

26  
FILE - *from Mr. [unclear]*



U. S. CONSUMER PRODUCT SAFETY COMMISSION

WASHINGTON, D. C. 20207

MAY 2 7 1982

#298 -  
OFFICE OF THE  
GENERAL COUNSEL

*cc: [unclear] (11) & (14) jpr*

James F. Rill, Esquire  
Collier, Shannon, Rill & Scott  
Attorneys-at-Law  
1055 Thomas Jefferson Street, N.W.  
Washington, D.C. 20007

*persons*  
RESTRICTION REMOVED - re: minute  
for public release.  
Initial *jpr* Date *11/1/82*

Dear Mr. Rill:

This letter responds to your letter of March 9, 1982, in which you request a determination of whether certain Bunton and Goodall lawn mowers manufactured by the Bunton Company are consumer products and thus subject to the Safety Standard for Walk-Behind Power Lawn Mowers, 16 CFR Part 1205. The data you have submitted indicate that this mower is not a consumer product because consumers do not appear to "customarily" use it.

As you know, the term "consumer product" is defined in 15 U.S.C. § 2052(a)(1), and the term does not include "any article which is not customarily produced or distributed for sale to, or use or consumption by, or enjoyment of, a consumer." The legislative history of this section indicates that products that are not used more than occasionally by consumers are not consumer products. H.R. Rep. No. 924153, 92d. Cong., 2d. Sess. 27 (1972).

In general, we have established no specific criteria to determine whether consumers use a product more than occasionally. Instead, we review all available information relevant to a particular determination.

In the case of these Bunton and Goodall mowers, you have submitted the following data which indicate that the current use and distribution patterns of those mowers are such that these mowers do not fall within the definition of the term "consumer product":

ADVISORY OPINION

*[Handwritten signature]*

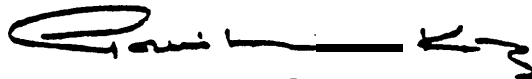
~~CONFIDENTIAL~~

1. The price ranges that you specify for these mowers are higher than usual prices of typical consumer mowers. In addition, you specify that the prices of the comparable consumer mowers manufactured by Bunton are ~~XXXXXX~~ percent lower than the Bunton and Goodall commercial mowers for which you request a determination.
2. These mowers are relatively low production items.
3. The distributors for these commercial mowers do not carry Bunton's line of consumer mowers.
4. Bunton's advertising agency places advertisements for these mowers only in publications targeted at commercial users.
5. At least ~~XXXXXX~~ percent of the production of these mowers is for commercial or overseas use.

Our technic21 staff has reviewed the information which you submitted, and no information that would contradict any of the factors mentioned above has been brought to our attention. Therefore, based on all of these factors, we reached our conclusion that, at the present time, the use and distribution patterns of these mowers are such that they are not consumer products.

We wish to stress, however, that this determination is based primarily on the information supplied by you, and, if data showing different use or distribution patterns become available, our determination could change. For example, if consumer use patterns were to change in the future so that these mowers would be used more than occasionally by consumers, they could then be considered subject to the standard.

Sincerely, -



Martin Howard Katz  
General Counsel

~~CONFIDENTIAL~~

# FILE

*[Handwritten scribble]*

THRU: Carl W. Bleusschmidt, EX-P  
Walter R. Hobby, Acting AED, Economics

April 14, 1982

William W. Zamula, ECTP

Determination as to Whether Bunton Company Mowers are Subject to the Power Mower Standard

This is in response to your request for comments on the Bunton Company's letter of March 9, 1982.

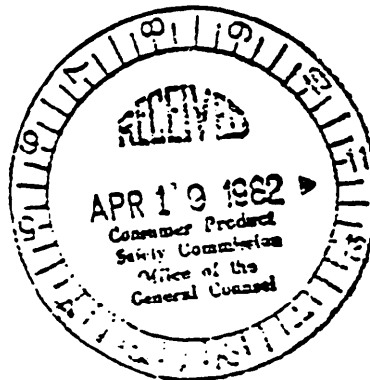
Among firms seeking exemption from the power mower rule, Bunton Company seems to us the best example we have encountered to date of a "commercial mower" manufacturer. It sells almost all its commercial mowers through distributors rather than its retailers, as does Toro, but unlike Toro, its distributors do not carry consumer mowers manufactured by Bunton. Bunton's advertising policies also show a strong orientation to the commercial user.

We, therefore, recommend a determination that the Bunton and Goodall mowers listed on page 2 of the March 9, 1982 letter are commercial mowers outside the scope of the Standard.

cc: Earleigh Ewell, OGC  
Paul Galvydis, CARM

+

Re:WTHOBBY:CCS:4/14/82



Collier, Shannon, Rill & Scott  
Chartered

Attorneys-at-Law

1055 Thomas Jefferson Street, N.W.

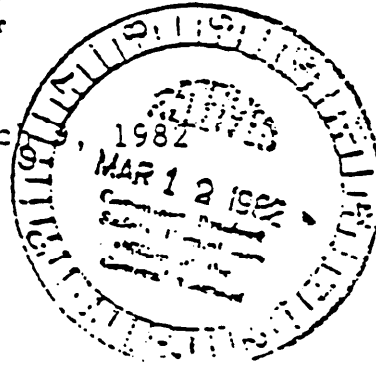
Washington, D. C. 20007

Telephone: 202: 342-8400

Writer's Direct Dial Number

(202) 342-8432

March



Margaret Freeston, Esq.  
Acting General Counsel  
Consumer Product Safety Commission  
Washington, D.C. 20207

Dear Ms. Freeston:

This letter is a request on behalf of the Bunton Company ("Bunton") for an interpretation, pursuant to 16 C.F.R. § 1000.7, of the Consumer Product Safety Act as it applies to the Commission's Safety Standard for Walk-Behind Power Lawn Mowers, 16 C.F.R. Part 1205. Bunton requests a determination whether the lawn mower herein described constitutes a "consumer product" within the meaning of the Consumer Product Safety Act, 15 U.S.C. § 2051, et seq., and of such standard.

Bunton produces two virtually identical lines of walk-behind mowers for a variety of specialized commercial applications. These two lines are Bunton and Goodall. Bunton also manufactures a separate line of mowers, intended for consumer use which bears the Tom Boy label anti complies with the new standard. The Bunton and Goodall mowers for which Bunton seeks an interpretation range from a 5.5 H.P. trimmer with a 12" cutting width, designed specifically for the maintenance of cemetery monuments and markers, to an 8 H.P., 28" width unit weighing 258 lbs., for commercial and municipal use.<sup>1/</sup> The retail prices for the mowers at issue range from \$404-457 for the 18" cut models to \$1,674-2,355 for the 28" models. Prices for comparable Tom Boy consumer models, where they exist, are 25-50% lower.

Although the Bunton mowers do not satisfy any of the exclusionary criteria set forth at 16 C.F.R. §1205.1(c), their cost, weight, limited production and specialized commercial uses indicate that they are not consumer products within the terms or objectives of the Consumer Product Safety Act or the standard. This conclusion would be consistent with the treatment accorded the Toro commercial mowers which possess similar physical characteristics. See C?SC Advisory Opinion No. 284 (December 1, 1981).

1/ Description of the commercial mowers and their specifications are contained in Exhibit A, attached.

Margaret Freeston, Esq.  
March 9, 1982  
Page Two

Collier Shannon, Rill & Scott

1. Physical and performance characteristics of Benton and Goodall mowers indicate that they are intended for commercial use.

