



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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June 14, 2007

Mr. James McNew
Vice President of Technical & Marketing Services
Outdoor Power Equipment Institute
341 South Patrick Street
Alexandria, Virginia 22314

Dear Mr. McNew:

Thank you for your response to the U.S. Consumer Product Safety Commission (CPSC) staff's comments regarding the August 15, 2006, draft of ANSI B71.10 *Small Off-Road Ground Supported Outdoor Power Equipment Gasoline Fuel Systems Performance Specifications and Test Procedure*. As part of the Canvass review process, CPSC staff has reviewed the revised ANSI B71.10 draft standard and has the following comments*.

In a November 8, 2006, letter to you, the CPSC staff recommended that the draft standard include fuel tank performance requirements that simulate environmental conditions expected during operation, such as UV exposure, cyclic temperature, cyclic pressure, impact, and vibration tests. The Technical Committee response stated that there have not been failures directly linked to these issues; thus, these tests are not included in the draft standard at this time. The Technical Committee determined that stress crack failures in plastic fuel tank systems were due to a change in plastic material; hence, the standard was created to prevent this issue.

As presented in the draft standard, a limited number of fuel tank samples would be pulled from production lines for evaluation at elevated temperature and cyclic pressure. All fuel tanks would be visually examined to check for air leaks. This practice seems to be geared toward manufacturing checks of the daily molding processes rather than performance tests intended to ensure long-term fuel tank integrity during consumer use.

* These comments are those of CPSC staff and have not been reviewed or approved by, and may not necessarily represent the views of, the Commission.

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CPSC staff continues to recommend that a plastic fuel tank performance standard should include tests representative of operational conditions, such as those outlined in our November 8, 2006, letter.

We are encouraged that the ANSI B71.10 Committee has informed the committee for handheld power equipment, ANSI B175, of the CPSC staff's concerns. We look forward to participating in the development of a handheld fuel tank performance voluntary standard.

Thank you for this opportunity to provide comments on this draft standard. Please do not hesitate to contact me with questions about these comments.

Sincerely,

Susan Bathalon

cc: ANSI B71.10 Technical Committee
Colin Church, CPSC Voluntary Standards Coordinator