



JIANSHE USA INC.  
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Walnut, CA 91789

Aug 11, 2009

Delivery by Fax and US Mail

Howard Tarnoff  
Lead Trial Attorney  
Division of Compliance  
Office of the General Counsel  
United States Consumer Product Safety Commission  
4330 East-West Highway  
Bethesda, Maryland 20814

WER/PRV/LBR NOTIFIED  
COMMENTS:  YES  NO  
 OVERRULED;  ATTACHED  
 EXCISIONS/FOLA Hxs.   
 DO NOT RE-NOTIFY  RE-NOTIFY

Re: Jianshe USA Inc. Action Plan.

Action Plan for CPSC

Jianshe USA Inc. ("Jianshe") is fully committed to the goal of reducing ATV-related accidents. We have implemented new policies in accordance with the rules set forth by Section 232 of the Consumer Product Safety Improvement Act of 2008. The actions outlined below are part of our continuing effort to promote safe and responsible use of our ATVs.

Age Recommendations

Jianshe will only recommend, market, and sell ATVs for use under the age category/speed guidelines specified at Section 6 of the ANSI/SVIA 1-2007 Standard for ATVs ("the ATV Standard"). Jianshe will not recommend, market, advertise, or sell adult-sized ATVs for the use of persons less than 16 years of age. Jianshe will use its best efforts to ensure that our dealers comply with these requirements.

Dealer Monitoring

Jianshe requires that its dealers verify the intended ATV rider's age prior to selling that rider or his/her guardian an ATV. Jianshe warranty registration cards require the identification of the intended rider's name and date of birth to ensure that dealers do not sell Jianshe ATVs to under-aged riders.

Jianshe will use its best efforts to obtain dealer compliance with the age recommendation requirements of the ATV Standard. Jianshe will conduct a minimum of 50 on-site, undercover inspections per year of our authorized ATV dealers by means of independent, undercover investigators (also known as "secret shoppers") to ensure that these dealers follow age requirements and other safety related practices during sales or promotional activities. Jianshe

will conduct these inspections of each of its dealers at least twice a year. Jianshe will also modify the visitation criteria of its field support staff so that inspecting for dealer compliance becomes a normal function of the dealer visit.

When Jianshe learns of dealers who do not abide by the age requirements of the ATV Standard, it will arrange follow-up inspections. If Jianshe finds evidence of continued violations, Jianshe will take remedial action, to the extent permitted by applicable state and local laws, up to and including possible termination or non-renewal of the dealer's contract with Jianshe.

### **Information & Education Program**

Jianshe will develop a new informational and educational effort to communicate age requirements, passenger dangers, and other safety related information to consumers, through its websites, literature and posters in dealer's stores. This program will be implemented immediately for a 10 (ten) year duration with monthly reviews conducted by Jianshe's management.

### **Safety Reminders**

Jianshe will use safety reminders as part of its educational and informational effort by doing the following:

1. Within a few days of each consumer purchase, Jianshe will utilize the trained staff of the 24-hour hotline to call each new purchaser to ensure that customers were properly notified by the dealer about taking the ASI Safety Training course and about the \$100 incentive for completing the course.
2. A few weeks after each consumer purchase, Jianshe will also send a letter or email to all purchasers of Jianshe ATVs to remind the purchaser about the importance of taking the ASI Safety Training course.

### **Development of Safety Devices**

We feel the most critical safety issue is that there must be an effort to deter children under the age of sixteen from operating adult-sized ATVs or riding as passengers. We will continue to work with the CPSC in this effort, and Jianshe will continue to work on additional safety devices to aid responsible parents in supervision. One of those could be some type of safety key requirement for adults using the vehicle, as is used currently in racing ATVs, whereas a safety wrist harness would be attached to the adult-sized ATV for safety, and if the adult leaves the vehicle, the vehicle would stop running and reduce the dangers of small children being attracted to a running ATV. Jianshe will make technical advances on ATVs to prevent unwanted stop and start functions, and to keep young children off of unattended, idling adult ATVs.

