

Exhibit 66

CPSC Defect Recall Data

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CPSC Recall Data Analysis

- Data analyzed for **closed** cases that have a Corrective Action Plan date between FY 2013 and FY 2016.
- Total number of 865 closed cases analyzed
- Correction rates were determined by comparing the number of reported corrections made to the number of reported products distributed at the manufacturer, distributor, retailer, and consumer levels.

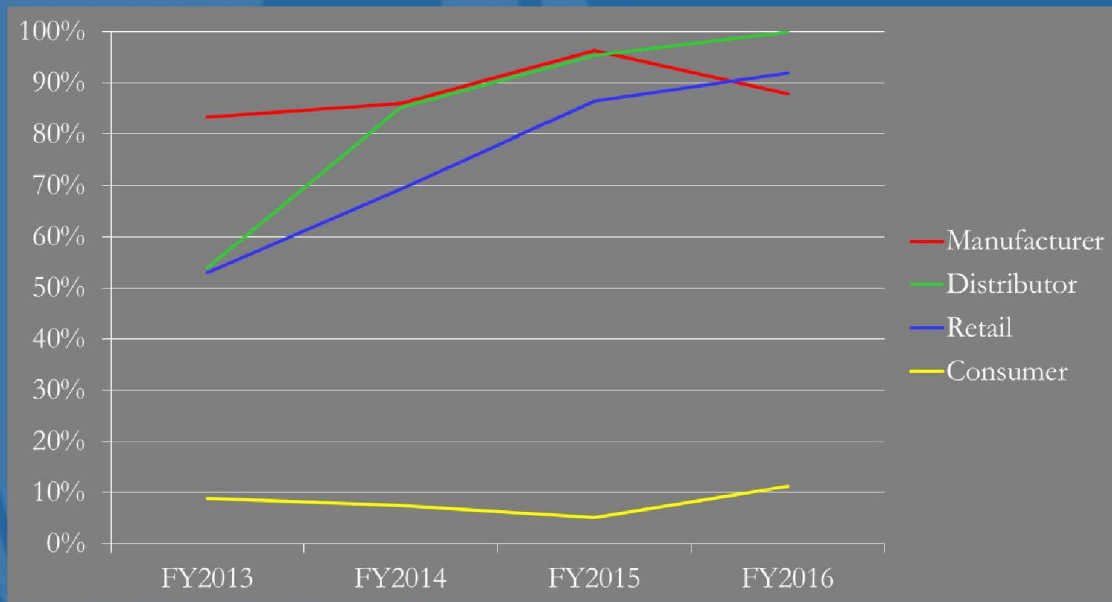
CPSC Recall Data

- Changes to recall data collection and recordation
- Overall correction rate = 65%
- Focuses on all levels in the distribution chain
- On average, 46% of cases reported to the CPSC lead to a recall or recall alert.

