



UNITED STATES  
 CONSUMER PRODUCT SAFETY COMMISSION  
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This document has been electronically  
 approved and signed.

**DATE:** June 19, 2015

**BALLOT VOTE SHEET**

**TO:** The Commission  
 Todd A. Stevenson, Secretary

**THROUGH:** Stephanie Tsacoumis, General Counsel  
 Patricia H. Adkins, Executive Director

**FROM:** Patricia M. Pollitzer, Assistant General Counsel  
 Mary A. House, Attorney, OGC

**SUBJECT:** Federal Register Notice: Electronic Filing of Certificates of Compliance:  
 Announcement of PGA Message Set Test and Request for Participants

BALLOT VOTE DUE: June 25, 2015

The Office of the General Counsel is providing for Commission consideration the attached draft notice, relating to an e-filing pilot, for publication in the *Federal Register*. The draft notice would announce the joint intent of U.S. Customs & Border Protection (“CBP”) and the U.S. Consumer Product Safety Commission (“Commission” or “CPSC”) to conduct a test to assess the electronic filing of CPSC certificates of compliance via the Partner Government Agency Message Set to the CBP-authorized Electronic Data Interchange system, known as the Automated Commercial Environment, for regulated finished consumer products. The notice requests stakeholders to apply to participate in the test. CBP has reviewed and consented to publication of the notice.

Please indicate your vote on the following options:

- I. Approve publication of the attached document in the *Federal Register*, as drafted.

\_\_\_\_\_  
 (Signature)

\_\_\_\_\_  
 (Date)

II. Approve publication of the attached document in the *Federal Register*, with changes. (Please specify.)

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\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

III. Do not approve publication of the attached document in the *Federal Register*.

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

IV. Take other action. (Please specify.)

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\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

Attachment: Draft *Federal Register* Notice: Electronic Filing of Certificates of Compliance: Announcement of PGA Message Set Test and Request for Participants

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[Billing Code 6355-01-P]

### **CONSUMER PRODUCT SAFETY COMMISSION**

#### **Electronic Filing of Certificates of Compliance: Announcement of PGA Message Set Test and Request for Participants**

**AGENCY:** Consumer Product Safety Commission.

**ACTION:** Notice.

**SUMMARY:** To advance the concept of a “single window” to facilitate electronic collection, processing, sharing, and reviewing of trade data and documents required by federal agencies during the cargo import and export processes, the U.S. Consumer Product Safety Commission (“Commission” or “CPSC”), in consultation with U.S. Customs & Border Protection (“CBP”) announce their joint intent to conduct a test to assess the electronic filing of certificates of compliance (“certificates”) via the Partner Government Agency (“PGA”) Message Set to the CBP-authorized Electronic Data Interchange (“EDI”) system known as the Automated Commercial Environment (“ACE”) for regulated finished consumer products. During the test, participants will collaborate with CBP and CPSC to examine the effectiveness of the “single window” capability. Based on stakeholder feedback, the test also will assess the concept of a certificate registry (the “Certificate Registry”), maintained by CPSC, which would allow stakeholders to file a reference to existing certificate data through the PGA Message Set, rather than by entering complete certificate data for each entry.

This notice provides the following key information:

- International Trade Data System (“ITDS”) and CBP’s authority to conduct test programs;
- the Commission’s authority regarding certificates;

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- the purpose of the test;
- an explanation of the test concept;
- the availability of CPSC’s supplemental Customs and Trade Automated Interface Requirements (“CATAIR”) guideline and request for technical comments;
- participant eligibility, selection criteria, and responsibilities;
- the advantages of test participation; and
- a request that importers interested in test participation contact the Commission.

**DATES:** The test program will begin no earlier than July 13, 2016. Electronic requests to participate in the test program may be submitted on or before [INSERT DATE THAT IS 45 DAYS AFTER PUBLICATION IN THE FEDERAL REGISTER] and throughout the duration of the test. CPSC will consider applications to participate until the test capacity of nine participants is filled. The test will continue until terminated by way of an announcement in the *Federal Register*.