### **Boy Scouts**

In continuing education efforts, Jianshe will pursue creating an Eagle Scout award program with the Boy Scouts of America to develop an awareness of the dangers and the required training and safety within the local community. Jianshe and its dealers would develop this program by giving the Eagle Scout candidate registration in an ATV Safety Institute training class and the loan of an ATV vehicle from the local dealer to promote ATV safety.

#### Internet

In promoting ATV safety and educational efforts, Jianshe will also provide its safety video for use for the Boy Scouts of America's website, to distribute its safety message and promote the safe use of ATVs. Jianshe will provide through website mediums such as the BSA and other non-profit groups that have a core constituency of young adults, both information and educational materials on the dangers of ATVs. Through internet links, Jianshe will continue its educational outreach on a continual basis. Through local, state and national non-profit groups, Jianshe will make an annual effort to further ATV safety. By renewing the safety message each year, Jianshe will be keeping the message of ATV safety, fresh and alive, just like its ATV customers.

To get the word out on ATV safety and to make sure it gets to a young audience, Jianshe will be putting its own video of ATV safety on You Tube. This video will be a short video to tell of the importance of taking a hands-on ATV safety training course and demonstrating dangerous things not to do on an ATV. This will get the attention of younger You Tube internet visitors and still be non-commercial enough to get the point across of safety.

#### Dealers

Jianshe will create and disseminate a safety poster for posting by all of Jianshe's dealers. This poster will feature safety and educational information containing ATV safe riding messages and encouraging correct ATV sizing and the need to take the hands-on safety training.

Jianshe will encourage dealers to promote the importance of ATV safety by recommending that each purchaser visit the ASI's website to learn more about the safe operation of an ATV. In addition, Jianshe will provide dealers information about the dangers of unsafe riding.

#### Targeted Distribution of Safety Materials

Jianshe intends to distribute the aforementioned safety posters to pediatric offices, schools, and public libraries on a national level so that these materials may target children in the hopes of keeping children informed of safety precautions. Additionally, Jianshe intends to distribute safety brochures to dealers in order to target individual consumers. Additionally, Jianshe will mail safety brochures directly to individual consumers subsequent to their ATV purchase in order to act as a post-purchase reminder of safety measures that a consumer should abide to. Further, these brochures will incorporate valuable safety messages to parents in regards to child safety warnings and precautions.

#### Print Ad Campaign

Jianshe's print advertisements will feature safety messages communicating the importance and availability of safety training. Jianshe's print advertisements will be in ATV Rider Magazine quarterly. Jianshe's print advertisements will feature safety messages for 10 (ten) years.

### **ATV Labels**

All Jianshe ATVs will have the warning labels required by Section 4.23 of the ANSI/ SVIA 1-2007 Standard for ATVs ("the ATV Standard"). This includes general, age recommendation, passenger, tire pressure, and overloading labels.

### **Owners Manuals**

All Jianshe ATVs will be sold with an owner's manual that complies with the requirements of Section 4.21 of the ATV Standard.

### **ATV Hangtags**

All Jianshe ATVs will have the hang tags required by Section 4.24 of the ATV Standard. The hang tags will include information about age recommendations, vehicle category, training availability, and safety messages. Jianshe will use its best efforts to require dealers to display the hang tags on all new ATVs. Jianshe field representatives will spot check that tags remain on ATVs on display at ATV dealerships.

### **Training**

Jianshe will offer free, hands-on, interactive training to all Jianshe ATV purchasers. This free training will be extended to the buyers' immediate relatives who are age appropriate for the ATV purchased. This training will be conducted through the existing educational programs of the ASI.

In addition, after completion of the ASI course, the rider will qualify for an incentive worth \$100. The \$100 incentive for training will include at least \$50 in cash, with the balance offered (at the consumer's choice) as a rebate for already purchased safety equipment or a credit towards the purchase of new safety equipment.