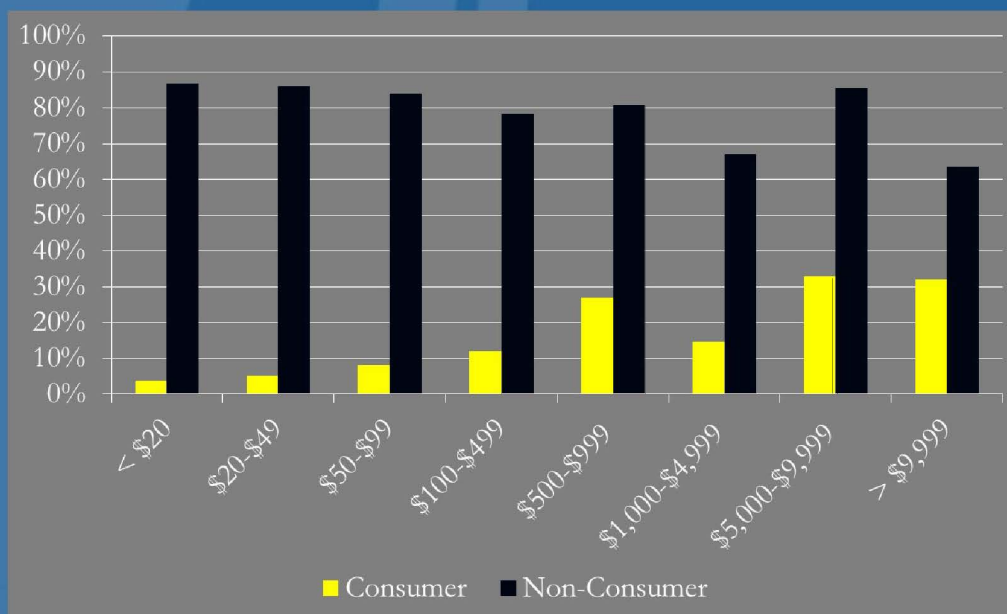
Correction Rate Analysis

- Distribution Levels
- Price
- Product Category
- Correction type
- Recall type

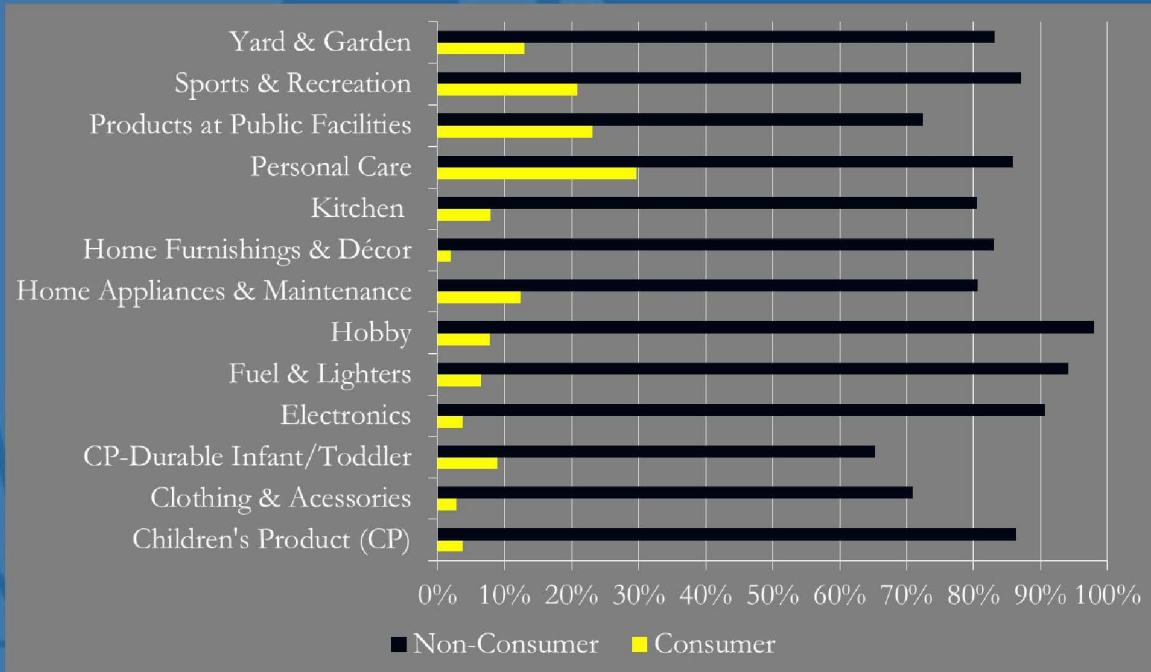
Average Correction Rate by Distribution Levels