**ADDRESSES:** Requests to participate in the test and technical comments on CPSC’s supplemental CATAIR guideline (which will be made available on CBP.gov) should be submitted through electronic mail to: [efilingpilot@cpsc.gov](mailto:efilingpilot@cpsc.gov). Requests to participate in the test should contain the subject heading: “Application to participate in PGA Message Set Test.” Technical comments on CPSC’s supplemental CATAIR guidelines should contain the subject heading “CATAIR Technical Comments.”

**FOR FURTHER INFORMATION CONTACT:** Questions regarding the test should be directed to Jim Joholske, Deputy Director, Office of Import Surveillance, U.S. Consumer Product Safety Commission, (301) 504-7527, [efilingpilot@cpsc.gov](mailto:efilingpilot@cpsc.gov). Questions sent by electronic mail should contain the subject heading “Question re PGA Message Set Test.” For

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technical questions regarding ACE or ABI transmissions, or the PGA message set data transmission, please contact your assigned CBP client representative. Interested parties without an assigned client representative should submit an email to Steven Zaccaro at [steven.j.zaccaro@cbp.dhs.gov](mailto:steven.j.zaccaro@cbp.dhs.gov).

### SUPPLEMENTARY INFORMATION:

#### I. Background

##### A. *The Automated Commercial Environment*

ACE is an automated and electronic system for commercial trade processing that is intended to streamline business processes, facilitate growth in trade, ensure cargo security, and foster participation in global commerce, while ensuring compliance with U.S. laws and regulations, and reducing costs for CBP and all of its communities of interest. The Automated Broker Interface (“ABI”) is a software interface to ACE. Commercial trade participants who want to file entries in ACE use ABI to electronically file required import data with CBP. ABI transfers trade-submitted data into ACE. CBP is developing ACE as the “single window” for the trade community to comply with the ITDS requirement established by the SAFE Port Act of 2006. The PGA Message Set enables additional trade-related data specified by PGAs, such as CPSC’s certificate data, to be entered in one location.

##### B. *CBP and CPSC Authority to Regulate the Importation of Consumer Products*

Section 14(a) of the Consumer Product Safety Act (“CPSA”), as amended by section 102(b) of the Consumer Product Safety Improvement Act of 2008 (“CPSIA”), Public Law 110-314, requires manufacturers (including importers) and private labelers of certain regulated consumer products manufactured outside the United States to test and certify such products as compliant with applicable laws and regulations before importation. 15 U.S.C. 2063(a). A

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regulated consumer product is one that is subject to a consumer product safety rule under the CPSA or similar rule, ban, standard, or regulation under any other law enforced by the Commission that is imported for consumption or warehousing, or distributed in commerce. *Id.*

CPSC and CBP have the authority to enforce certificate requirements at importation. Section 14(g) of the CPSA requires that a certificate: “accompany the applicable product or shipment of products covered by the same certificate,” be furnished to each distributor or retailer of the product, and, upon request, be provided to the Commission and to CBP. 15 U.S.C. 2063(g). The Commission has admissibility authority for importing consumer products and substances that are within the CPSC’s jurisdiction under section 17 of the CPSA (15 U.S.C. 2066) and section 14 of the Federal Hazardous Substances Act (“FHSA”) (15 U.S.C. 1273). Unless the Commission allows a product to be reconditioned for importation, section 17(a)(2) of the CPSA requires refusal of admission and destruction of any product offered for import that, among other things, is not accompanied by a certificate required under section 14 of the CPSA, or a certificate required by any rule or regulation issued under section 14. 15 U.S.C. 2066(a)(2). CBP has the authority to seize and destroy products offered for importation under the Tariff Act, codified at 19 U.S.C. 1595a(c)(2)(A), where the importation or entry of such products is subject to any restriction or prohibition which is imposed by law relating to health, safety, or conservation and such products are not in compliance with the applicable rule, regulation, or statute.

CPSC works with CBP to review and inspect cargo and to clear compliant consumer products for importation into the United States. CPSC also works with CBP to enforce CPSC regulations and to destroy products that violate the law and cannot be reconditioned for importation. 15 U.S.C. 2066. For example, section 17 of the CPSA states that, upon the

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Commission's request, the Secretary of the Treasury has the authority to obtain samples of products offered for importation, without charge, and deliver such samples to the Commission for inspection. 15 U.S.C. 2066(b). An admissibility determination may be deferred to allow an importer to recondition products for entry. 15 U.S.C. 2066(c). CPSC and CBP have authority to supervise the reconditioning of products for entry that are still under CBP's bond. 15 U.S.C. 2066(d). If these products cannot be reconditioned, they must be refused admission and destroyed, unless the Secretary of the Treasury permits export in lieu of destruction. 15 U.S.C. 2066(d) & (e).