Consumers will be notified about the availability of the free, hands-on training for a Jianshe ATV purchaser and the buyers' immediate relatives who are age appropriate for the ATV purchased, before, during and after the purchase of the Jianshe ATV.

Before a consumer makes a purchase of a Jianshe ATV, the consumer will have an opportunity to view Jianshe sponsored posters positioned in the store, displaying a rider with the proper safety helmet and safety gear on and announcing the Jianshe-sponsored free, hands-on training and the additional incentive of a \$100 for completing the ASI training program.

During the purchase, the consumer will be asked to read, and sign a document acknowledging all of the safety warnings, hazards and dangers of riding and driving an ATV. The purchaser has to read and sign this document in order to receive the manufacturer's warranty on the ATV.

After the purchase, the purchaser is told by the dealer that he can sign up now for the ASI training program. The dealer will also give the purchaser of the Jianshe ATV a coupon to get reimbursed for the full cost of the ASI training program when finished.

And, finally, the Jianshe ATV purchaser will receive in the mail or by email shortly after the purchase from Jianshe, a letter of congratulations from Jianshe of the ATV purchase and another reminder of the offer for the Free, hands-on training program of the ASI and the \$100 incentive on completing the safety training program.

Each Jianshe ATV will have a form included in the ATV to fill out for the dealer to receive direct compensation from Jianshe for the \$100 for the free training completion incentive, and to have the dealer reimbursed for the ASI training that was completed.

### **ATV Safety Video**

Jianshe will provide a Safety Video in DVD-Format to its distributors for dissemination to all retail purchasers of Jianshe ATVs. The video shall comply with all requirements described at Section H.3.b.(4)(b) and paragraphs II.A and II.C of Appendix I of the 1988 ATV Consent Decree. The Safety Video may be used by dealers at the point of purchase for demonstration of safety issues and to highlight the need for and availability of hands-on safety training.

### **Advertising**

When preparing and presenting advertising and promotional materials, Jianshe will depict the safe and responsible operation of ATVs. The use shown will be appropriate to the ATV, the age of the operator, and the depicted situation. ATV riders depicted in advertising and promotional materials will wear helmets and full protective gear. These marketing materials and presentations will contain the safety messages described in Section J.1 and Appendix K of the 1988 ATV Consent Decree and will contain information about the availability of operator training. Jianshe will use its best efforts to promote dealer compliance with the advertising requirements, including conditioning cooperative advertising funding on such compliance.

### **Toll-free ATV Hotline**

Jianshe will provide a toll-free, 24-hour hotline to respond to consumer inquiries as described at Section H.4 of the 1988 ATV Consent Decree. Agents will be trained to provide safety and training information, including age recommendations. Jianshe will also provide to callers, free of charge, appropriate copies of safety-related materials. Jianshe's toll-free number will be printed in all owners' manuals, ATV web-sites and other promotional materials.

### **Safety Alert**

Jianshe will supply its dealers "Safety Alert" documentation to be provided at the point of purchase to all retail purchases of Jianshe ATVs. The document will contain the same substantive safety information as the Safety Alert described at Section H.3.b.(4)(c) and Appendix J of the 1988 ATV Consent Decree. This information includes: death and injury statistics for ATVs, safety rules, age recommendations and the availability of safety training. .

### **3-Wheel ATV**

Jianshe has never manufactured any such vehicle with only three wheels as an ATV, and it will not manufacture, sell or market such ATVs.

