

full weight. This may contribute to tip over of the product.

The likelihood of children gripping the molding and pulling on the cart is the critical issue. The probability of this occurring is partly a function of the environment in which the product is located and the child's age. If the room contains many competing stimuli such as other furnishings and toys, and the child has limited mobility, the probability of a child using the product for support to stand and subsequently gripping the molding is low. However, the right environment and age may contribute to a high probability that a child would grip the molding. Rooms containing few toys or furnishings may enhance the attractiveness of the TV cart. Children between the ages of 7 and 12 months are increasingly mobile and experiment with objects. They like to push buttons, turn dials, and perform other actions to produce an effect. A TV or VCR placed on the product increases the probability that a child would be attracted to and, therefore, pull up on the cart. The probability of a child gripping and pulling on the molding in this scenario is high.

- 2) Comment on any alternatively designed molding that may lessen the likelihood of children gripping and pulling the molding.

If the depth of the shelf molding were reduced so that the molding could not be easily gripped by the fingertips of a young child, the likelihood of gripping the molding and pulling the cart, causing it to tipover, is reduced. This, however, does not preclude a child from using a cart for support to stand. Children may place their palms down against the surface of the molding to pull themselves up, possibly leading to tip over. Thus, an alternatively shaped molding may reduce the overall probability of a child gripping the molding and pulling the cart over, but it may not have a significant impact.

DRAFT- FOR OFFICIAL USE ONLY- DRAFT

- 3) What is the likelihood that consumers would remove the casters? This was included as part of the request and was discussed with the Compliance Officer (11/20/98).

Cost to the user, in terms of time, effort, money, and convenience is probably the most important variable that will influence whether consumers will remove the casters. The mobility of the product is a feature that likely influences its purchase. The proposed plan, however, requests that consumers reduce the utility of the product which retails for \$50 to \$60. Doing so would require considerable time and effort, not to mention the physical discomfort from handling a heavy load, and will leave the consumer with a less desirable product. Given that the proposed plan would entail costs to the user and loss in the utility of the product, it appears unlikely that consumers will remove the casters and the product will continue to pose a tip over hazard. The product's safety label is misleading as it depicts the TV cart on casters and, therefore, may discourage users from taking off the casters. The label states, "CAUTION - Use caution when moving cart. Unit may tip, and includes graphics depicting the product on casters. If the label is to be included as part of the retrofit, it should be revised to motivate users to remove the casters, particularly second hand users who would have no knowledge about the product's tip over hazard other than from a label on the product.

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For those who do modify the product, there are potential for injuries. Many TVs either do not have handles or handholds. Handling heavy loads without these may result in undue stress to the user as well as greater potential for dropped objects. If the TV is dropped, injury and/or property damage may occur.

Conclusion

The conclusions are as follows:

- The likelihood of a young child gripping the molding and potentially pulling the cart, causing the cart to tip over depends on the characteristics of the child and features of the environment. Given the worst case scenario as described, the probability is high that the child will grip the molding and pull on the cart, causing tip over.
- The molding is unlikely to be easily gripped by a young child if its depth is reduced. This may incrementally reduce the likelihood gripping the molding and pulling on the cart, causing the cart to tip over but, does not preclude a child from using a cart for support to stand. Children may place their palms down against the surface of the molding to pull themselves up. Thus, an alternatively shaped molding may reduce the overall probability of a child pulling the cart over, but may not have a significant impact.
- It is unlikely that users will remove the casters. For those that do, there are potential for injuries.

References

Kroemer, K. and Grandjean, E. (1997). *Fitting the Task to the Human*. Taylor & Francis: London

Snyder, R.G.; Spencer, M.L.; Owings, C.L.; & Schneider, L.W. (1975). *The Physical Characteristics of Children as Related to Death and Injury for Consumer Product Design and Use* (Report N. UM-HSRI-BI-75-5). Prepared for the U.S. Consumer Product Safety Commission, Washington, D.C.

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PRODUCT SAFETY ASSESSMENT (PSA) TECHNICAL EVALUATION REQUEST

Requested by: Judith Hayes, Ext: 1355 Org. Code: CCA Field Off: FOER
Date Submitted: 10/20/98 Priority: B Case #: CA980039

PRODUCT INFORMATION

Manufacturer: Sauder Woodworks City: Archbold State: OH
Product: Television cart NEISS Code: 1650
Brand name, model, etc. model 5155 retrofit molding

Sample number: _____
Sample Disposition Return to Requestor Store at Whse Other: _____
IDI Number: _____

EVALUATION REQUESTED: HF - Sharon White - Assess the likelihood that children will grip the retrofit molding and pull the cart, causing the cart to tip over. Also, comment on any alternatively designed molding that may lessen the likelihood of children gripping and pulling the molding.

EPI ASSESSMENT: Dates: From: _____ To: _____ Sort by Mfg. Yes _____ No _____
IDI IPII NEISS Comments NEISS Estimates Deaths NFIRS
Hazard: cart may tip over Hazard Code: _____

Requested Completion Date: verbal response initially, and written response due date to be negotiated with S. White
Locations of: Samples: Sample at ES lab/ Frank Vittiliti Files: with C.O.

PSA ACTION (FOR PSA USE ONLY)
Request number: _____
Date Processed: _____
Date Requested: _____
Due Date: _____

Assigned to: _____
Organization: _____
Technical Off. _____
Request Summary: _____
Casper

Comments: _____
(Rev 8/97jb/ee)

210
a/c Sharon to do preliminary work of retrofit on 05/15/01
a/c of 10/20/98 #2 molding

Author: Frank A. Vitaliti at CPSC-LSEL
Date: 10/16/98 6:43 PM
Priority: Normal
Receipt Requested
TO: Judith P. Hayes at CPSC-HQ2
CC: Han Lim
Subject: TV cart status

Judy

I retested the 5155 with the wider molding and it passes the swivel test. Also retested prototype II and now it is stable up to 1/8" from the front edge. I had written you a much more detailed description of what I did, but lost it in an instant when I pressed the wrong key in cc mail.. I can fill you in on more details on Tuesday when I return. Please see attachment with current test results and status.