The model identification, functional characteristics and production figures for the mowers at issue are as follows:

<u>Model Number</u>	<u>Total No. of Units Produced in FY-81</u>	<u>Functional characteristics/ Intended Use</u>
B12-35B and G12-35B B12-35THX and G12-35THX		12" trimmers, with 3.5 H.P. engines. to trim cemetery monuments and markers.
BC18-35B and GC18-35B BC18-35BI/C* and GC18-35BI/C* BC18-35THX and GC18-35THX		18" and 21" cut mowers with steel deck, steel bail bearing wheels and heavy duty engines; some models (*) have 5H.P. Briggs & Stratton engine with I/C (industrial/commercial) features, namely, cast iron cylinder sleeve, stellate exhaust valve and rotor, dual element air cleaner.
BC21-35B and GC21-35B BC21-35BI/C* and GC21-35BI/C* BC21-35TX and GC21-35TX		
B22-35B and G22-35B B22-35I/C* and G22-35BI/C* B22-35TX and G22-35TX B22SPF-5T8 and G22SPF-5T8		Heavy-duty self-propelled 22" cut mower with 5 H.P. engine and large 6-quart fuel tank. Most units sold to state parks, highway departments and GSA.
B24L-5T and G24L-5T B24L-8BSB and G24L-8BSB		Heavy-duty self-propelled 24" cut mower with steel deck, featuring 3 and 5 H.P. engines. Sold primarily to highway departments for cutting medians.
B28L-8BSB and G28L-8BSB B28L-8J and G28L-8J B28M-8BSB and G28M-8BSB		Heavy-duty self-propelled 24" cut mower with 8 H.P. 2- and 4-cycle engine weighing 258 lbs.; for heavy maintenance use.

Margaret Freeston, Esq.  
March 9, 1981  
Page Three

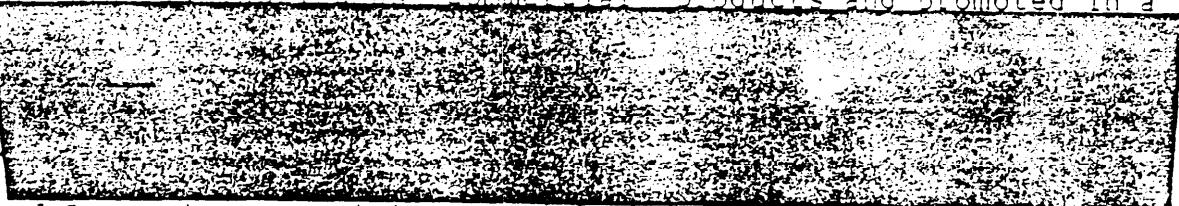
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As the above information reveals, Bunton's total production for all commercial models for which it seeks an interpretation is only [REDACTED] -- an average of [REDACTED] units per model. Moreover, almost [REDACTED] of Bunton's units are sold for use abroad. These [REDACTED] production figures reflect the fact that Bunton essentially builds to order for highly specialized commercial users.<sup>2/</sup>

2. Promotion and Distribution System Directed to Commercial Users.

In addition to the cost and physical features of Bunton's products, Bunton's advertising and distribution patterns virtually ensure that their specialty mowers will not end up in consumer use. These factors have been relied upon in prior Commission decisions to determine whether the mowers in question were consumer or commercial items. Toro, supra; Bachold Bros., Inc., supra; see also ASG Industries, Inc. v. CPSC, 593 F.2d 1323, 1328 (D.C. Cir.) cert. denied, 444 U.S. 864 (1979).

The Bunton and Goodall mowers for which an interpretation is requested are not marketed to the consumer. They are distinctly labeled as "commercial" products and promoted in a



of Bunton's advertising schedule is attached as Exhibit B). A list of Bunton's magazine press release placements reveals that these releases are also placed in exclusively commercial publications. (Bunton's press release magazine list is attached as Exhibit C).

The Bunton and Goodall lines are distributed in a manner different from the Tom Boy consumer line. Bunton's commercial distributors do not carry the Tom Boy line. The bulk of the Bunton's specialty mowers are distributed through one-step distribution, while the typical consumer pattern is a two-step system. According to Bunton's president, Mr. Stanley Byers, the percent-ages of Bunton's commercial mowers that were sold directly by the distributor to commercial or overseas users during FY 1981 is as follows:

- 2/ Bunton considers the production, distribution and advertising information contained in this letter to be confidential and hereby requests that it not be released by the Commission unless Bunton is first given notice and an opportunity to document its request for confidential treatment.

Units sold through GSA contracts  
Units sold to state and local governments  
Units sold to landscape or other  
professional services  
Units sold overseas

The remaining [redacted] are sold through retail. Bunton does not have accurate information as to what percentage of national sales are to consumer rather than commercial users, but Mr. Byers has estimated, on the basis of his knowledge of commercial and government sales nationally, and retail sales customers in Louisville, Kentucky, outlets, that sales to typical consumers would not amount to more than [redacted] of total sales.

Bunton's advertising and distribution approach is similar to that recognized by the Commission in the Toro advisory opinion as a factor in its determination that the mower at issue was not a consumer product within the meaning of the Act. On the basis of the above information, the Commission should reach a similar conclusion with respect to Bunton's products.

### 3. Low Risk of Injury in Relation to Cost of Compliance

The Commission has considered the degree of risk and the cost of compliance to be relevant to a determination of whether a product is a consumer or commercial item. In connection with the exclusion of reel-type mowers from the lawn mower standard, for example, the Commission observed that since reel mowers represented less than 1% of the walk-behind mower market, the low risk of injury from such mowers did not justify coverage within the standard. 44 Fed. Reg. 9997. Similarly, commercial mowers comprise only 1.8% of the total walk-behind power mower market.<sup>3/</sup> Moreover, because these mowers are customarily operated by knowledgeable and experienced commercial users, the risk of injury is significantly reduced.<sup>21</sup>

Where the risk of injury associated with a product is low, the Commission and the courts have recognized that the cost of compliance may determine the proper scope of a standard's coverage. See 44 Fed. Reg. 9998; ASG Industries, Inc. v. CPSC, 593 F.2d 1323 (D.C. Cir. 1979); Raua Slide N' Dive v. CPSC, 559 F.2d 831 (5th Cir. 1978). Thus, the Commission's decision to

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- <sup>3/</sup> Although these data include only those manufacturers who are members of OPEI, they illustrate the low level of exposure generated by commercial lawn mowers.
- <sup>4/</sup> Bunton has received reports of only 4 injuries in connection with the use of the mowers here at issue Over the past 30 years.

Margaret Freeston, Esq.  
March 9, 1992  
Page Five

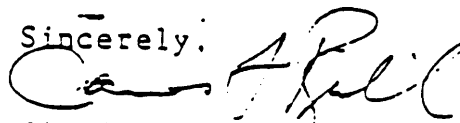
Collier, Shannon, Rill & Scott

exclude certain large mowers from the Walk-Behind Mower Standard's coverage was based, in part, on the fact that commercial or specialty mowers are typically manufactured by small-sized firms that would be subjected to an unreasonable economic burden if forced to redesign their products to comply with consumer safety features. 4 Fed. Reg. 9998.

As previously indicated, Bunton's commercial mowers are manufactured in very small quantities in response to specialized needs of the grass-cutting industry. Each model Bunton builds is very important to its overall sales picture. Adapting each of the 34 models to meet the standard would be prohibitive. Bunton could not continue to offer all of its specialized products to commercial users at reasonable prices.

