

LOG OF MEETING

3/30/94  
21 MAR 1994

DIRECTORATE FOR ENGINEERING SCIENCES

**SUBJECT:** Joint campaign between CPSC and Heat-Tape Manufacturers to persuade consumers to replace old heat tapes with new ones.

**DATE OF MEETING:** March 4, 1994

**PLACE:** East-West Towers  
Room 715

**LOG OF ENTRY SOURCE:** Alberta Mills, ESEE

**DATE OF ENTRY:** March 4, 1994

**COMMISSION ATTENDEES:**

Carolyn Meiers, EPHF  
Dennis McCoskrie, ESEE  
Stacey Reuben Mesa, ESEE  
Elizabeth Haught, FO  
Alberta Mills, ESEE

**NON-COMMISSION ATTENDEES:**

Edward F. Gerwin, Jr., Winston & Strawn  
Michael O'Toole, Jr., Easy-Heat, Inc.  
Diane Zipursky, Wiley, Rein & Fielding  
Gary Hauptman, Trial Magazine

**MEETING SUMMARY:**

Mr. McCoskrie stated that the purpose of the meeting was to discuss a cooperative campaign between CPSC and Easy-Heat to encourage heat tape users to replace their unlisted heat tapes after three years of use. He mentioned that the three years was selected because manufacture's representatives at the UL/CSA Harmonization Meetings could not agree on a time and that CPSC intends to warn heat tape users of the dangers involved in not replacing old unlisted heat tapes. Mr. O'Toole stated that Easy Heat is interested in accomplishing replacement of damaged tapes, but by means of a different campaign that does not warn of danger.

Mr. Gerwin stated that this campaign must be cooperative and not a joint one between CPSC and Easy Heat. He stated that they would welcome suggestions and ideas from CPSC to persuade consumers to replace old heat tapes but pointed out that a campaign based upon warnings of a fire hazard would be inconsistent with their position. Mr. O'Toole asked how CPSC intends to communicate their message to the public. He pointed out that Easy-Heat's focus is on new customers, not owners of old ones.

Ms. Reuben Mesa said that she has been in contact with insurance and real estate associations for suggestions on how to reach consumers. Ms. Haught also mentioned that she has been in contact with manufacturers and HUD and CPSC public affairs field staff for the same purpose. She said field staff will let her know who is being receptive and should anything be published she would receive a copy. She also mentioned that in the past, hardware stores displayed posters or shopping bags carrying the safety message.

Ms. Reuben Mesa also mentioned that although CPSC does not currently have funds allocated for it, television would be an effective vehicle to reach the average consumer who may not read printed materials.

Mr. O'Toole inquired as to whether the CPSC Safety Alert illustrations of heat tapes was intended to suggest a particular brand or was simply generic. He stated that it resembles a competitor's brand. Ms. Reuben and Mr. McCoskrie assured him that it was generic but that CPSC will look into it.

Mr. O'Toole mentioned that Easy Heat has not located a magazine or other medium to reach the targeted audience. He said they have a list of mobile home park owners and depend on them to get the message out to their residents. He said that their budget does not allow for video-tape advertising, or for other support of CPSC's campaign.

Mr. Gerwin raised concerns about the validity of fire, death and injury statistics used in CPSC's Safety Alert. He stated that the statistics constitute an obstacle to the industry's working jointly with CPSC on a media campaign. They have reviewed incident reports which indicated that their product was not the cause of the problem but was ruled to be, nevertheless. Mr. McCoskrie said he understood their concern but that the statistics have to be disseminated to communicate the possible hazards of heat tapes and to motivate consumers to replace them. Mr. Gerwin said that, apart from the statistics, Easy-Heat does not object to the other material presented in the Safety Alert. He further stated that Easy-Heat possibly may use material from the Safety Alert in its media campaign. Mr. O'Toole promised to send the combined packaging/instructions and other messages for their tapes, when they are completed. Mr. Gerwin once again stressed that since they do not want to promote messages at variance with CPSC; they would like to have information from CPSC.

Ms. Meiers adjourned the open portion of the meeting.