSC, by one of Ziggy's independent investigators, or any other party, Ziggy will:

- notify the dealer of its non-compliance;
- arrange an undercover, on-site inspection of the dealer to determine whether the dealer is complying with the above-listed requirements;
- inform the dealer of the operative facts reported by CPSC, the independent investigator, or the other party (such as the name of the salesperson and the model(s) of the ATV(s) allegedly recommended during the inspection);
- initiate the notice and training procedures outlined in this section; and
- demand a cure of the reported violation(s)

RK GLOBALS FZE
DUBAI, UAE

3. Follow-up Monitoring and Enforcement for Non-Compliance

Within thirty (30) days after notifying the dealer of its non-compliance, Ziggy will provide on-site training to all dealership personnel who are involved in the sale of ATVs. The training will include, but not be limited to, information concerning the above-listed requirements, the need for compliance with them, and the potential enforcement actions (including termination and non-renewal of the dealership agreement) that the dealer may incur if non-compliance continues. A record of the training effort will be made by Ziggy and provided to CPSC staff during bi-annual reporting (as described in the "Reporting" section below).

Within sixty (60) days after completing the above-referenced training for a non-compliant dealer, Ziggy will conduct an undercover, on-site, follow-up inspection of the dealer to determine whether the dealer is complying with the above-listed requirements. If this follow-up inspection reveals evidence of continuing violations, Ziggy will take remedial action against the dealer, up to and including possible termination or non-renewal of the dealership agreement with Ziggy.

If Ziggy elects not to terminate the dealer's contract, remedial actions will at a minimum include additional undercover on-site inspections of the dealer. If these additional inspections reveal an additional violation, Ziggy will terminate or decline to renew the dealer's contract. In each instance, Ziggy will inform the CPSC Office of Compliance and Field Operations in advance of any remedial action or disposition, and it will provide the CPSC staff a reasonable opportunity to comment on such action or disposition before it occurs.

4. Reporting

Ziggy will provide a comprehensive report of the results of its dealer monitoring program to CPSC staff on a bi-annual basis, with reports due to CPSC's Office of Compliance and Field Operations on February 1 and August 1 of each year. These reports will include a list of inspected dealerships, the date of inspection, and all training or enforcement actions taken by Ziggy, along with dates of all follow up activities and remedial actions. Ziggy will maintain a list of all dealerships inspected each year in spreadsheet format and this spreadsheet shall be provided promptly to CPSC staff upon its request. CPSC staff will maintain the confidentiality of these reports in accordance with applicable laws. CPSC staff also reserves the right to request additional information from Ziggy regarding the results of Ziggy's dealer monitoring program.

5. Notice to Dealers

Ziggy will notify its dealers in writing of its dealer monitoring program within fifteen (15) days of the effective date of this Action Plan. The notice will remind dealers of their ongoing obligations to comply with the above-listed requirements and the consequences of non-compliance, including, but not limited to, the assessment of administrative costs for Ziggy's monitoring of the dealer and possible termination or non-renewal of the dealership agreement. Ziggy will provide CPSC's Office of Compliance and Field Operations an advance copy of the notice.



RK GLOBALS FZE
DUBAI, UAE



World class electric mobility solutions!

Training Program

Ziggy will offer each ATV buyer, and age appropriate members of the buyer's immediate family, an opportunity to take a free hands-on ATV training through the All-Terrain Vehicle Safety Institute ("ASI"). Ziggy will pay ASI directly for the training and will offer a full refund of any training fees associated with attending an ASI Program.

After completion of the ASI training, the rider will qualify for an incentive of \$100. The \$100 incentive for training will include at least \$50 in cash, with the balance offered (at the consumer's choice) as a rebate for already purchased safety equipment or a credit toward the purchase of new safety equipment.

The purchaser will be informed of the free training offer several different ways. Inside the package containing the instruction manual will be a Free Training Certificate. To help ensure that the customer not only has the certificate but also is aware of the free training offer, the salesperson and the customer will be required to fill out an online Warranty Registration form before the ATV leaves the dealer. One of the items which must be checked off by the customer is an acknowledgement that they have received the offer of free training. In addition, the free training offer will be set out on Ziggy's website and in brochures available from dealers.

Ziggy will also require warranty information to be completed online by Ziggy's dealers at the time of purchase. Within two weeks of purchase, Ziggy will send by email and regular mail a reminder card of the training offer and incentives to the purchaser.

The hands-on training offer will be in addition to training information provided to the consumer in the form of owners' manuals, hang tags, warning labels, safety alerts, the safety video, and other media. Ziggy will provide information about the number of completed trainings and incentives distributed in its bi-annual report.