CPSC has the authority to require electronic filing of certificates through a rulemaking. Section 14(g)(4) states that in consultation with CBP, the CPSC may, by rule, provide for the electronic filing of certificates up to 24 hours before the arrival of an imported product. 15 U.S.C. 2063(g)(4).

### *C. Requirements for Certificates*

The Commission recognizes two types of certificates under section 14(a): Children's Product Certificates, or "CPCs," and General Certificates of Conformity, or "GCCs" (CPCs and GCCs are collectively referred to as "certificates"). 15 U.S.C. 2063(a). CPCs must be based on third party testing conducted by a laboratory whose accreditation has been accepted by CPSC. GCCs must be based on a test of each product or a reasonable testing program. *Id.*

Sections 14(a) and 14(g) of the CPSA set forth minimum content requirements for certificates, including: product identification; each applicable rule, ban standard, or regulation; the manufacturer (including the importer) or private labeler issuing the certificate; any third party conformity assessment body on whose testing the certificate depends; the date and place of manufacture; the date and place where the product was tested; the name, full mailing address,

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and telephone number of each party identified on the certificate; and the contact information for the individual responsible for maintaining records of test results. 15 U.S.C. 2063(a)(1), (a)(2)(B), and (g)(1). Additionally, certificate content must be legible and in English. The content may be in any other language as well. 15 U.S.C. 2063(g)(2).

The Commission promulgated a final rule on “certificates of compliance” on November 18, 2008 (73 FR 68328), which is codified at 16 CFR part 1110 (“part 1110”). Among other things, part 1110 limits the parties who must issue a certificate to the importer, for products manufactured outside the United States, and, in the case of domestically manufactured products, to the manufacturer, and allows certificates to be in hard copy or electronic form.

On May 13, 2013, the Commission issued a notice of proposed rulemaking (“NPR”) to amend part 1110 (78 FR 28080). The NPR proposed to clarify certificate requirements in light of new rules related to testing and labeling of children’s products, and component part testing, 16 CFR parts 1107 and 1109, and to require electronic filing of certificates for imported products, as provided in section 14(g)(4) of the CPSA. In the NPR, proposed § 1110.13(a) states that to meet the statutory requirement that finished product certificates “accompany” products or product shipments, for regulated finished products that are imported for consumption or warehousing, “the importer must file the required GCC or CPC electronically with the CBP at the time of filing the CBP entry or the time of filing the entry and entry summary, if both are filed together.” 78 FR at 28108.

### *D. ITDS Goals and CBP’s Authority to Conduct National Customs Automation Program Tests*

The ITDS is an electronic data interchange system whose goals are to eliminate redundant information requirements, efficiently regulate the flow of commerce, and effectively

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enforce laws and regulations relating to international trade by establishing a single portal system, operated by CBP, for the collection and distribution of standard electronic import and export data requiring by participating federal agencies. All federal agencies that require documentation for clearance or licensing the importation of cargo are required to participate in ITDS. The Customs Modernization provisions in the North American Free Trade Agreement Implementation Act provide the Commissioner of CBP with authority to conduct limited test programs or procedures designed to evaluate planned components of the National Customs Automation Program (“NCAP”), which includes ACE. The PGA Message Set test described in this notice is in furtherance of the ITDS and NCAP goals.

### *E. The “Single Window” Approach*

President Obama, on February 19, 2014, issued Executive Order 13659, *Streamlining the Export/Import Process for America’s Businesses* (“EO 13659”), which requires certain federal agencies to enhance significantly their use of technology to modernize and simplify the trade processing infrastructure. Specifically, EO 13659 requires applicable government agencies to use CBP’s ITDS, and supporting systems, such as ACE, to create a “single window” through which businesses will electronically submit import-related data for clearance. EO 13659 envisions and is working toward a simpler, more efficient portal for trade use, to benefit the trade and government agencies that have related authorities and responsibilities.