To summarize, the unreasonable economic burden that compliance would impose on Bunton as a small, specialty manufacturer, as well as the similarities in physical characteristics and promotional approach between Bunton's commercial mowers and the Toro mowers recently categorized as commercial, support an interpretation from the Commission that Bunton's commercial mowers are not consumer products within the meaning of the Consumer Product Safety Act, 15 U.S.C. § 2051 et seq. and the Safety Standard for Walk-Behind Power Lawn Mowers, 16 C.F.R. Part 1205.

Sincerely,



JAMES F. RILL

Attorney for Bunton Company

JFR: jab  
Attachments



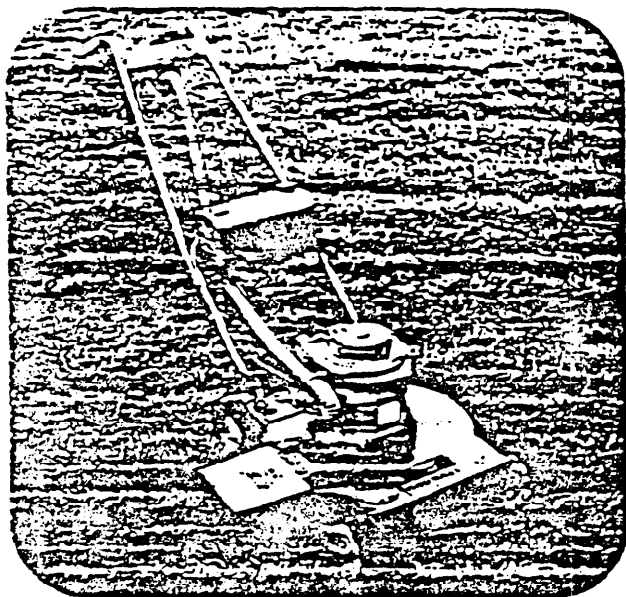
SECRET  
S-1-M-IXm

A

Note: Not all model variations of each type of mower are pictured but individual specifications are described on page A-4 of this Exhibit. Models highlighted in yellow are those described on page A-4 for which Bunton seeks an interpretation.

**GOODALL**

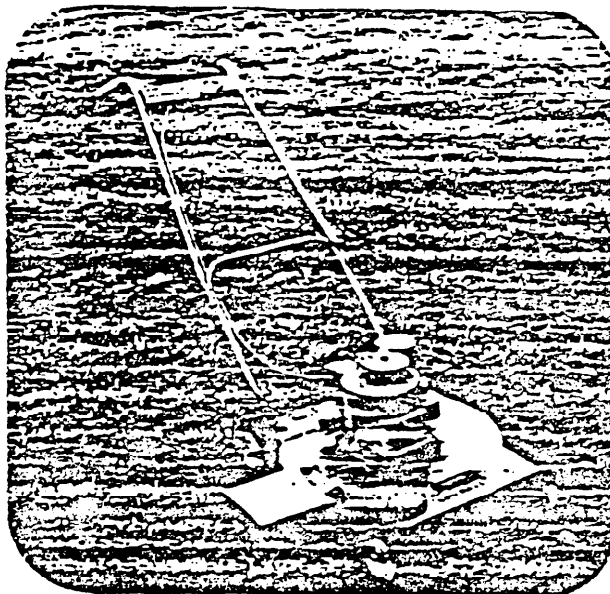
**H.D. COMMERCIAL PUSH with COMMERCIAL**



**18 in., HEAVY GAGE STEEL DECK, 3.5 H.P.**

A real tough, long-lasting unit for close work. The 12 gage steel frame and cutter housing, with unbreakable handles, heavy gage steel wheels on ball bearings with zerk fittings are built-in long-life features. Bag-Type Catcher optional.

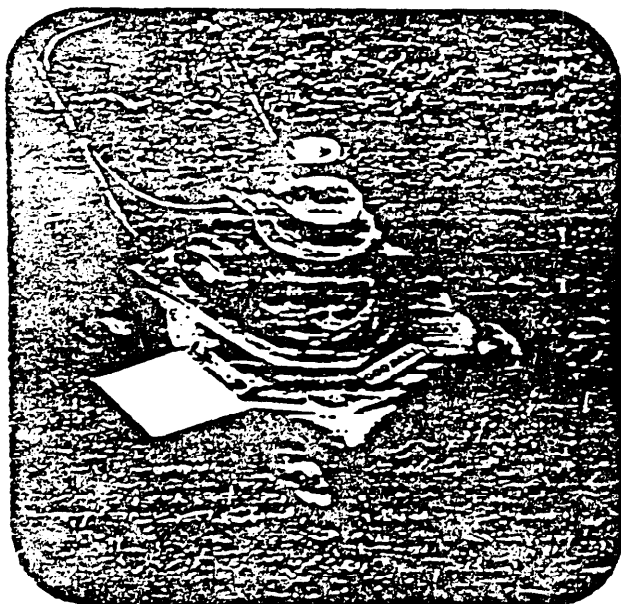
Choice of 3.5 H.P. Briggs Commercial engine with crankshaft protector, 1 qt. fuel tank Or 3.5 H.P. Tecumseh engine with ball bearing crankshaft protector, 6 qt. fuel tank and extra oil capacity. Grass Catcher Illustrated on Page 8.



**21 in., HEAVY GAGE STEEL DECK, 3.5 H.P. or 5 H.P.**

The unbreakable 21 in. push mower that outlasts several engines. It's amazing how long they keep going day after day, year after year. 12 gage steel deck (doubled at each corner), rugged wheels on ball bearings with zerk fittings, crankshaft protector, combination positive or slip-type blade driver, Grass Catcher optional.

Optional engines are 3.5 H.P. Briggs Commercial with 1 qt. fuel tank; 3.5 H.P. Tecumseh with extra oil capacity and 6 qt. fuel tank or 5 H.P. Briggs Commercial with 2 qt. fuel tank.



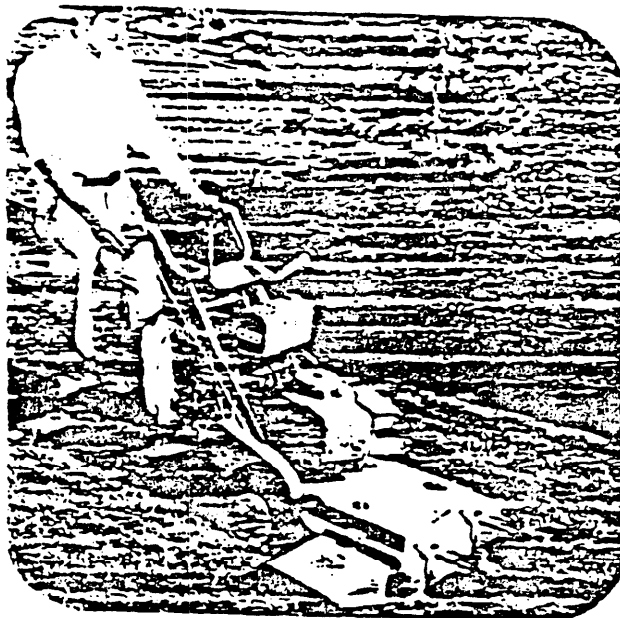
**22 in. CAST ALLOY DECK, 3.5 H.P. or 5 H.P.**

Even though lighter in weight than the 21 in. steel deck unit, this is a Commercial mower and with reasonable care will give many seasons of good service. While the deck is cast of special alloy, it is not unbreakable. Other than the deck, the Heavy-Duty features are same as the 21 inch steel mower. Like the 18 in. and 21 in. push mowers, a leaf mulcher plate is standard and the bag-type Grass Catcher is Optional.