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PRODUCT SAFETY ASSESSMENT (PSA) TECHNICAL EVALUATION REQUEST

Requested by: Judith Hayes, Ext: 1355 Org. Code: CCA Field Off: FOCR
Date Submitted: 10/07/98 Priority: B Case #: CA980039

PRODUCT INFORMATION

Manufacturer: Sauder Woodworking City: Archbold State: OH

Product: TV cart retrofit kit NEISS Code: 0519

Brand name, model, etc. model 5155 retrofit kit

Sample number: to be assigned

Sample Disposition Return to Requestor Store at Whse Other:

IDI Number:

EVALUATION REQUESTED: ES - attn. Frank Vitliti: Apply retrofit kit to original model 5155 TV cart and test in accordance to UL 1678 tip stability test procedures. Comment on accuracy of assembly instructions to be provided to consumers with the retrofit kit. Also, test retrofitted unit with the anti-skid pad and without the anti-skid pad in accordance to UL 1678 tip test.

test w/ fact guide and report centers

EPI ASSESSMENT: Dates: From: _____ To: _____ Sort by Mfg. Yes _____ No _____
IDI IPI NEISS Comments NEISS Estimates Deaths NFIRS
Hazard: TV cart tip over. Hazard Code: 32301

Requested Completion Date: 10/13/98 with verbal response, written response date to be negotiated.

Locations of: Samples: Frank V. to pick up sample from C.O. on 10/9/98 Files: with C.O.

PSA ACTION (FOR PSA USE ONLY)
Request number: _____
Date Processed: _____
Date Requested: _____
Due Date: _____

Assigned to: _____
Organization: _____
Technical Off. _____
Request Summary: _____

copy

Comments: *PSA 4*

(Rev 8/97jb/ee)

*PSA # 0021.99 elementary
pay the last amount
of the \$2m*

FOR OFFICIAL USE ONLY

PRODUCT SAFETY ASSESSMENT (PSA) TECHNICAL EVALUATION REQUEST

Requested by: Judith Hayes, Ext: 1355 Org. Code: CCA Field Off: FOCR
Date Submitted: 10/07/98 Priority: B Case #: CA980039

PRODUCT INFORMATION

Manufacturer: Sauder Woodworking City: Archbold State: OH

Product: ~~clear plastic shield for use with TV~~ NEISS Code: 0519

Brand name, model, etc. prototype # BS55, product # 4155 (prototype design to replace model 5155)

Sample number: unit to be sent directly to ES lab from firm, no sample number on file to date.

Sample Disposition Return to Requestor Store at Whse Other:

IDI Number:

EVALUATION REQUESTED: ES - attn. Frank Vitiliti: Test prototype sample according to UL standard 1678's stability tip test. Please respond verbally to C.O. initially with written response to follow.

EPI ASSESSMENT: Dates: From: _____ To: _____ Sort by Mfg. Yes _____ No _____
IDI IPII NEISS Comments NEISS Estimates Deaths NFIRS
Hazard: TV cart tip over. Hazard Code: 32301

Requested Completion Date: 10/13/98 with verbal response, written response date to be negotiated.

Locations of: Samples: being sent directly from firm to ES lab, to be received Files: with C.O. by ES by 10/09/98.

PSA ACTION (FOR PSA USE ONLY)
Request number:
Date Processed:
Date Requested:
Due Date:

Assigned to:
Organization:
Technical Off.
Request Summary:

Casper

Comments:

Part B

(Rev 8/97jb/ee)

2/3

Author: Frank A. Vitaliti at CPSC-LSEL
Date: 9/18/98 6:06 PM
Priority: Normal
Receipt Requested
TO: Judith P. Hayes at CPSC-HQ2
CC: Lori E. Saltzman at CPSC-HQ2, Han Lim
Subject: Sauder TV cart test results

Judy

The Sauder TV cart Model 5155 was tested per UL 1678 tip stability procedure. The test results are:

1. with 4 casters and with the use of the anti-skid pad*, this TV cart did tip over and did not comply with UL Std.
2. without casters and with the use of anti-skid pad*, this TV cart did tip over and did not comply with UL Std.
3. without casters and without the use of the anti-skid pad, this TV cart did tip over and did not comply with UL Std.

* A note in the TV cart instruction manual indicates that the anti-skid pad should be placed "under the front center support of the TV". First of all, the tip stability test is not conducted with a real TV. The TV is simulated by a test fixture which was fabricated at the engineering laboratory (by Mark Eilbert) to simulate the TV load, using UL Std. Fig. 13.1. Secondly, the lab's test fixture does not have a "front center support", however it has two side supports. One anti-skid pad was placed underneath "each front portion of the side supports" of the test fixture, which essentially doubled the anti-sliding force of the test fixture. This should not affect the initial tip over ability of the TV cart, nor the test results since when no pad was used, and the cart began to tip, the test fixture did not slide. Therefore using or not using the anti-skid pad does not (in my opinion) affect the initial ability of the cart to tip over. However it can make a significant difference in the home environment with a real TV. If the "home TV" does not have a center support, the instructions should indicate that the anti-skid pad can also be installed underneath any "side supports" as well.

Please call me at home Monday (301-330-8810) and let me know what room # we are to meet for Tuesday's meeting with manufacturer.

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PRODUCT SAFETY ASSESSMENT (PSA) TECHNICAL EVALUATION REQUEST

Requested by: Judith Hayes, (301)504-0608 Ext:1355 Org. Code: CCA Field Off: FOCR
Date Submitted: 9/15/98 Priority: B Case #: CA980039

PRODUCT INFORMATION

Manufacturer: Sauder Woodworking City: Archbold State: OH

Product: Television Stand NEISS Code: 0519

Brand name, model, etc. model 5155

Sample number: 97-491-0731, being transferred from the warehouse to ES lab as of 9/15/98

Sample Disposition: Return to Requestor Store at Whse Other:

IDI Number:

EVALUATION REQUESTED: ES - Frank Vitaliti - Perform UL 1678 tip st conditions: (1) with the 4 casters and the use of the anti-skid pad, (2) without (3) without the 4 casters and without the anti-skid pad. Please provide a verbal

cart under the following of the anti-skid pad, and response.