Participating agencies have until December 31, 2016 to use ACE as the primary means of receiving agency-specific standardized import data. As an independent agency, CPSC is not bound by EO 13659, but electronic filing of certificate data will aid CPSC in focusing the agency’s resources to clear products more efficiently and improve enforcement of our safety regulations at the ports.

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### *F. Test Purpose and Goal*

Consumer protection, by preventing noncompliant products from ever reaching American homes and American children, was a primary impetus for passage of the CPSIA. Testing and certification to mandatory standards, such as those for lead and phthalate content, toys, and durable infant products, were intended to prevent the manufacture, importation, and distribution of noncompliant products. Currently, certificates for imported consumer products are made available to CPSC in various ways:

- paper certificates are placed inside shipping containers;
- electronic certificates are made accessible through a uniform resource locator (“URL”); or
- electronic certificates are provided via email (only upon request by CPSC).

To improve CPSC’s enforcement efforts at our ports, the Commission proposed in the NPR to amend part 1110 to require that certificates be filed electronically with CBP at the time of entry, or at entry summary, if both are filed together. The NPR presented two options for electronic filing of certificates: (1) images (a PDF file using CBP’s Document Imaging System, or DIS), or (2) data elements that can be uploaded into CBP’s database and electronically provided to CPSC for review (CBP’s PGA Message Set). Comments received on the NPR to amend part 1110, as well as feedback from stakeholders arising out of CPSC staff’s September 18, 2014 workshop on electronic filing (“the 2014 efilting workshop”) (79 FR 37968 (July 3, 2014)), indicate that many industry stakeholders prefer to file data elements for certificates with CBP, rather than provide PDF files. Accordingly, CPSC will focus its resources on a test with CBP on electronic filing of certificate data elements, using the PGA Message Set.

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Information and feedback from the test will be used to inform the Commission in striving to improve and streamline the statutorily mandated import certificate process.

### **II. Certificate Data Test**

The test will allow two different methods of filing certificate data, using the PGA Message Set: (1) filing all certificate data at time of entry (“Full Certificate PGA Message Set”), or (2) filing only a reference to certificate data stored in a Certificate Registry maintained by CPSC (“Certificate Registry and Reference Certificate PGA Message Set”). Certificate data for finished products, either the complete data set or the registry reference, would be submitted through the PGA Message Set as part of an ACE entry, or ACE entry summary if both entry and entry summary are filed together. Certificate data, along with entry data, would then be made available to CPSC for validation, risk assessment, and admissibility determinations at entry, thereby facilitating trade. The data would be used to review consumer product entry requirements and allow for earlier risk-based admissibility decisions by CPSC staff. Additionally, because it is electronic, the PGA Message Set would eliminate the necessity for submission and subsequent handling of paper documents.

Staff from CBP and CPSC have participated in multiple discussions with stakeholders regarding the proposed test, which CPSC refers to as the “eFiling Alpha Pilot.” For additional information on these meetings and the test concept, please refer to the slides, audio recordings, and meeting minutes for these meetings, which are available at:

<http://www.cbp.gov/trade/stakeholder-engagement/webinars>, and at:

<http://www.cpsc.gov/en/Newsroom/Multimedia/?vid=73411>.

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### A. *Full Certificate PGA Message Set*

To file data electronically with CBP, required certificate information for finished products would need to be filed in CBP's ACE system. The proposed Full Certificate PGA Message Set test would evaluate electronic filing of certificates for finished products using the certificate information set forth in the NPR to amend part 1110, specifically proposed § 1110.11. 78 FR at 28108. The following is a summary of the product information on a certificate:

1. Identification of the finished product;
2. Certificate date;
3. Scope of the finished products covered by the certificate;
4. Each consumer product safety rule to which the product is being certified;
5. Certifier (name and contact information);
6. Custodian of test results (name and contact information) and option to include a URL for the test records;
7. Date and place where the finished product was manufactured, produced, or assembled, including the identity of the party;
8. Date and place where the finished products were tested, or statement of the testing exclusion(s) relied upon;
9. Parties on whose testing the certificate depends (name of first party or third party laboratory and contact information); and
10. An attestation by the certifier that the finished products comply with the applicable rules.

