



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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February 17, 2017

Mr. Erik Pritchard
General Counsel
Recreational Off-Highway Vehicle Association
2 Jenner Street, Suite 150
Irvine, CA 92618-3806

Dear Mr. Pritchard:

On December 1, 2016, CPSC staff participated in a public meeting with members of the Recreational Off-Highway Vehicle Association (ROHVA) to discuss the tilt table hangtag design based on requirements in ANSI/ROHVA 1-2016 *American National Standard for Recreational Off-Highway Vehicles*.^{1,2} ROHVA contracted with Applied Safety and Ergonomics (ASE) to develop the tilt table hangtag, based on the requirements in ANSI/ROHVA 1-2016, and representatives from ASE presented their findings at the meeting. ASE presented a sample tilt table hangtag design that included a prominent display of the ROV's tilt table angle at two-wheel lift, followed by a brief description of the test protocol and other statements required by ANSI/ROHVA 1-2016. The hangtag measured 4 inches by 6 inches, with a green border and other font aspects that follow recommendations by the American National Standard ANSI Z535 series for safety communication. The back side of the hangtag presented other ROV safety warnings, as required by ANSI/ROHVA 1-2016.

CPSC staff appreciates the opportunity to comment on the hangtag design and is pleased to see ROHVA taking steps to improve the voluntary standard with more specific hangtag requirements. Staff believes that the proposed hangtag design clearly displays the vehicle's maximum tilt table angle at two-wheel lift, and that public display of this information will encourage manufacturers to increase the rollover resistance of ROVs. Staff recommends including additional messaging to help consumers interpret the tilt table angle, given the

¹ 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.

² Meeting log dated December 1, 2016. Retrieved from: <https://www.cpsc.gov/s3fs-public/ROHVAHangTagMeetingLog.pdf>.

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conclusion that past focus group participants had difficulty in understanding the connection between tilt table angle and vehicle safety.³ Staff recommends future development work, such as focus group testing, toward creating effective messaging for consumer comprehension of the tilt table angle value after the effectiveness of the proposed hangtag has been evaluated.

Thank you for allowing us to comment. CPSC staff looks forward to continued cooperation with ROHVA regarding ROV safety. 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 fluid and cursive, with a large initial "C" and "P".

Caroleene Paul

cc: Patricia Edwards, CPSC Voluntary Standards Coordinator

³ EurekaFacts, LLC (2015). Evaluation of Recreational Off-Highway Vehicle (ROV) Hangtag: Cognitive Interview and Focus Group Testing. Retrieved from: <https://www.cpsc.gov/s3fs-public/pdfs/ROVHangtagEvaluationReport.pdf>.