**CHOICE, COMPARATIVE SPECIFICATIONS AND FEATURES  
3 H.P. to 5 H.P. ENGINES  
18", 21", 22" MOWERS, EDGERS, TRIMMERS**

ENGINE MAKE	BRIGGS & STRATTON			TECUMSEH		
ENGINE MODEL	3B	35B	5B VC	25TX	25THX	57B
ENGINE HORSEPOWER	3	3.5	5	3.5	3.5	5
USED ON 18" EDGER-TRIMMER	X					
USED ON 2" FIELD LINE CUTTER	X					
CHOICE ON 18" TRIMMER					X	
CHOICE ON 18" PUSH MOWER					X	
CHOICE ON 21" PUSH MOWER					X	
CHOICE ON 22" PUSH MOWER					X	
CHOICE ON 22" SELF-PROP MOWER						X
FUEL CAP. (MOWERS)		1 QT.	2 QT.	6 QT.	6 QT.	6 QT.
FUEL CAP. 18" EDGER-TRIMMER	1 QT.					
FUEL CAP. 2" FIELD LINE CUTTER	1 QT.					
FUEL CAP. 12" TRIMMER		1 QT.			1 1/2 QT.	
FUEL FILTER (IN LINE)				X	X	X
OIL CAP. (OUNCES)	20	20	28	53	53	28
AIR CLEANER - DUAL ELEMENT	X	X	X			
AIR CLEANER - REMOTE SNORKEL				X	X	X
GOVERNOR - AIR - VANE	X	X				
GOVERNOR - MECHANICAL			X	X	X	X
CHOKE - AUTOMATIC	X	X				
CHOKE - REMOTE CONTROL			X	X	X	X
CRANKSHAFT PROTECTOR		X	X	X	X	
BALL BEARINGS ON CRANKSHAFT						

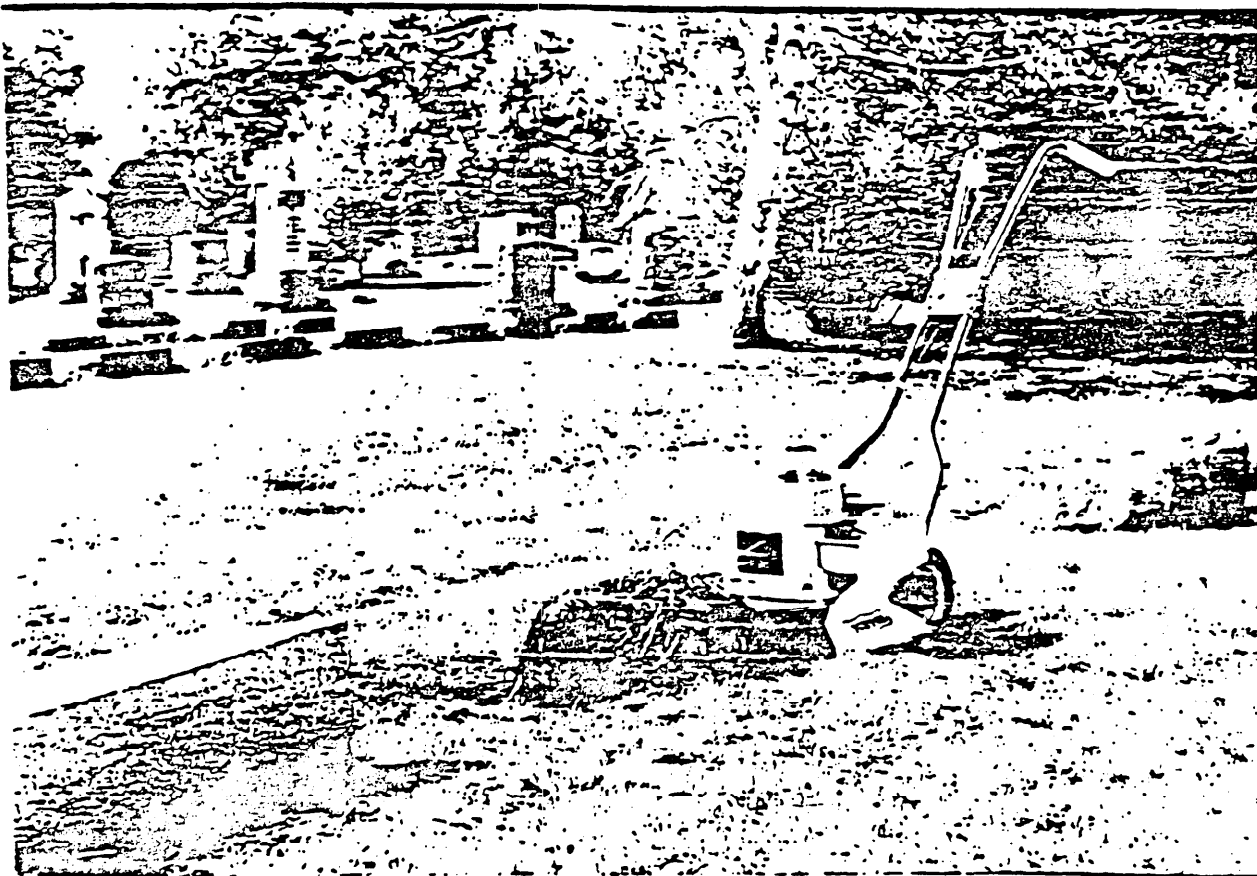
To give you longer engine life and less maintenance, we have discontinued offering a choice of standard or commercial engines. Now, all models offer only the best engines that the manufacturer builds. Our units are so rugged, they have a reputation for outlasting several engines.



24 in., 8 H.P. BRIGGS

Two caster wheels out front for easy handling and level mowing. Blade, variable ground speed and engine throttle controls conveniently located on handle. Adjustable rear axle to raise frame for rough mowing. Turns closer than some Push Mowers. Grass Catcher and Rider Attachment are optional.