Handwritten signature: Frank Vitaliti

EPI ASSESSMENT: Dates: From: To: So

IDI IPII NEISS Comments NEISS Estima

Hazard: TV may fall from cart injuring person in immediate area of cart

Requested Completion Date: 9/21/98 for verbal response, written response dat

Locations of: Samples: sent from warehouse to ES lab as of 9/15/98 Files:

PSA ACTION (FOR PSA USE ONLY)
Request number:
Date Processed:
Date Requested:
Due Date:

Assigned to:
Organization: EP
Technical Off.:

Request Summary:

Handwritten: Copy

Comments:

(Rev 8/97jb/ee)

Handwritten: 25

SM



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

RECALLS AND COMPLIANCE DIVISION

TEL: 301-504-0608

FAX: 301-504-0359

DATE: 9/15/98 PAGES TRANSMITTED 1 + cover

TO: Frank Vitaliti

TITLE: _____

OFFICE: ES Lab

FAX #: 301 413-7107

FROM: Judy Hayes

REMARKS: PSA for Sauder model 5155

Confirmation copy to follow by U.S. Mail

Fax Transmission Only

NOTE: If all pages are not received, or if you have problems with this transmittal, please contact the person listed above.

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PRODUCT SAFETY ASSESSMENT (PSA) TECHNICAL EVALUATION REQUEST

Requested by: Judith Hayes, (301)504-0608 Ext:1355 Org. Code: CCA Field Off: FOCR
Date Submitted: 9/15/98 Priority: B Case #: CA980039

PRODUCT INFORMATION

Manufacturer: Sauder Woodworking City: Archbold State: OH

Product: Television Stand NEISS Code: 0519

Brand name, model, etc. model 5155

Sample number:

Sample Disposition Return to Requestor Store at Whse Other:

IDI Number:

EVALUATION REQUESTED: HF - Sharon White - review file for closed meeting with firm scheduled for 9/22/98

EPI ASSESSMENT: Dates: From: _____ To: _____ Sort by Mfg. Yes _____ No _____

IDI IPII NEISS Comments NEISS Estimates Deaths NFIRS

Hazard: TV may fall from cart injuring person in immediate area of cart Hazard Code: 32301

Requested Completion Date: 9/21/98

Locations of: Samples: _____ Files: given to Sharon White

PSA ACTION (FOR PSA USE ONLY)

Request number: _____

Date Processed: _____

Date Requested: _____

Due Date: _____

Assigned to: _____

Organization: EP

Technical Off. _____

Request Summary:

copy

Comments:

(Rev 8/97jb/ee)

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Tracy
test analysis
assessment
7/2/98

TV Card Entertainment Center Update

Sauder - Information in the file stated that Sauder did not implement the UL test until 12/96 so models manufactured prior may be expected to meet some type of "internal QC" provided one exists - I have not found any indications of "internal company requirements" in the file at this point.

5155 - Regarding the Sauder testing of models 5155 & 4115;

- Not sure why model was tested w/ doors closed, at minimum, I would think open (probably the worst case scenario for instability) would be tested and at that both open and closed scenarios would be tested.

- I do not understand the meaning of the various Tip-over Angle designations and results - "Simulated" "Recommended" and "Unloaded" - and the various angles reported.

- There is mention of the "Anti-Skid pad to be included with the unit, but not the wall bracket hardware. Was the Anti-skid pad included/needed for the unit to pass the test? If so, I think that's a problem - puts the onus on the consumer to install/use to make the unit safe/pass the test. Never a good idea to rely on consumer.

4115 - Preliminary results indicated that tipover occurred at 9.8°. I agree with the compliance assessment that several models should be tested to identify any anomalies. My additional concern would be - Why is the unit performing at the bare minimum of the standard to begin with? I would hope, from a design aspect, these products would be made/designed for stability at some angle above the minimum standard requirement.

Bush - Information provided in the file indicates that the firm has had internal requirements in existence prior to the UL 1678 (1991). Earliest provided procedure is dated Sept '87. The standard is similar to UL requirements with a minimum angle of 10°. However, none of the procedure pages of the test procedure were provided, only the stability test & criteria (or interest I guess).

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Regarding model 7414 testing:

- Engineering lab found the unit to fail.
- Bush tests say the unit passed, 13° but also noted "The lower door touched the floor at 8° preventing the unit from tipping. The door was "closed" to finish the test"... but there is no mention of whether the test was restarted or the door swung open as it began to tip. The TV doors were open - are these the same doors? Had the lower door remained closed at 8°, would the unit have tipped over? My feeling is that the unit failed, but the opening of the door prevent the tipover from occurring - how the test was completed and the unit "passed" I can not explain, if it started tipping at 8°, what stopped it during that restarted test when the door was closed?

Thornwood - Unit appear to be tested to "higher" requirements than outlined by the UL standard - 10°, 20°, & 21°. The incident reported involved a television which fell from the cart when the unit may have become unstable - the unit however, did not tip over, the TV fell from the cart. The carts come with casters, which did not appear to be - but are supposed to be - removed. Do not believe this was recommend for testing because of the nature of the incident. Thornwood, however, tests these units w/o casters because they're recommended for removal - Again, I would not want to assume the consumer would remove the casters and rely on that action for "Passing" the standard.

New Direction - The unit involved in the incident had casters which, again, were supposed to be removed. There are several test results provided which show varying weights used to fill various drawers and cavities of the unit - I see not explanation for the varying weights for the same product intended cavity - i.e. VCRs, stereo cavity, etc.