CPSC and Ziggy will review and evaluate Ziggy's training program if participation is below 25% of sales during any reporting period, and will assess whether changes should be made to increase the efficacy of the training program.

Information/Education Program

Ziggy will require its dealers to implement an information/education effort to communicate appropriate age recommendations, the importance of wearing safety gear, and other safety-related information to consumers. The materials and information will be based on all publications produced by the Specialty Vehicle Institute of America ("SVIA") and the ATV Safety Institute ("ASI"). The materials will provide safety information and warn children under the age of sixteen of the risks and dangers of operating adult-sized ATVs.

Ziggy will spend at least \$25,000 per year on its Information and Education Program.

RK GLOBALS FZE
DUBAI, UAE



World class electric mobility solutions!

Ziggy's website will provide online access and the ability for consumers to communicate with Ziggy and others as well as download safety and education information. The website will provide appropriate warnings against the improper use of ATVs and explain the risks associated with ATV use. Users will be able to print the valuable safety and education information for personal use or to share with others.

Ziggy will include its website address on all Owner's manuals and printed safety messages. The website address and safety message will be included in Retail Print Circulars published by Ziggy ATV dealers.

Ziggy will sponsor a safety ad campaign, including web advertising and post advertising in major off-road publications. The ads will promote safe riding and age recommendations. The ads will continuously run throughout the year.

Ziggy will provide a video with every ATV sold. The video will feature safety themes and messages consistent with the 1988 ATV Consent Decrees.

Ziggy will distribute safety reminders by email and direct mail within a few weeks of retail purchases. The reminders will include the safety messages, information about the free ATV training, and incentives for completing that training

Ziggy will also supply an Ziggy ATV safety poster for all Ziggy dealers. The standalone in-store poster will deliver a message consistent with the general warning label and age restriction warning label. The poster will contain a pamphlet containing safety information and directions to the Ziggy ATV Safety website. The poster and pamphlet will stress personal and family responsibility in the proper use of ATVs. Ziggy will require authorized dealers to display SVIA and ASI posters and educational materials at both in-store locations and e-commerce retail sites.

Ziggy will utilize social media platforms (including Facebook, Instagram, and Twitter) to actively promote safe riding and age recommendations. Ziggy's social media postings shall be consistent with any applicable requirements listed in this Action Plan.

Safety Alerts

Ziggy will provide to dealers for dissemination to each buyer at the point of purchase a "Safety Alert" containing the same substantive safety information as the Safety Alert at section H.3.b(4)(c) and Appendix J of the 1988 ATV Consent Decrees, including death and injury statistics for ATVs, safety rules, age recommendations, and information concerning the availability of ATV training including details of the incentive program provided by Ziggy.

Owner's Manual

Ziggy owner's manual will conform to section 4.21 of the ATV Standard. Ziggy's toll-free number and website will be printed in all Owner's manuals.

RK GLOBALS FZE
DUBAI, UAE



World class electric mobility solutions!

Warning Labels

Ziggy will use all labels as required by Section 4.23 of the ATV Standard which includes general age recommendation, passenger, tire pressure, and overloading labels and will ensure that all labels conform to the ATV Standard.

Hang Tags

Ziggy will provide hang tags for every ATV distributed. All hang tags will comply with the requirements of section 4.24 of the ATV Standard and will include age recommendations, vehicle category, training availability, and safety messages. Ziggy will ensure that retailers display the hang tags on new ATVs, and this will be part of Ziggy's unannounced audits of retailers.

ATV Safety Video

Ziggy will provide to all purchasers of a Ziggy ATV a safety video as described in Section H.3.b(4)(b) and paragraphs II.A and II.C of Appendix I of the 1988 ATV Consent Decrees. The video or how to access the video will be included in the shipping carton when the unit is packaged during production. The video will contain safety messages in accordance with safety messages found on the general ATV warning label. The video or access to the video will be given to the consumer by the dealer during the sales process. Ziggy will also place a link on the Ziggy website to this safety video.

Toll Free Telephone Hotline

Ziggy will provide a toll free, 24-hour hotline to respond to consumer inquiries as described at Section H.4 of the 1988 ATV Consent Decrees. Agents will be trained to provide safety and training information, including age recommendations. Ziggy further agrees the hotline service will offer to send, free of charge, to every person who calls and requests, copies of the ATV Safety Guide produced for in-store distribution. Ziggy's toll-free number will be printed in all owner manuals, Ziggy ATV websites, and other promotional materials.