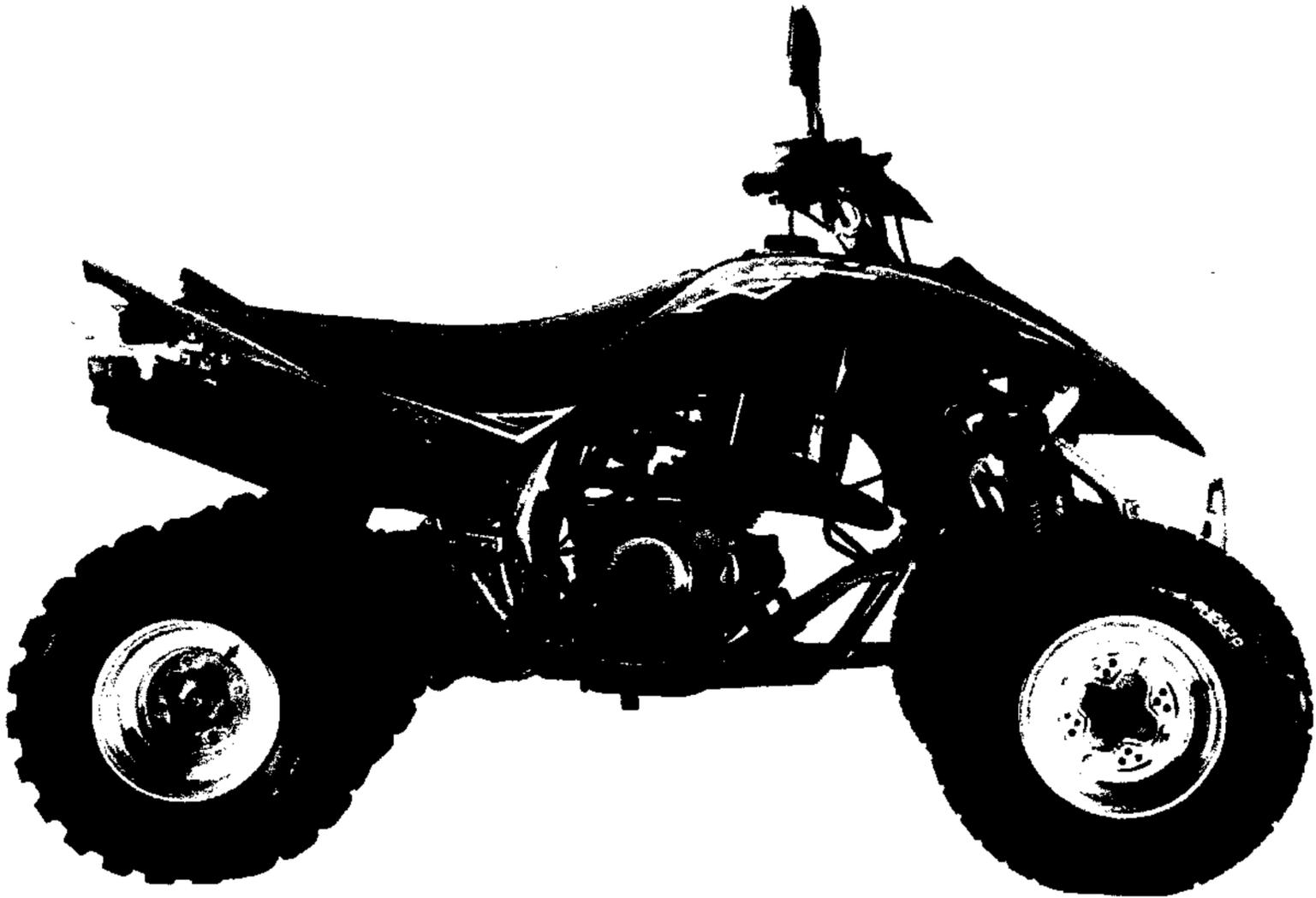
### **Notice of Termination of or Material Changes to Action Plan:**

Jianshe intends to maintain the above specified actions indefinitely. Jianshe will provide information about these activities upon receipt of reasonable requests from the CPSC. Jianshe will notify the CPSC at least sixty (60) days prior to terminating or materially changing any of these activities.