UNITED STATES GOVERNMENT
PRODUCT

COMMISSION
MEMORANDUM
20814

U.S. CONSUMER

SAFETY

BETHESDA, MD

Date: January 29, 1998

To: Sue Kyle, Division of Hazard Analysis (EHHA)

Through: Andrew Ulsamer, Associate Executive Director,
Directorate for Laboratory Sciences (LS)

From: Mark Eilbert, Division of Engineering (LSE)

Subject: Technical Assessment of Testing to the UL 1678 Tip
Test

Introduction

The stability of TV carts and stands was previously evaluated for compliance with the tip test in UL 1678¹². Sample TV carts and stands were selected for testing from a survey of manufacturers. The following is a technical assessment of the suitability of UL 1678 for preventing TV cart tip-overs.

UL 1678 is a comprehensive standard with several types of tests covering physical properties of TV carts and stands, including tip stability. The tip test in UL 1678 is a static test performed with the TV cart or stand loaded and resting on a 10-degree incline. Test loads comprise dead weight and are applied to supporting surfaces. These loads are either distributed, for general-use surfaces, or are more concentrated as in the simulated-TV load. In either case, the amount of loading is set, as a minimum, to that specified by the manufacturer or, when not specified, to a maximum based on usable space. These "anticipated loads" are bundled magazines for distributed loads or a simulated-TV load when use of a TV is specifically allowed by the manufacturer. Both types of loads can be placed in any combination that effects the most unstable condition, according to UL 1678. Inspection of the UL tip test requirements suggests that the simulated-TV load represents the largest and most unstable test load. As will be discussed, the tip test in UL 1678 is technically well developed and would

¹ Report on TV Cart and Stand Stability Tests, December 8, 1997.

² UL 1678, Household, Commercial, and Professional-Use Carts and Stands

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improve the overall stability of the currently marketed TV carts
and stands through compliance to that standard.

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Tip Test Evaluation

In the UL tip test, the typical height and load of a simulated-TV, the geometry of its placement on a TV cart or stand, and the static tip angle of the test make the test most sensitive to TV sizes. Simulated TV's in UL 1678 vary in weight from 25 lb for simulated 13-inch TV's to 240 lb for 40-inch TV's. Typical weights for the CPSC tests were 70 lb to 95 lb and were selected according to manufacturers' recommendations. The application of other test loads, distributed and generally lower, have less impact on the tip tests.

The inclined test is a common static method to assess stability. In the UL test, the 10-degree incline of the TV cart/stand, a forward lean, moves the weight of the cart/stand and the applied test loads toward the front supports. An incline can move loads, especially high loads, in front of and past the front supports, creating an unstable load overhang. Televisions, commonly heavier than the empty cart/stand, are (usually) placed at the highest supporting surface. The simulated-TV load then becomes the prominent load with the greatest affect on the outcome of the stability test. Essentially, the 10-degree incline test discriminates between TV carts and stands that would otherwise all seem suitably stable in the normal, undisturbed, level condition. Due to the uncontrolled environment of their use, the amount of disturbance (push or pull) that can be safely applied to a TV cart or stand in normal use cannot be judged reliably. The 10-degree incline adds a measure of instability in the test as compensation for these unknowns. The UL 1678 tip stability test uses realistic loads (simulated-TV) and is technically well developed (inclined test).

TV Cart and Stand Samples

The TV cart/stand samples were selected for testing to UL 1678 based on a survey of 19 models from ten manufacturers. Of these, five models were selected from four manufacturers. Samples were selected based on their prospective instability estimated from the samples' dimensions. The depth from front to rear and the height were the key determinants. These dimensions figure into the geometric stability of a TV cart/stand and are stated as a ratio of height-to-depth: H/D. In principle, the higher H/D TV cart/stands should be less stable. Laboratory tests¹ confirmed this and showed that the least stable samples had the highest H/D. The four (of five) samples that failed the UL 1678 test had H/D ratios that were typical of the mid to high end of the range of ratios of the survey group. The one sample that passed had the lowest H/D of the survey and was UL listed.

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[That sample TV stand, although passing the UL 1678 test, had features that placed it within the scope of UL 1410³, which has a similar tip test. Features included mounting hardware to secure specific TV-models]. The H/D ratio is a strong indicator for stability.

Effectiveness of Testing to UL 1678

Compliance to UL 1678 would require changes in the design of some TV carts and stands. As discussed, changes to height and depth are important considerations. A change that lowers the placement of the TV or deepens the TV cart/stand will have the effect of increasing the likelihood that a given model will pass the UL 1678 tip stability test. Because the TV cart or stand is by function a top-loaded piece of furniture, lowering the height might also reduce the likelihood for serious injuries. The effectiveness of more compliance to UL 1678 to reduce actual tips, and presumably tip injuries, depends on the actual use of the carts/stands by consumers and their knowledge of the potential tip hazard. Based on tests conducted on a limited survey of TV carts and stands, increased compliance with the UL 1678 tip test will have the effect of increasing the tip stability of TV carts and stands.

³ UL 1410, Television Receivers and High-Voltage Video Products.

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DRAFT

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UNITED STATES GOVERNMENT

U.S. CONSUMER PRODUCT
SAFETY COMMISSION
BETHESDA, MD 20814

MEMORANDUM

Date: October 16, 1997

To: Sue Kyle, Division of Hazard Analysis, EHHA
Through: Robert T. Garrett, Acting Director,
Division of Engineering Laboratory, LSE
From: Mark Eilbert, Division of Engineering Laboratory, LSE
Subject: Report on TV Cart and Stand Stability Tests

Introduction:

LSE has completed tests on six carts/stands drawn from a market sampling coordinated by the Directorate for Economic Analysis. Tests were conducted according to the "Tip Stability Test" in UL 1678, Household, Commercial, and Professional-Use Carts and Stands, which covers carts and stands intended for use with audio and video products.

LSE collected two TV stands, one utility stand, and three TV carts. The carts had castor wheels. Purchases were made from local home centers and department stores. All of the units required assembly. Overall, the samples had an open top surface, at least one additional shelf, and the main structure was wood and wood composites. Additional features included cabinet doors, drawers, a swivel top, and a strap to secure a television. Sample identifications and descriptions are listed in Tables 1 and 2. Images 1 through 6 show the samples.