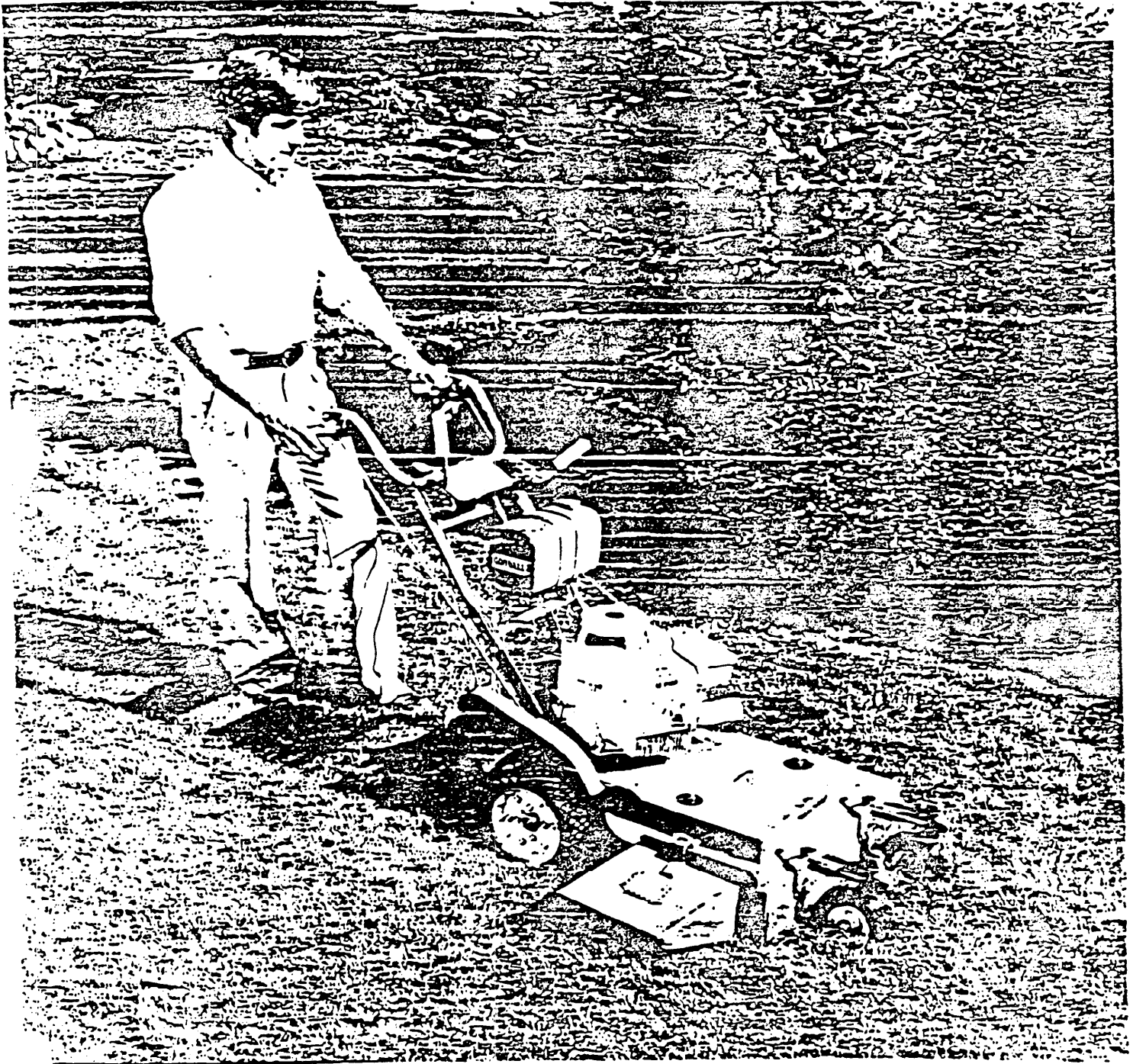
Goodall & Bunton 12" trimmer and 24", 8H.P. model.



No picture of Goodall mower is available but Bunton and Goodall trimmers are identical in all respects.

Exhibit A-3

GOODALL 25' . 3H.P. Mower  
(BUNION model is identical  
in all respects).



## COMPARE THESE SPECIFICATIONS — YOU CAN FIND WHAT'S BEST FOR YOU

MODEL	H.P.	ENGINE	FUEL CAP.	WHEEL BASE	TRAC. WHL WIDTH	TRACTOR LENGTH	TRACTOR WIDTH	TRACTION WHEELS	NET WGT.	SHPG. WGT.
<b>H.D. COMMERCIAL TRACTORS</b>										
G723-196K	19.6	Kohler Gasoline	10 Gal.	54"	53-3.4	8'10"	54-3.4	23 X 10.50	1350#	1454#
G723-19WD	19	Wisconsin Diesel	10 Gal.	54"	53-3.4	8'10"	54-3.4	23 X 10.50	1355#	1515#
G723-30CD	30	Deutz Diesel	10 Gal.	54"	53-3.4	8'10"	54-3.4	23 X 10.50	1500#	1647#

MODEL	SIZE	ATTACHMENT	CUTTING HEIGHTS	OVERALL WIDTH	FRONT WHEELS	REAR WHEELS	LEAF MULCHER	NET WGT.	SHPG. WGT.
<b>H.D. COMMERCIAL TRACTOR ATTACHMENTS (Front Mounted With Hydraulic Lift)</b>									
GMAFM-51	51 in.	Mulching blower	1,2,3,4,5,6"	62"	11.5" X 4"	6" X 2"	Yes	392#	368#
GMAFT-51	51 in.	Turf Mower, Side Discharge	1,2,3,4,5,6"	62"	11.5" X 4"	6" X 2"	Yes	300#	375#
GMAFM-71	71 in.	Mulching Mower	1,2,3,4,5,6"	72"	11.5" X 4"	6" X 2"	Yes	320#	406#
GMAFT-71	71 in.	Turf Mower, Side Discharge	1,2,3,4,5,6"	72"	11.5" X 4"	6" X 2"	Yes	331#	417#
GFB-50	50 in.	Rotary Broom - Hydraulic Lift, Tire Chains						225#	247#
GSB-50	50 in.	Snow Blade - Hydraulic Lift and Angle Control, Spring Trio, Tire Chains						145#	155#
GSPL-50	50 in.	Snow Plow (V-Type) - Hydraulic Lift, Tire Chains						140#	160#
GST-50	50 in.	Snow Thrower - 2 Stage - Hydraulic Lift, Tire Chains						406#	451#
GCAB		All Weather Cab (Includes Front Lights, Back-Up Light, Amber Flasher, Windshield Wiper & Defrost Can).						400#	400#
GCAB-H		Cab Heater						35#	35#
GCAB-RK		Cab Road Kit (Two Combination Signals with Emergency Flasher).						10#	10#
GROPS		Roll Over Protection						200#	255#

MODEL	CUTTING WIDTH	H.P. ENGINES	FUEL CAP.	CUTTING HEIGHTS	REAR WHEELS	FRONT WHEELS	NET WGT.	SHPG. WGT.
<b>H.D. COMMERCIAL ROTARY GANG MULCHING MOWERS (Mulches Leaves, Too)</b>								
GGM1-52-38	4'4"	8	1-Bnggs	4 Gal.	1,2,3,4,5,6"	13" X 6.50"	11.5" X 4"	350#
GGM2-100-168	8'4"	16	2-Bnggs	8 Gal.	1,2,3,4,5,6"	13" X 6.50"	11.5" X 4"	700#
GGM3-148-248	12'4"	24	3-Bnggs	12 Gal.	1,2,3,4,5,6"	13" X 6.50"	11.5" X 4"	1,050#
GGM4-196-328	16'4"	32	4-Bnggs	16 Gal.	1,2,3,4,5,6"	13" X 6.50"	11.5" X 4"	1,400#
GGM5-244-408	20'4"	40	5-Bnggs	20 Gal.	1,2,3,4,5,6"	13" X 6.50"	11.5" X 4"	1,750#

MODEL	CUTTING WIDTH	H.P. ENGINE	FUEL CAP.	FRAME	FRONT WHEELS	REAR WHEELS	GRASS CATCHER	LEAF MULCHER	CUTTING HEIGHTS	NET WGT.	SHPG. WGT.
<b>H.D. COMMERCIAL EDGER-TRIMMER</b>											
G760-38	10"	3	Bnggs	3 at Steel	10" X 1.75"	10" X 1.75"	No	No		86#	90#
<b>H.D. COMMERCIAL ATHLETIC FIELD LINE CUTTER</b>											
G769-38	3"	3	Bnggs	3 Qt. Steel	10" X 1.75"	10" X 1.75"	No	NO		91#	95#
<b>H.D. COMMERCIAL TRIMMER</b>											