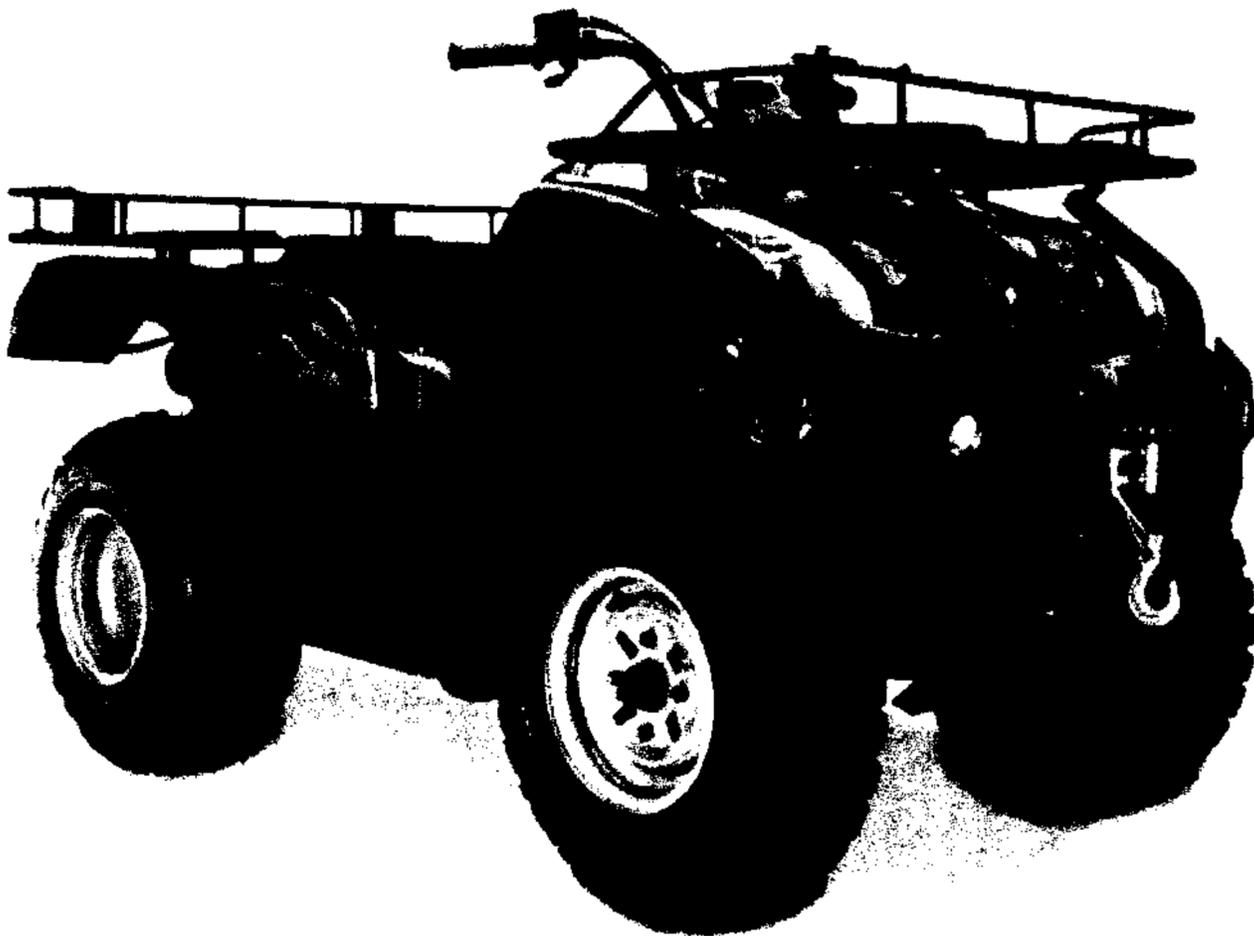
Sincerely,

He Changxing, Dated: Aug 11, 2009  
Changxing (Tony) He, General Manager  
Jianshe USA Inc.  
20957 Currier Rd, unit E  
Walnut, CA 91789