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Table 1
Sample Identifications

Make	Model	Sample #	Description	UL?
Bush	#7414	97-491-0729	TV stand, glass door	no
Sauder	#4551	97-491-0730	TV cart, open shelves	no
Sauder	#5155	97-491-0731	TV cart, swivel, shelves, doors	no
Sauder	#3304	97-491-0732	Utility stand, drawer, shelf, doors	no
S.W.P. ¹	#30192	97-491-0733	TV cart, shelf	no
Sony	SU-27A	97-491-0747	TV stand, glass door, TV strap	yes

¹ Southern Wood Products, Inc.

Table 2
Sample Descriptions

Sample #	Load Marking	Height in (mm)	Depth at Base in (mm)	Ratio: Height/Depth
97-491-0729	106 lb TV	29 (737)	15.5 (394)	1.87
97-491-0730	90 lb	25.5 (648)	15.5 (394)	1.65
97-491-0731	<95lb TV or 27" TV	25.3 (643)	15.5 (394)	1.63
97-491-0732	None	32.3 (820)	14.8 (376)	2.18
97-491-0733	None	25 (635)	16 (406)	1.56
97-491-0747	specific TV's	18 (457)	21 (533)	0.86

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DRAFT

Of the six samples, four fall within the scope of UL 1678. Sample 97-491-0747, Sony SU-27A, is not in scope because it is intended for use in combination with a "specific appliance" - that is, Sony TV models. LSE staff collected this sample in order to test a UL-listed TV cart/stand. Sample 97-491-0747 falls under the scope of the UL appliance standard, UL 1410, Television Receivers and High-voltage Video Products. The stability test in UL 1410 is similar to that in UL 1678 in that they both have the same 10 degree tilt angle. Testing this sample to UL 1678 using the simulated TV frame for 27-inch TV's will therefor produce meaningful results but not comparable data to that test in UL 1410 using a Sony-model TV. [e.g.: The Sony stand has a strap for Sony TV's]. The pretense is that the consumer could still use the Sony SU-27A to support non-Sony TV's, and so the sample is tested to UL 1678.

The utility stand, sample 97-491-0732, is not designated for use as a stand for audio or visual equipment. A microwave oven is displayed on the shipping box. LSE tested this sample to provide some background knowledge on the stability of other types of carts/stands.

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DRAFT**Test Procedure/ Test Results**

LSE staff performed tests following the tilted platform test in Part 15, "Tip Stability Test" in UL 1678, , Household, Commercial, and Professional-Use Carts and Stands, version dated December 18, 1996. That tilt test requires that a TV cart or stand, supporting a test load, shall not tipover when resting on a 10-degree inclined surface. The wheels of carts are blocked. Test loads are defined according the manufacturer's designated use of each cart/stand surface:

- a. Designated loads other than TV's
- b. Designated load based on TV size
- c. Maximum anticipated loads (Undesignated loads)

TV loads are simulated by position of weight within a test frame described in UL 1678. Other loads are composed of magazine bundles distributed over the supporting surface, such as shelves and drawers. Loads can be applied singly or in combination, whichever would affect the greatest instability.

LSE staff constructed a simulated TV frame according to UL 1678 requirements (Image 7). TV size affected the amount and position of weight added to the simulated TV frame. In general: the larger the TV, the heavier and higher the weight on the simulated TV. As a rule, LSE staff prepared simulated TV's according to the size designation of the manufacturer. Where a TV load was designated that fell between those specified in UL, two tests were performed at that load: the next smallest and the next largest simulated TV. If a television was depicted on the carton or owner's manual of a sample without further designation, LSE staff selected a simulated TV based on the size of comparably dimensioned sample TV carts/stands.

Test results in Table 3 indicate whether the sample cart/stand and test load tipped during the UL tilt test.

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Table 3
TV Cart/Stand Tilt Test Results
(UL 1678)

Sample #	UL?	Test ²	Test Load:lb,N	Result	Balance lb(N)
97-491-0729	no	1	Sym. 27"TV:106,472	Tip	15(67)
97-491-0730	no	2 3	Sym. 27"TV:90,400	Tip	30(133)
			Sym. 24"TV:90,400	Tip	25(111)
97-491-0731	no	4	Sym. 27"TV:95,423	Tip	50(222)
97-491-0732	no	5 6	Sym. 24"TV:70,312	Tip	25(111)
			Mag:70,312 (top) Mag:15,67 (drawer)	Pass	-5(22)
97-491-0733	no	7 8	Sym. 20"TV:50,223	Tip	20(89)
			Sym. 24"TV:70,312	Tip	25(111)
97-491-0747	yes	9	Sym. 27"TV ¹ :95,423	Pass	-15(67)

¹ A UL label on the Sony SU-27A sample specifies 27" diagonally-sized Sony-model televisions.

Discussion

The one sample that passed the UL 1678 test for TV's, although not actually in scope - as discussed, did have defining features: the sample stand was designed for specific TV's and the stand dimensions were "stocky".

For this analysis only, LSE defines stocky in terms of the TV cart/stand dimensions as the ratio of height/depth. In terms of the UL 1678 test, the physically higher the simulated TV load, the more forward the load becomes because of the 10 degree incline (true for any incline). Image 8 shows a sketch of the UL 1678 tilt test. The sketched TV cart approximates the lateral outline of sample 97-491-0747. If dimension "H", height, is increased, then the simulated TV (load) will also move up, but also out, to the left in the image, towards the "pivot point". The pivot point represents, in general, the front supports, e.g. legs. This increase in height will act to make the TV cart/stand less stabile. However, if the depth "D" is increased, then the addition to the depth, the weight of the added construction materials, acts to keep the TV cart/stand from tilting, increasing the stability. Therefor, to increase the stability in the design of a TV cart/stand, a lower and deeper piece of furniture

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FOR OFFICIAL USE ONLY

is more effective. Stated another way, the ratio of height to depth, H/D, should be smaller to achieve more tilt stability. Comparison of H/D ratios from Table 2 with test results of Table 3 demonstrates the correlation: The only TV cart/stand to pass UL 1678 with a simulated TV load was the sample with the lowest H/D ratio: sample 97-491-0747 (ratio: 0.86).