The preamble to the NPR to amend part 1110 explains the required certificate data. *See* 78 FR at 28085 – 88. As reviewed in section I.C of this notice, most of the information listed above is

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required to be on a certificate pursuant to sections 14(a) and (g) of the CPSA. If a test participant chooses to use the Full Certificate PGA Message Set, all information on a certificate would be filed for each product on a per-line basis in ACE.

CPSC drafted a supplemental CATAIR guideline on filing certificates through the PGA Message Set that describes the technical specifications for filing certificates using the Full Certificate PGA Message Set, as well as the Registry and Reference Certificate PGA Message Set (described in section II.B below). The supplemental CATAIR guidelines will be made available before CBP initiates the test and will be posted on <http://www.cbp.gov/trade/ace/catair>. Technical comments on CPSC's supplemental CATAIR guidelines should be submitted in accordance with the instructions in the **ADDRESSES** section at the beginning of this notice.

### *B. CPSC Certificate Registry and Reference Certificate PGA Message Set*

The Certificate Registry concept arises out of discussions at CPSC staff's 2014 efilng workshop. Stakeholders at the workshop noted that manufacturers and importers sometimes use one certificate for multiple products or entries, and explained that it would be inefficient for importers (including brokers) to re-enter the same certificate data more than once for the same product. Stakeholders noted that other agencies have existing databases that can be referenced during the CBP entry process without having to re-enter repeatedly large amounts of data. Stakeholders also discussed the concept of a blanket certificate that applies to multiple shipments. Participants expressed concern about added costs and time for importers to enter certificate data for each regulated product and the need for accurate data entry. Customs brokers also expressed concern about lack of access to data elements for certificates. For example, express carriers were concerned about meeting entry requirements during off-hour times when business personnel were unavailable for consultation. Stakeholders expressed concern that any

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requirement to re-enter large amounts of data, or lack of access to the required data, may slow the import process.

After considering stakeholder comments and concerns, CPSC has decided to include a Certificate Registry in the test to inform the Commission whether this concept alleviates some of the concerns expressed at the 2014 efilings workshop. Instead of filing complete certificate data in ACE with each entry, participants can elect to pre-file certificate information into a Certificate Registry before filing an entry with CBP. Certificate information will be the same as that described in section II.A, above, meaning certificate information for finished products using the elements set forth in the NPR to amend part 1110, specifically proposed § 1110.11. 78 FR at 28108. The Certificate Registry will be created and maintained by CPSC. Use of the registry will be voluntary. Firms can use the registry to enter one certificate at a time and to manage certificates and certificate information; or firms with established certificate databases or processes can provide certificate information for many products electronically in a batch upload.

Once a certificate is filed in the Certificate Registry, filers will only need to provide a reference, or identifier, to the certificate using the PGA Message Set during the entry process, rather than entering all data for the certificate multiple times. Firms that choose to use the Certificate Registry only would need to provide their filer with a certificate identifier, and would not need to provide all data elements for each regulated product being imported. Using the Certificate Registry should minimize data entry; reduce costs and filing time; and allow firms to manage, update, and re-use certificate data in the registry. CPSC demonstrated a prototype of the Certificate Registry at the May 13, 2015 public meeting with the COAC working group. A webcast of this meeting can be viewed here:

<http://www.cpsc.gov/en/Newsroom/Multimedia/?vid=73411>.

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### **III. Test Participant Eligibility, Selection Criteria, and Responsibilities**

This document announces CPSC's plan, in consultation with CBP, to conduct a test for the electronic filing of CPSC certificate of compliance data with CBP for certain regulated consumer products or substances within CPSC's jurisdiction that are imported into the United States. Test participants will work with CPSC and CBP to refine electronic filing of certificates through the PGA Message Set, by test filing all data elements in PGA Message Set, or by using the Certificate Registry, and filing a reference to certificate data through PGA Message Set. CBP and CPSC are seeking small and large companies with an assortment of CPSC-regulated products to participate in the test.

