



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
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March 11, 2016

Mr. Greg Knott  
Vice President, Regulatory Affairs  
Outdoor Power Equipment Institute  
341 South Patrick Street  
Alexandria, VA 22314

Dear Mr. Knott:

On February 17, 2016, U.S. Consumer Product Safety Commission (“CPSC”) staff received a second canvass ballot draft of ANSI/OPEI B71.9-2016, *American National Standard for Multipurpose Off-Highway Utility Vehicles*.<sup>1</sup> Staff appreciates the opportunity to comment on the canvass draft and is very pleased to see OPEI taking significant steps to improve the voluntary standard with the addition of requirements in the areas of lateral stability, vehicle handling, and occupant protection. CPSC staff supports the proposed changes to the voluntary standard contained in the recirculation ballot and believes the aggregate effect of improved vehicle stability, handling, and occupant protection will reduce injuries and deaths associated with ROV rollovers.

In a letter dated December 1, 2015, CPSC staff commented on the first canvass draft ANSI/OPEI B71.9-2016, *American National Standard for Multipurpose Off-Highway Utility Vehicles*. In response, OPEI has stated a commitment to work with CPSC staff towards developing more specific hang tag requirements and OPEI has modified the voluntary standard to clarify tilt table and vehicle handling test procedures.<sup>2</sup>

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<sup>1</sup> The comments in this letter are those of the CPSC staff and have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

<sup>2</sup> Letter from Greg Knott, OPEI, to Caroleene Paul, CPSC, dated February 17, 2016. Retrieved from <http://www.cpsc.gov/Global/Regulations-Laws-and-Standards/Voluntary-Standards/ROHVA/OPEIletterCPSCresponsestaffcomments1201152ndcanvassdraft.pdf>.

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Thank you for this opportunity to comment. CPSC staff looks forward to continued cooperation with OPEI regarding the ANSI/OPEI B71.9-2016 standard. If you have any questions or comments, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Caroleene Paul". The signature is written in a cursive style with a large, looped initial "C".

Caroleene Paul

cc: Patricia Edwards, CPSC Voluntary Standards Coordinator