Other aspects of designing for stability include: increasing the weight of the TV cart stand, setting the TV back from the front supports (notice the setback "S" in Image 8), or a combination of design elements. While the ratio of H/D can not alone predict the performance of other TV cart/stands in the UL 1678 tilt test, dimensional parameters such as height, depth, and weight can be adjusted to effect a more stabile piece of furniture.

To give an indication for the weight that would be needed to just pass the UL 1610 tilt test, LSE applied a force to either restrain a tipping sample or to tip a stabile one. Those forces are listed in Table 3. The point of application of force is shown in Image 8. " F_r " is the force to restrain from tipping. " F_t " is the force to cause tipping of a stabile sample. Sample 97-491-0731 required the greatest retraining force, 50 lb (222 N). The lowest force was 15 lb (67 N).

While not intended for TV use and not in the scope of UL 1678, sample 97-491-0732 did have the highest height to depth ratio (2.18). When loaded with a "maximum expected load" comprising magazines, the sample passed the 10 degree tilt test. It did not, however, pass the tilt test for a TV sized for the sample's top area.

Conclusions

One sample passed the UL 1678 tilt test for TV carts/stands; five other samples did not. Two relevant characteristics of the sample that passed was that it was lower and deeper than the other samples.

were

List of Images

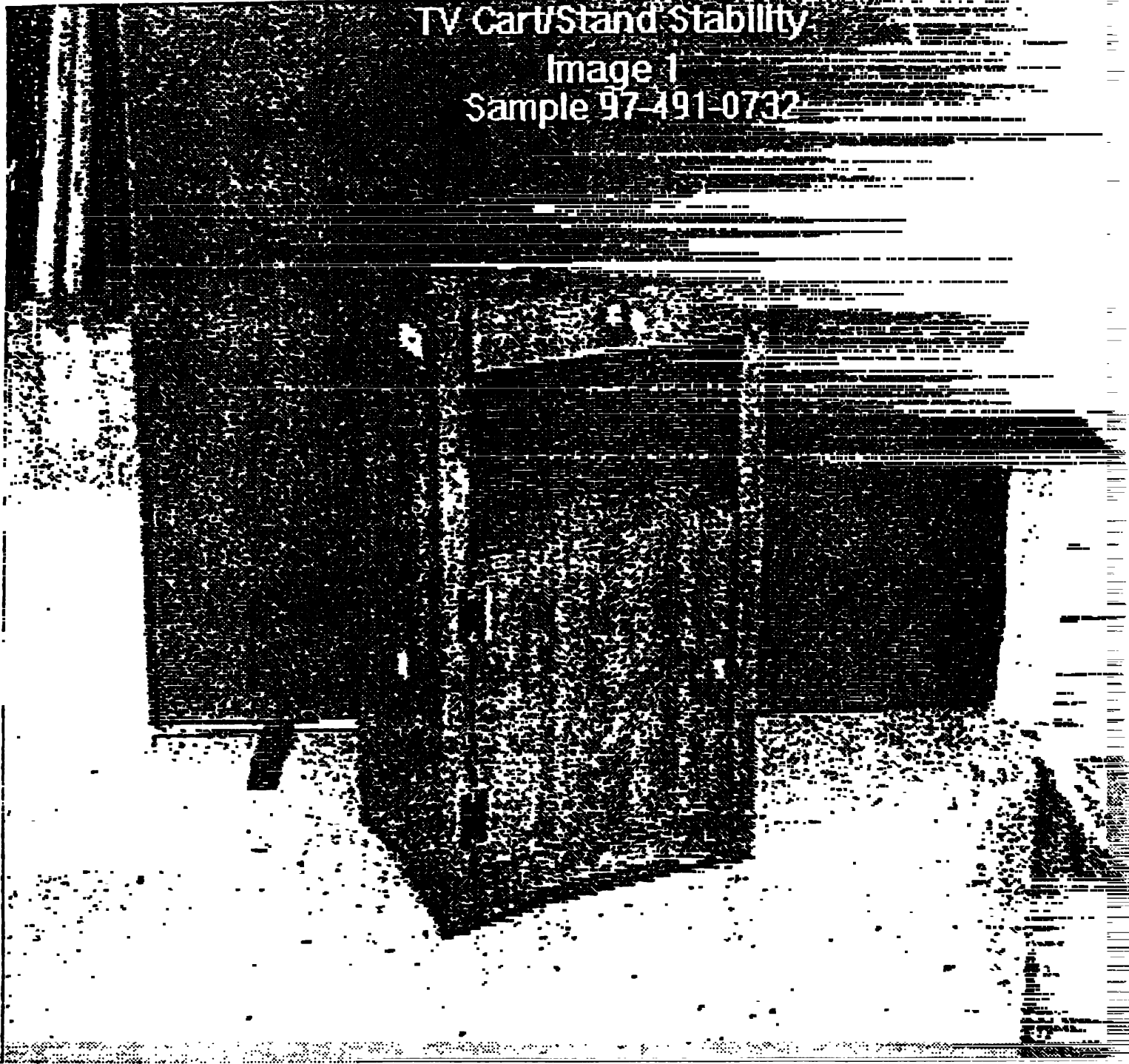
- Image 1 Sample 97-491-0732
- Image 2 Sample 97-491-0730
- Image 3 Sample 97-491-0731
- Image 4 Sample 97-491-0729
- Image 5 Sample 97-491-0733
- Image 6 Sample 97-491-0747
- Image 7 View of Stability Test
- Image 8 UL 1678 Test (Figure)