To be eligible to apply as a test participant, the applicant must:

- Import regulated consumer products within the Commission's jurisdiction;
- File consumption entries and entry summaries in ACE, or have a broker who files in ACE;
- Use a software program that has completed ACE certification testing for the PGA Message Set;
- Provide oral and written feedback on all aspects of the test as requested by CPSC, including information on costs to build to the requirements and time necessary to file certificate data;
- Work with CPSC and CBP to test electronic filing of certificates using ABI to file complete certificates through the Message Set, or references to certificates in the Certificate Registry; and
- Have a history of compliance with CPSC requirements.

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Because the feedback on the test will be used to inform the open rulemaking related to part 1110, participant feedback will be publicly available.

CPSC, in consultation with CBP, will select participants based on the eligibility requirements, application date, the number and type of regulated consumer products imported, how applicants would file certificates (Full Certificate PGA Message Set or Certificate Registry and Reference Certificate PGA Message Set), port locations, and the goal of having a diverse cross section of the trade community participate. The number of participants will be limited in the discretion of CPSC, but will in no event exceed nine participants. Selected applicants will participate in the test at the discretion of CBP and CPSC.

#### **IV. Application Process**

Any party seeking to participate in the test should email the company name, contact information, filer code, port(s) at which they are interested in filing, and an explanation of how they satisfy the requirements for participation to: [efilingpilot@cpsc.gov](mailto:efilingpilot@cpsc.gov) on or before [INSERT DATE THAT IS 45 DAYS AFTER PUBLICATION IN THE FEDERAL REGISTER] and throughout the duration of the test. CPSC will consider applications to participate until the test capacity of nine participants is filled. Requests to participate in the test should contain the subject heading: “Application to participate in PGA Message Set Test.” Applicants may be contacted directly for additional information in connection with the selection process. Selected participants will be notified by email. Selected test participants may have different starting dates. A party providing incomplete information, or otherwise not meeting the participation requirements, will be notified by email and given the opportunity to resubmit the application. Applicants who are not selected also will be notified by email.

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### **V. Advantages of Participation**

During the period of participation in the eFiling Alpha Pilot, test participants can expect the following:

- Opportunity to work directly with CBP and CPSC in pre-implementation stage of e-filing certificates;
- Ability to provide feedback and experience that will inform ultimate e-filing requirements;
- Ability to trouble-shoot systems and procedures;
- Reduction of product safety tests on goods imported;
- In the event of an examination, shipments will be conditionally released to the importer's premises for examination;
- In the event of testing, samples will receive "front of the line testing" from CPSC laboratories; and
- If destruction of products is required, participants may be allowed to destroy products in lieu of redelivering the product to CBP for destruction.

### **VI. Test Duration**

The test tentatively is scheduled to be operational by July 2016. Upon selection into the test, test participants will be expected to begin work promptly with CBP and CPSC to define and refine requirements. Once the test is operational, the test is expected to run for approximately six months or until concluded or extended by the issuance of a *Federal Register* notice announcing the extension or conclusion of this test.

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**VII. Paperwork Reduction Act**

In the NPR to amend part 1110, CPSC proposed to expand the existing Office of Management and Budget (“OMB”) control number for CPCs (3041-0159) to include electronic filing of certificates with CBP, and CPSC also sought a new control number for GCCs that would include electronic filing. 78 FR at 28092-28106. OMB has assigned a temporary control number for GCCs, which is 3041-0163. OMB approval for a final, industry-wide requirement to electronically file GCCs and CPCs in ACE is unlikely to occur until issuance of a final rule to amend part 1110. Accordingly, for this initial test of electronic filing of certificates, CPSC will accept fewer than 10 participants, and the test will be exempt from the requirements of the Paperwork Reduction Act of 1995. If CPSC decides to participate in a larger-scale test, we will provide notice and seek an OMB control number specifically for such test.

**VIII. Confidentiality**

All data submitted and entered into ACE is subject to the Trade Secrets Act (18 U.S.C. 1905) and is considered confidential, except to the extent as otherwise provided by law. As stated in previous notices, participation in this or any of the previous ACE tests is not confidential and upon a written Freedom of Information Act (“FOIA”) request, a name(s) of an approved participant(s) will be disclosed by CPSC or CBP in accordance with 5 U.S.C. 552.

Dated: \_\_\_\_\_

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Todd A. Stevenson, Secretary  
Consumer Product Safety Commission