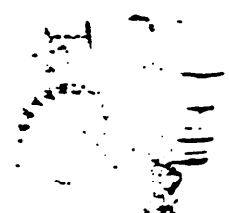
MODEL	CUTTING WIDTH	H.P. ENGINE	OIL CAP.	FUEL CAP.	FRAME	CUTTING HEIGHT	GRASS CATCHER	LEAF MULCHER	NET WGT.	SHPG. WGT.
<b>H.D. COMMERCIAL PUSH MOWERS WITH COMMERCIAL ENGINES</b>										

All models have heavy gage steel wheels on ball bearings with zerk fittings. 8" X 1.75" tires

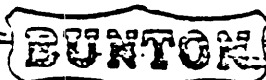
## COMMERCIAL SELF-PROPELLED MOWER (Front Wheel Drive)

Now Available on Goodall Mowers

Now Available ON, Goodall Tractors

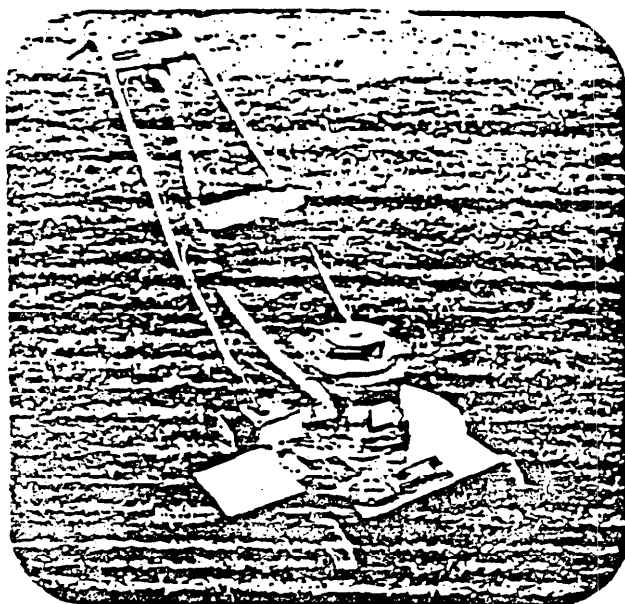






## H.D. COMMERCIAL PUSH with COMMERCIAL ENGINE

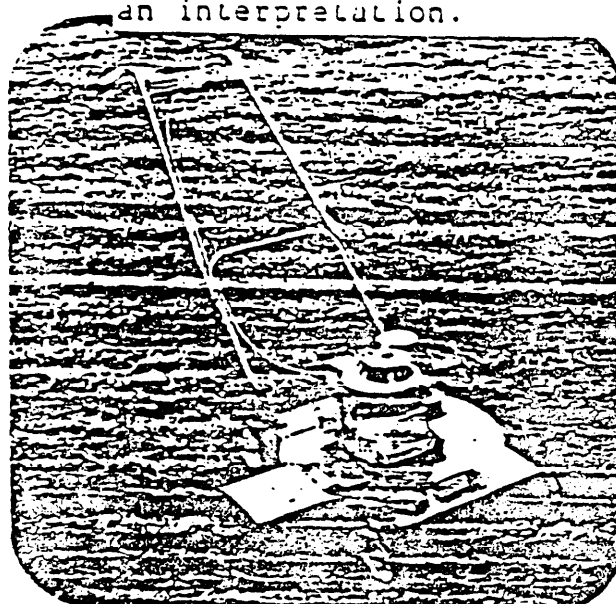
Note: not all model variations of each type of mower are pictured but individual specifications are described on page A-4 of this Exhibit. Models highlighted in yellow are those described on page A-4 for which Bunton seeks an interpretation.



**18 in. HEAVY GAGE STEEL DECK, 3.5 H.P.**

A real tough, long-lasting unit for close work. The 12 gage steel time and cutter housing, along with unbreakable handles, heavy gage steel wheels on ball bearings with zerex fittings are built-in long-life features. Bag-Type Catcher optional.

Choice of 3.5 H.P. Briggs Commercial engine mm crankshaft protector, 1 qt. fuel tank of 3.5 H.P. Tecumseh engine with ball bearing crankshaft protector, 6 qt. fuel tank and extra oil capacity. Grass Catcher illustrated on Page 8.



**21 in. HEAVY GAGE STEEL DECK, 3.5 H.P. or 5 H.P.**

The unbreakable 21 in. push mower that outlasts several engines. It's amazing how long they keep going day after day, year after year. 12 gage steel deck (doubled at each corner), rugged wheels on ball bearings with zerex fittings, crankshaft protector, combination positive or slip-type blade driver. Grass Catcher optional.

Optional engines are 3.5 H.P. Briggs Commercial with 1 qt. fuel tank; 3.5 H.P. Tecumseh with extra oil capacity and 6 qt. fuel tank or 5 H.P. Briggs Commercial with 2 qt. fuel tank.

### CHOICE, COMPARATIVE SPECIFICATIONS AND FUTURES 3 HP. to 5 HP. ENGINES 1b. 21", 22" MOWERS, EDGERS, TRIMMERS

ENGINE MAKE	BRIGGS & STRATTON				TECUMSEH			
ENGINE MODEL	21	22	23	24	25	26	27	28
ENGINE HORSEPOWER	3	3.5	5	5	3.5	3.5	5	5
USED ON 16" EDGER-TRIMMER	X							
USED ON 2" FIELD LINE CUTTER	X							
CHOICE OF ENGINE SPEEDS								
CHOICE OF 12" SLIP MOWER								
CHOICE OF 2" FIELD MOWER								
CHOICE OF 3.5 H.P. ENGINE								
CHOICE OF 5 H.P. ENGINE								
FUEL CAP. (MOWERS)	1 QT. 2 QT. 5 QT. 6 QT. 4 QT.							
FUEL CAP. 16" EDGER-TRIMMER	3 QT.							
FUEL CAP. 2" FIELD LINE CUTTER	3 QT.							
FUEL CAP. 12" TRIMMER	1 QT.						1 1/2 QT.	
FUEL FILTER (IN LINE)					X	X	X	X
OIL CAP. (OUNCES)	20	20	20	20	53	53	20	
AIR CLEANER - DUAL ELEMENT	X	X	X	X				
AIR CLEANER - REMOTE SNORKEL					X	X	X	
GOVERNOR - AIR - VANE	X	X						
GOVERNOR - MECHANICAL			X	X	X	X	X	
CHOKE - AUTOMATIC	X	X						
CHOKE - REMOTE CONTROL			X	X	X	X	X	
CRANKSHAFT PROTECTOR		X	X	X	X	X		
BALL BEARINGS ON CRANKSHAFT					1	1		



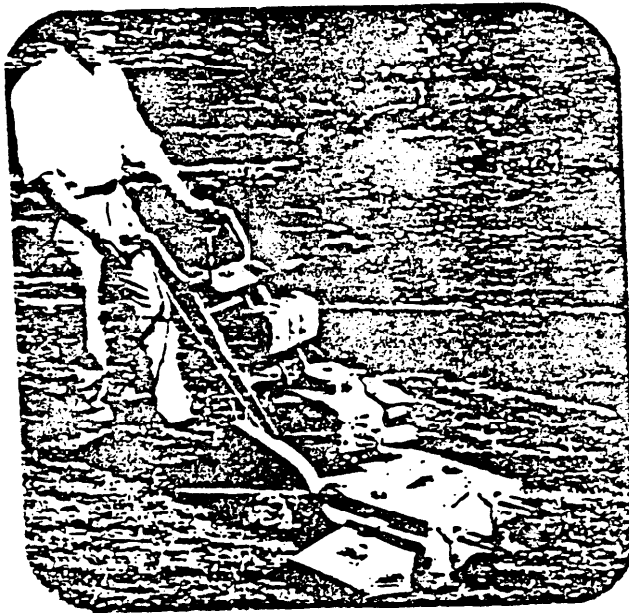
**22 in. CAST ALLOY DECK, 3.5 HP. or 5 HP.**

Even though lighter in weight than the 21 in. steel deck unit, this is a Commercial mower and with reasonable care will give many seasons of good service. While the deck is cast of special alloy, it is not unbreakable. Other than the deck, the Heavy-Duty features are same as the 21 inch steel mower. Like the 18 in. and 21 in. push mowers, a leaf mulcher plate is standard and the bag-type Grass Catcher is Optional.