229

TV Cart/Stand Stability

Image 1

Sample 97-491-0732



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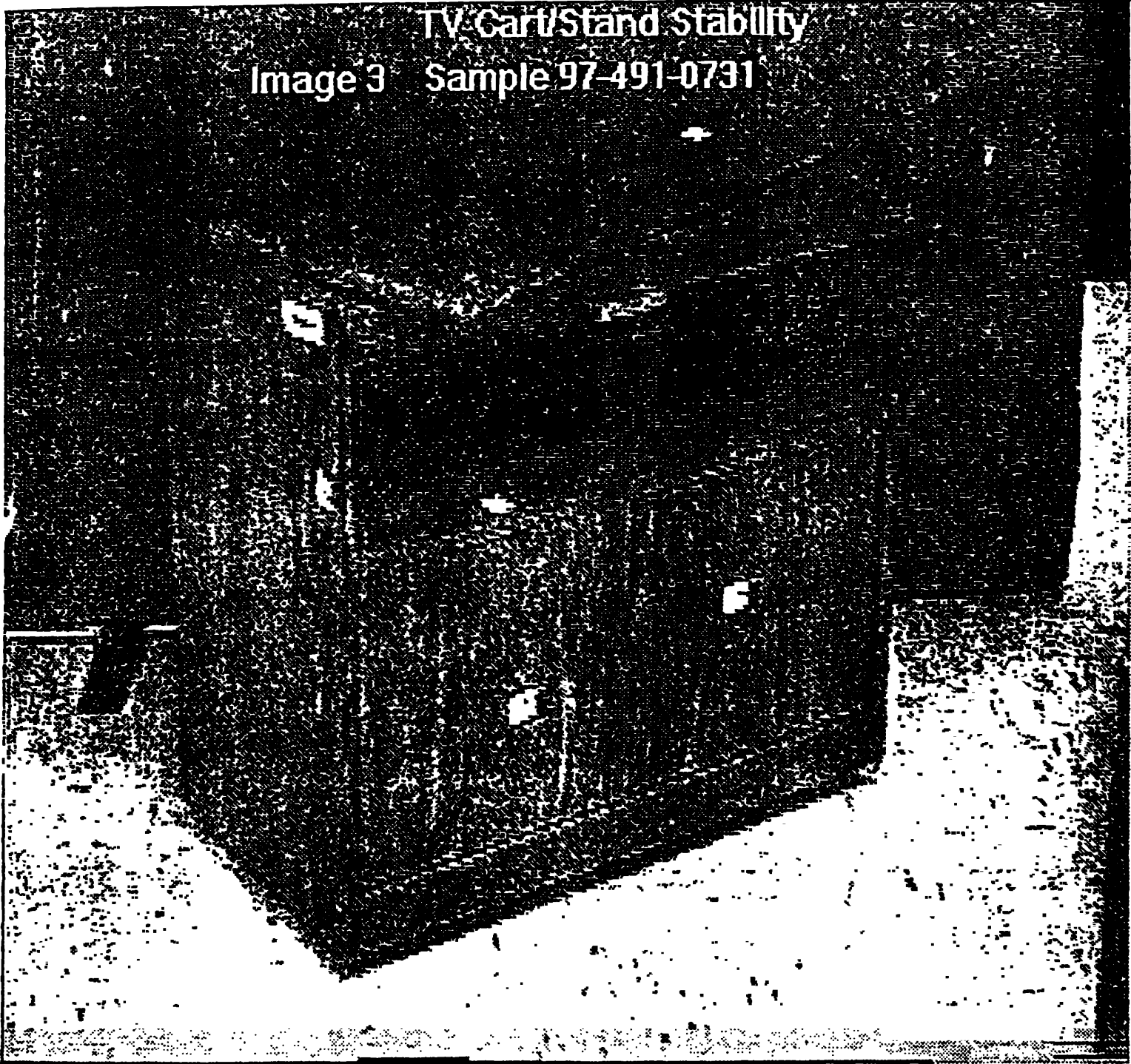
DRAFT