Advertising

Ziggy's advertisements and promotional materials will show safety information and will depict ATVs in a manner consistent with safe and responsible use of the product. All riders shown will be wearing helmets and full protective gear. All marketing, promotional, and advertising materials will include the substance of the safety messages that are described in Section J.1 and Appendix K of the 1988 ATV Consent Decree. There will be an age recommendation on every model of Ziggy ATV and no advertising or marketing materials should imply that teenagers or children may ride adult sized ATVs. Ziggy will ensure dealer compliance with all rules and guidelines in this Action Plan, including the advertising and marketing requirements.

RK GLOBALS FZE
DUBAI, UAE



World class electric mobility solutions!

3-Wheel ATVs

Ziggy will not manufacture, market, or sell 3-wheel ATVs.

Participation in ASI's Safety Program

Ziggy shall be a participating/member company of ASI's ATV Safety Program. If at any time the Ziggy is no longer a participating/member company of ASI's Safety Program, and therefore no longer able to access ASI's training and safety materials and services, Ziggy will cease to import and distribute ATVs in commerce until Ziggy is able to provide equal or greater materials and services as described herein and these materials and services are approved by the CPSC staff.

Voluntary Standards

Ziggy will participate in the ongoing efforts to update and revise the ATV voluntary standard. Potential technical issues identified by CPSC staff will be discussed and considered in good faith as part of those efforts. Ziggy will commit to advance ATV safety, including through future potential design and feature changes, that will improve safety.

Advance Notice of Changes

Ziggy intends to maintain the above Action Plan indefinitely. Ziggy will provide information about these activities upon receipt of reasonable requests from the CPSC. Ziggy will provide CPSC a 60-day notice of its intention to terminate or materially change any commitment under our Action Plan.

Amendment and Termination Procedures

If Commission staff determines that Ziggy's approved ATV Action Plan is no longer effective or adequate, Commission staff may take certain action, including but not limited to notifying Ziggy that its ATV Action Plan must be amended to address the effectiveness or adequacy of the plan. With that notification, Commission staff shall provide Ziggy with the text of any proposed amendment. Ziggy and Commission staff must reach agreement on the proposed amendment within 30 calendar days of the notification, unless Commission staff grants an extension for good cause. If Ziggy and Commission staff fail to reach an agreement within the designated timeframe, then Commission staff may recommend termination of the Ziggy Action Plan. Additionally, (i) if Ziggy fails to comply with the obligations of this ATV Action Plan, or (ii) if Commission staff determines that Ziggy can no longer comply with the obligations of this ATV Action Plan, or (iii) if Ziggy fails to adopt a requested amendment within the timeframe specified by staff, Commission staff, after providing Ziggy with notice and an opportunity to respond, may recommend termination of the ATV Action Plan. Ziggy may not manufacture, import, or distribute any ATV in the United States under this Action Plan after receiving written notice of such termination. Failure to cease manufacture, importation, or distribution in United States commerce of any ATV under this ATV Action Plan after receipt of notice of termination is a prohibited act under section 19(a)(1) of the CPSA, 15 U.S.C. §2068(a)(1).

RK GLOBALS FZE
DUBAI, UAE



World class electric mobility solutions!

Ziggy hereby agrees to take all of the actions to promote ATV safety set forth in this Ziggy ATV Action Plan, and further agrees to fulfill each of the undertakings set forth in this Plan. Ziggy understands that any failure to perform the actions, or fulfill the commitments set forth in the Plan may result in termination of the Plan.

Sincerely Yours,

Michael Hillman General Manager
ZIGGY LSV Inc
mikeh@ziggywheels.com

In consideration for the Commission's acceptance of this Action Plan, RK Globals, hereby guarantees that it will provide all funding and financial support necessary to ensure that Ziggy undertakes every action to promote ATV safety as set forth in this Action Plan, and further agrees to ensure that Ziggy fulfills each of the requirements set forth in this Action Plan. RK Globals further guarantees to provide all funding and financial support necessary if Ziggy is subject to any enforcement, civil penalty, or remedial actions for violations of this Action Plan, violations of Section 42 of the CPSA, or for violations of any other statutes or regulations enforced by the Commission.

If, at any time, Ziggy represents to the Commission that it does not have funds adequate to fulfill every commitment under this Action Plan, or funding to resolve any enforcement, civil penalty, or remedial actions, RK Globals agrees to provide such funding. In the event of any dispute regarding these terms or this Action Plan, RK Globals agrees to submit to the jurisdiction of the United States Courts.

Sincerely,

[Name]

[Title of RK Globals CEO/President]

RK Globals

GAUTAM JAIN

RK GLOBALS FZE
DUBAI, UAE