To give you longer engine life and less maintenance, we have discontinued offering a choice of standard or commercial engines. Now, all models offer only the best engines that the manufacturer builds. Our units are so rugged, they have a reputation for outlasting several engines.



For picture of the Bunton  
12" trimmer and 28"  
see Exhibits A-2,3.



24 in., 8 H.P. BRIGGS

Two caster wheels out front for easy handling and level mowing. Blade, variable ground speed and engine throttle controls conveniently located on handle. Adjustable rear axle to raise frame for rough mowing. Turns closer than some Push Mowers. Grass Catcher and Rider Attachment are optional.

# BUNTON

## COMPARE THESE SPECIFICATIONS — YOU CAN FIND WHAT'S BEST FOR YOU

MODEL	H.P.	ENGINE	FUEL CAP.	WHEEL BASE	TRAC. WHL. WIDTH 0.0.	TRACTOR LENGTH	TRACTOR WIDTH	TRACTION WHEELS	NET WGT.	SHPG. WGT.
H.D. COMMERCIAL TRACTORS										
BT23-196K	19.6	Konler. Gasoline	10 Gal.	54"	53-3/4	8'10"	54-3/4	23 x 10.50	1,350#	1,494#
BT23-19WD	38	Wauchope Diesel	10 Gal.	54"	53-3/4	8'10"	54-3/4	23 x 10.50	1,368#	1,515#
BT23-300D		Deutz Diesel	10 Gal.	54"	53-3/4	8'10"	54-3/4	23 x 10.50	1,500#	1,647#

MODEL	SIZE	ATTACHMENT	CUTTING HEIGHTS	OVERALL WIDTH	FRONT WHEELS	REAR WHEELS	LEAF MULCHER	NET WGT.	SHPG. WGT.
H.D. COMMERCIAL TRACTOR ATTACHMENTS (Front Mounted With Hydraulic Lift)									
BMAFM-61	61 in.	Mulching Mower	1,2,3,4,5,6"	62'	11.5" x 4"	6" x 2"	Yes	292#	368#
BMAFT-61	61 in.	Turf Mower. Side Discharge	1,2,3,4,5,6"	62'	11.5" x 4"	6" x 2"	Yes	300#	376#
BMAFM-71	71 in.	Mulching Mower	1,2,3,4,5,6"	72"	11.5" x 4"	6" x 2"	Yes	320#	406#
BMAFT-71	71 in.	Turf Mower. Side Discharge	1,2,3,4,5,6"	72"	11.5" x 4"	6" x 2"	Yes	331#	417#
BRB-60	60 in.	Rotary Broom - Hydraulic Lift. Tire Chains						225#	247#
BSB-60	60 in.	Snow Blade - Hydraulic Lift and Angle Control. Spring Trip. Tire Chains						45#	165#
BSPL-60	60 in.	Snow Plow (V-Type) - Hydraulic Lift. Tire Chains						140#	160#
BST-60	60 in.	Snow Thrower - 2 Stage - Hydraulic Lift. Tire Chains						406#	451#
BCAB		All Weather Cab (Includes Front Lights, Back-Up Light Amber Flasher, Windshield Wiper & Defrost Fan). 400# Approx.							
BCAB-H		Cab Heater							35# Approx.
BCAB-RK		Cab Road Kit (Two Combination Signals with Emergency Flasher).							10# Approx.
BROPS		Roll Over Protection						200#	255#

MODEL	CUTTING WIDTH	H.P. ENGINES	FUEL CAP.	CUTTING HEIGHTS	REAR WHEELS	FRONT WHEELS	NET WGT.	SHPG. WGT.
H.D. COMMERCIAL ROTARY GANG MULCHING MOWERS (Mulches Leaves, Too)								
BGM1-52-8B	4'4"	8	1-Briggs	4 Gal.	1,2,3,4,5,6"	13" x 6.50"	11.5" x 4"	350# 450#
BGM2-100-16B	8'4"	16	2-Briggs	8 Gal.	1,2,3,4,5,6"	13" x 6.50"	11.5" x 4"	700# 900#
BGM3-148-24B	12'4"	24	3-Briggs	12 Gal.	1,2,3,4,5,6"	13" x 6.50"	11.5" x 4"	1,050# 1,350#
BGM4-196-32B	16'4"	32	4-Briggs	16 Gal.	1,2,3,4,5,6"	13" x 6.50"	11.5" x 4"	1,400# 1,800#
BGM5-244-40B	20'4"	40	5-Briggs	20 Gal.	1,2,3,4,5,6"	13" x 6.50"	11.5" x 4"	1,750# 2,250#

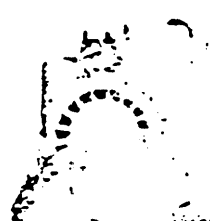
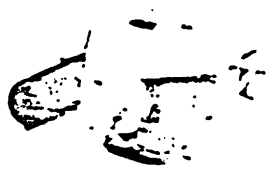
JOEL	CUTTING WIDTH	H.P. ENGINE	FUEL CAP.	FRAME	FRONT WHEELS	GRASS CATCHER	LEAF MULCHER	CUTTING HEIGHTS	NET WGT.	SHPG. WGT.
H.D. COMMERCIAL EDGER-TRIMMER										
BET10-3B	10" 3	Briggs	3 Qt.	Steel	10" x 1.75"	10" x 1.76"	No	No	86#	90#
H.D. COMMERCIAL ATHLETIC FIELD LINE CUTTER										
BLM-3B	3" 3	Briggs	3 Qt.	Steel	10" x 1.75"	10" x 1.75"	No	No	91#	95#
H.D. COMMERCIAL TRIMMER										

MOOR	CUTTING WIDTH	H.P. ENGINE	OIL CAP.	FUEL CAP.	FRAME	CUTTING HEIGHT	GRASS CATCHER	LEAF MULCHER	NET WGT.	SHPG. WGT.
H.D. COMMERCIAL PUSH MOWERS WITH COMMERCIAL ENGINES										
All models have heavy gage steel wheels on ball bearings with zerck fittings, 8" X 1.75" tires										