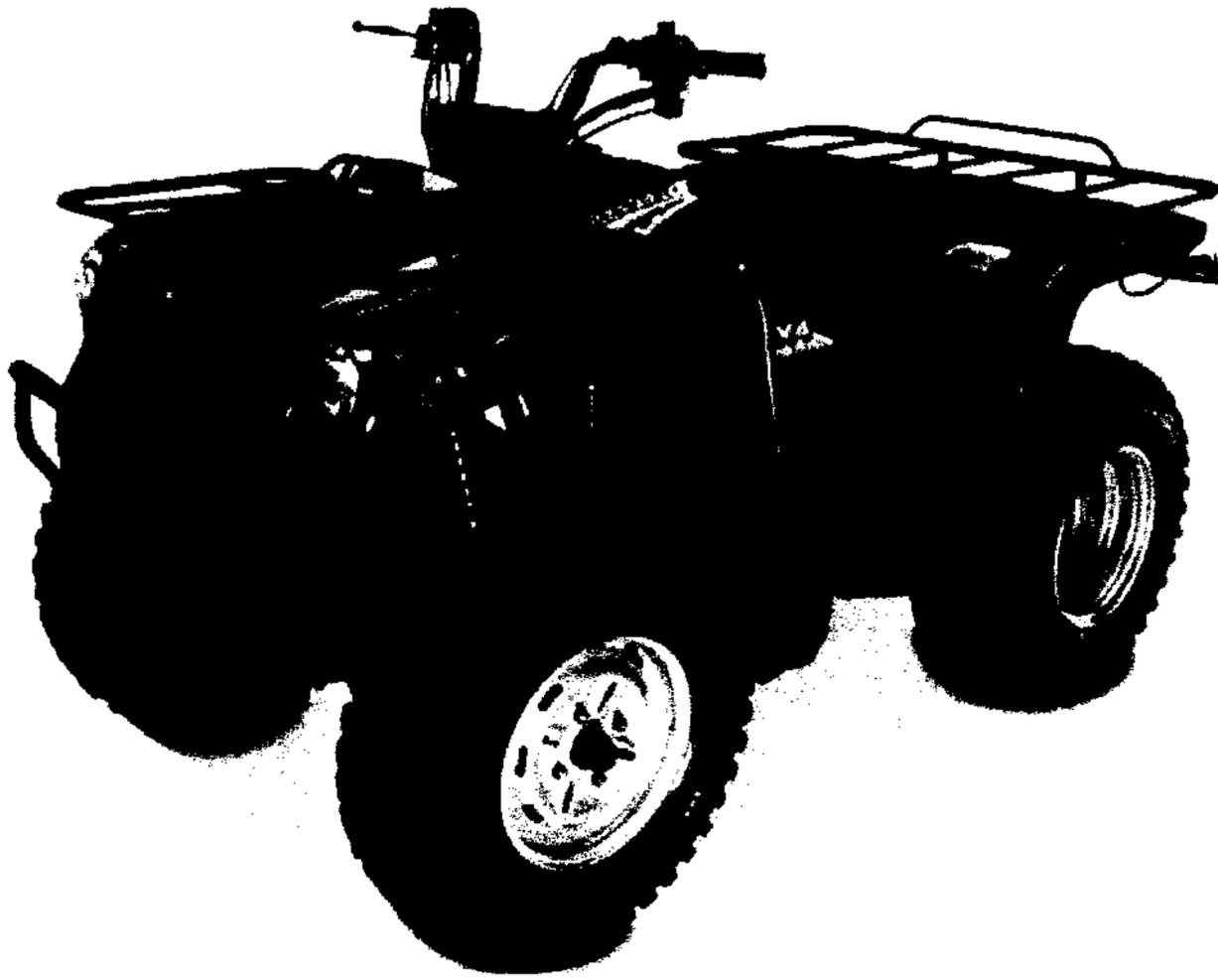
Cc: Paul Douglas Kerns, CEO, Tianbing Sun, Director of Engineering  
Motolabs Corp., EPA/ DOT/ ATV Consultants and Onsite Manufacturing Vehicle Testing



**JS250ATV-8**



**JS250ATV-5**



**JS400ATV**