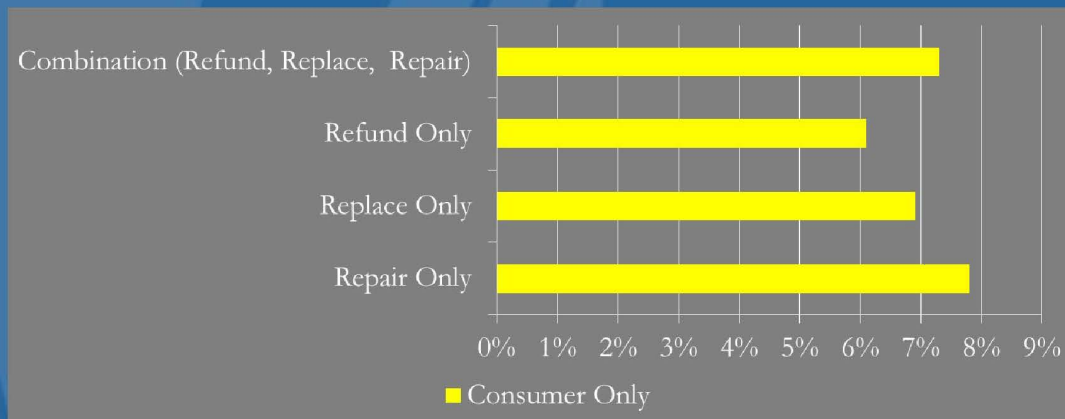
Correction Rates by Retail Price



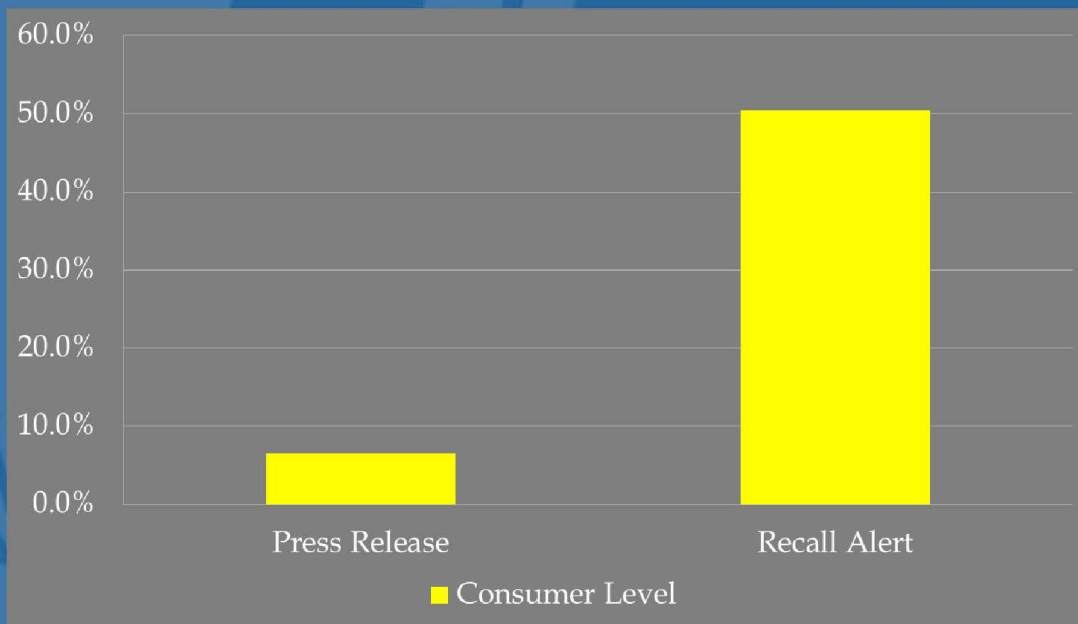
Correction Rate by Product Category



Correction Type



Correction Rate by Recall Type



Recall Alerts vs. Press Releases

- Higher Correction Rates w/ Recall Alerts at all Levels
 - Recall Alerts require the recalling company to demonstrate that they are able to contact 95% of affected consumers through direct notification (i.e. email, mail, telephone, etc.)
- Recall Alerts have a greater consumer correction rate at 50%
- Press Releases have a consumer correction rate of 6%

Additional Findings

- FY 2016 achieved high correction rates for all distribution levels, except Manufacturer.
- Correction rates for products designated with a higher risk do not necessarily motivate consumers to take advantage of remedy.
- There were 3 cases in this data set where a death occurred after the recall.
- Price points appear to be a driver in consumer motivation.
- It is difficult to assess when consumer disposes of product in lieu of a remedy.
- Social media was used in 199 cases. The type of social media used was not recorded. Number of cases that used social media:

FY 2014- 36
FY 2015- 139
FY 2016- 24

Conclusion

- CPSC recognizes the challenges with consumer correction rates.
- CPSC wants to collaborate with all stakeholders to find ways to provide direct notice to consumers and improve recall effectiveness.