### COMMERCIAL SELF-PROPELLED MOWER (Front Wheel Drive)

Now Available on Bunton Mowers

Now Available on Bunton Tractors





WHEN YOU SELECT A BUNTON — IT'S LIKE HAVING IT CUSTOM BUILT

MODEL	SIZE H. P.	ENGINE	FUEL USED	FUEL CAP. GALS.	CUTTING HEIGHT INCHES	WHEEL SIZE REAR	WHEEL SIZE FRONT	WEIGHT NET	WEIGHT SHPG.
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**H.D. COMMERCIAL LAWN MOWERS (Side Discharge), 6" FRONT CASTERS, 1-3/4" to 4-1/2" CUTTING HEIGHT**

B32L-88SB	32"	8	Briggs	Gas	1-1/2	1-3/4	-	4-1/2	13 X 6.50	6 X 2	271#	300#	
B32L-8J	32"	8	JLO	2	Cycle Gas &	Oil	1-1/2	1-3/4	4-1/2	13 x 5.50	6 X 2	289#	309#
B32L-11B	32"	11	Briggs	Gas	1-1/2	1-3/4	-	4-1/2	13 X 6.50	6 X 2	281#	310#	
B32L-11BBS	32"	11	Briggs (Battery Start)	Gas	1-1/2	1-3/4	-	4-1/2	13 X 6.50	6 X 2	314#	343#	
B32L-10TCI	32"	10	Tecumseh	Cast Iron	Gas	1-1/2	1-3/4	4-1/2	13 X 6.50	6 X 2	326#	353#	
B36L-88SB	36'	8	Briggs	Gas	3	2	-	4-1/2	13 X 6.50	6 X 2	318#	360#	
B36L-8J	36"	8	JLO	2	Cycle Gas &	Oil	3	2	4-1/2	13 X 5.50	6 X 2	325#	371#
936L-80	36'	8	Diesel	Diesel	3	2	-	4-1/2	13 X 6.50	6 X 2	379#	421#	
B36L-11B	36"	11	Briggs	Gas	3	2	-	4-1/2	13 X 6.50	6 X 2	329#	370"	
B36L-11BBS	36'	11	Briggs (Battery Start)	Gas	3	2	-	4-1/2	13 X 6.50	6 X 2	361#	403#	
B36L-10TCI	36"	10	Tecumseh	Cast Iron	Gas	2	-	4-1/2	13 X 6.50	6 X 2	373#	415#	
B36L-16BBS	36'	16	Briggs Twin (Battery Start)	Gas	3	2	-	4-1/2	13 X 6.50	6 X 2	385#	431#	
B52L-8D	52"	8	Diesel	Diesel	3	2	-	4-1/2	13 x 5.5 0	6 X 2	425#	504#	
B52L-11B	52"	11	Briggs	Gas	3	2	-	4-1/2	13 X 6.50	6 X 2	374#	453#	
B52L-11BBS	52"	11	Briggs (Battery Start)	Gas	3	2	-	4-1/2	13 X 6.50	6 X 2	407#	486#	
B52L-10TCI	52"	10	Tecumseh	Cast Iron	Gas	3	2	-	4-1/2	13 X 5.50	6 X 2	419#	498#
B52L-125J	52"	12.5	JLO	2	cycle Gas &	Oil	2	-	4-1/2	13 X 6.50	6 X 2	390#	4738
B52L-16BBS	52"	16	Briggs Twin (Battery Stan)	Gas	3	2	-	4-1/2	13 X 6.50	6 X 2	434#	513#	

**H.D.. COMMERCIAL TURF MOWERS** (Side Discharge), 11.5" FRONT CASTERS, 1-3/8" to 6-1/2" CUTTING HEIGHT

[illegible]

**EGCL GRASS CATCHER** (2.5 au. all-metal. **dump-as-you-mow**) for 24, 28, 32 and 36 inch **LAWN** or **TURF** mowers . . . 30# 35#

**H.D..COMMERCIAL MULCHING MOWERS (No Discharge Chute). 11.5" FRONT CASTERS. 1" to 6" CUTTING HEIGHT**

836M-8J	36"	8 JLO	2	Cycle	Gas	&	Oil	3	1	-6	13 X 6.50	11.5 X 4	361#	407#
836M-8D	36"	8	8	Diesel	Diesel		3			1-6	13 X 6.50	11.5 X 4	415#	457#
836M-11B	36"		11	Briggs		Gas	3			1-6	13 X 6.50	11.5 X 4	364#	406#
836M-118BS	36"		11	*Briggs (Battery Start)		Gas	3			1-6	13 X 6.50	11.5 X 4	397#	439#
836M-10TCI	36"	10		Tecumseh	Cut	Iron	Gas	3		1-6	13 X 6.50	11.5 X 4	409#	451#
836M-16BBS	36"	16		*Briggs Twin (Battery Start)			Gas	3		1-6	13 X 6.50	11.5 X 4	421#	463#
852M-8D	52"	8		Diesel	Diesel		3			1-6	13 X 6.50	11.5 X 4	447#	514#
852M-11B	52"	11		Briggs		Gas	3			1-6	13 X 6.50	11.5 X 4	396#	475#
852M-118BS	52"	11		*Briggs (Battery Start)		Gas	3			1-6	13 X 6.50	11.5 X 4	429#	508#
852M-10TCI	52"	10		Tecumseh	Cast	Iron	Gas	3		-6	13 X 6.50	11.5 X 4	441#	520#
852M-125J	52"	12.5	JLO	2	Cycle	Gas	6	Oil	1	6	13 X 6.50	11.5 X 4	412#	495#
852M-16BBS	52"	16		*Briggs Twin (Battery Start)		Gas	3			1-6	13 X 6.50	11.5 X 4	463#	532#

**'INCLUDES BATTERY**

52428 RIDER Attachment for 24 and 29 inch mowers. 24" wide, instant hitch, brakes . . . . . 33# 36#

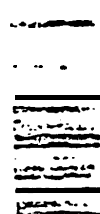
53252 RIDER Attachment for 32, 36 and 52 inch mowers. 30" wide, instant hitch brakes.....	42*	46*
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32.36 and 52 Inch Models have Independent Traction Wheel Brakes, Finger-Tip Controlled, For Power Turning, Quick Stopping and Parking.

WHAT A CHOICE OF COMMERCIAL MOWERS! 3 TYPES* — 5 CUTTING WIDTHS** — 9 ENGINES	Cutting Width Inches	5 H.P. Tecumseh	8 H.P. Bggs	8 H.P. Diesel	8 H.P. JLO 2 Cycle	10 H.P. Tecumseh Cast Iron	11 H.P. Bggs	11 H.P. Bggs Banery Slant	12.5 H.P. JLO 2 Cycle	16 H.P. Bggs Twin Bar Slant
LAWN MOWER - 6" Front Casters, 1-3/4" to 4-1/4" Cutting Height	24	ST								
" " " " " " " "	28		SB			SJ				
" " " " " " " "	32		SB			SJ	TCCTC	11B	11BBB	
" " " " " " " "	36		SB	B O		SJ	TCCTC	11B	11BBB	15B
" " " " " " " "	32			B O		SJ	TCCTC	11B	11BBB	15B
TURF MOWER - 11.5" Front Casters, 1-3/8" to 6-1/2" Cutting Height	36	T		B O		SJ	TCCTC	11B	11BBB	15B
" " " " " " " "	32	T		B O		SJ	TCCTC	11B	11BBB	15B
MULCHING MOWER - 11.5" Front Casters, 1" to 6" Cutting Height	36	M		B O		SJ	TCCTC	11B	11BBB	15B
" " " " " " " "	32	M		B O		SJ	TCCTC	11B	11BBB	15B



withheld



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November 24, 1981

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