TV Cart Stand Stability
Image 2
Sample 97-491-0730



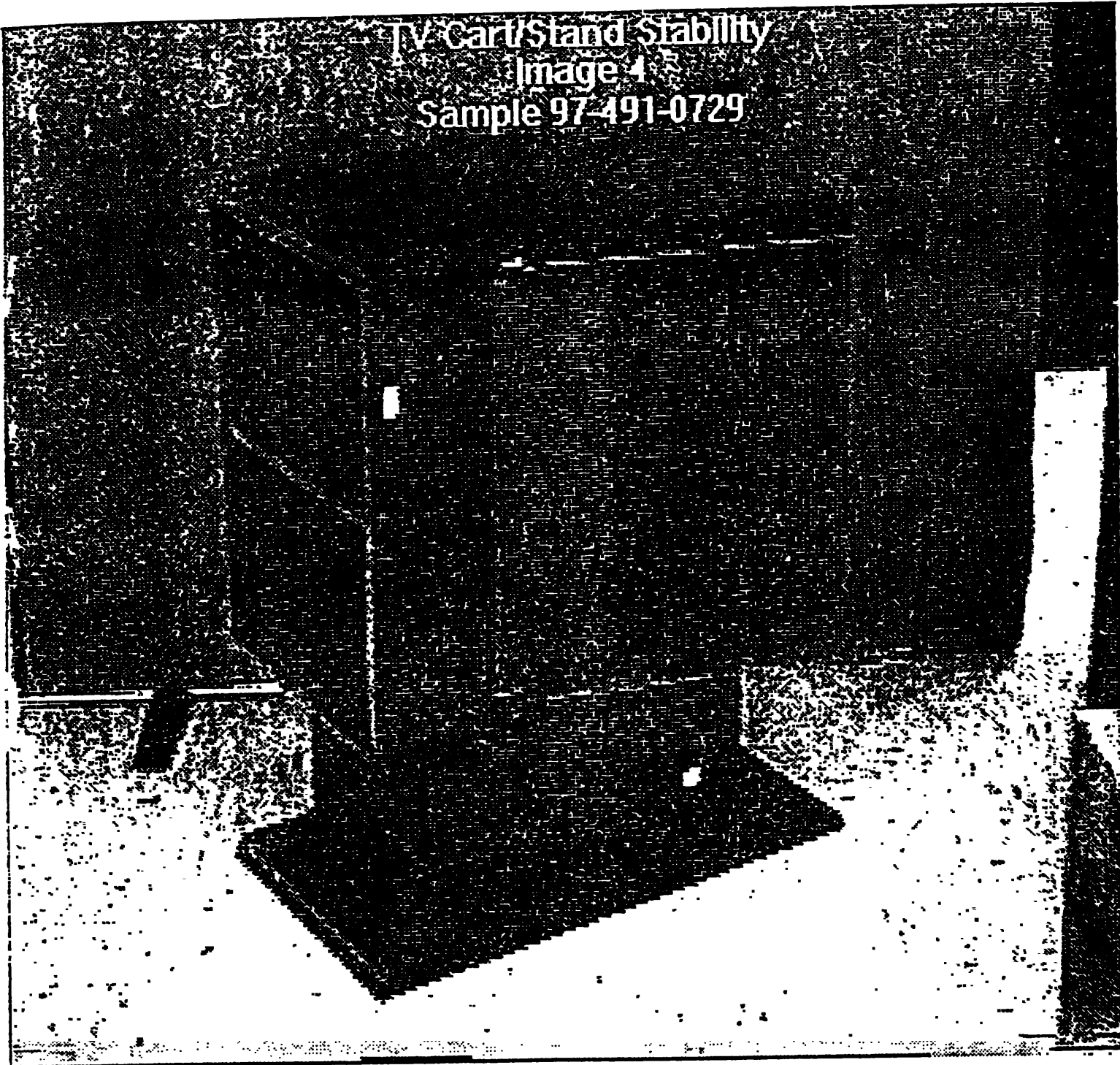
291

TV Cart/Stand Stability
Image 3 Sample 97-491-0731



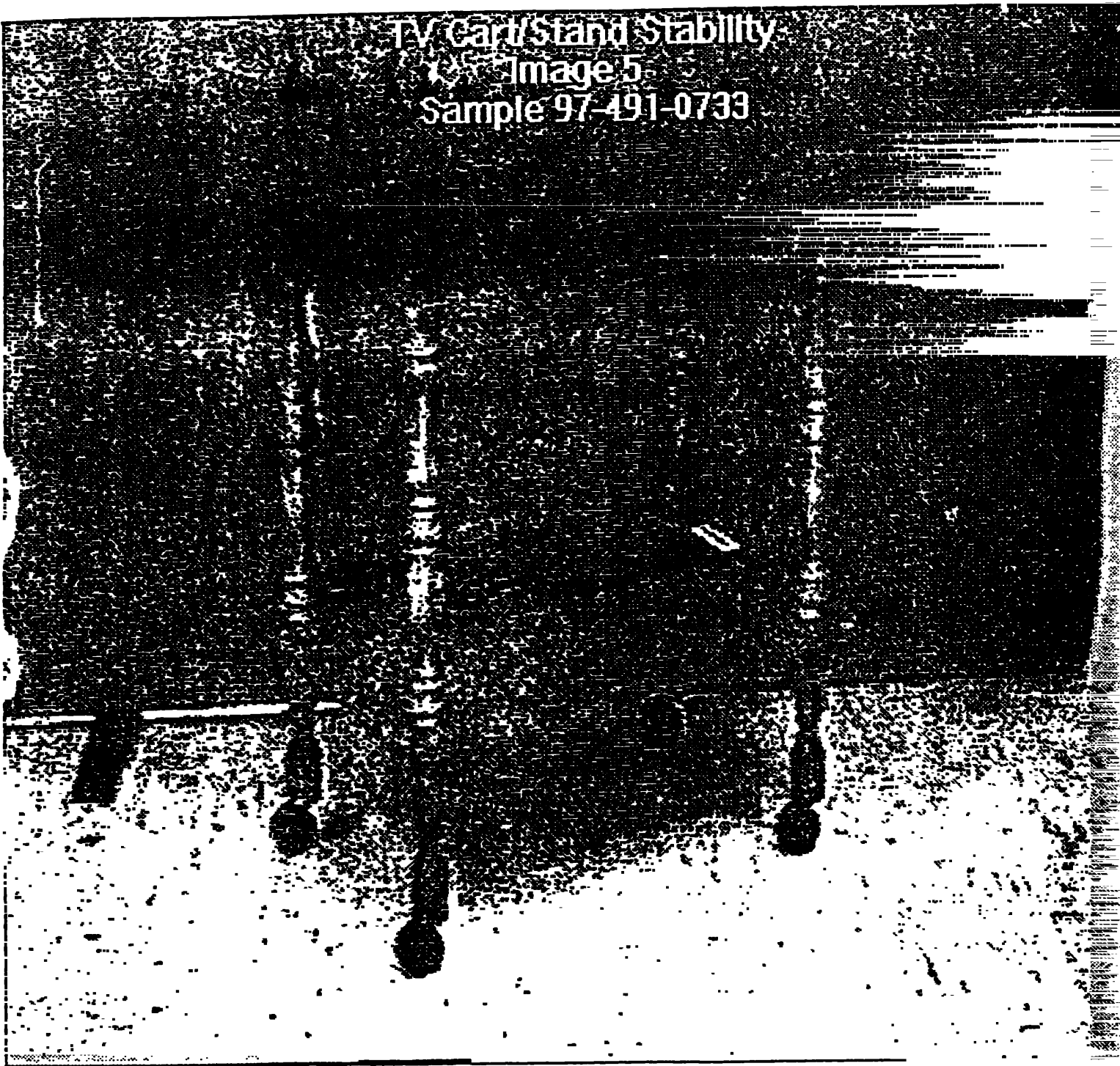
232

TV Cart/Stand Stability
Image 4
Sample 97-491-0729



233

TV Cart/Stand Stability
Image 5
Sample 97-491-0733



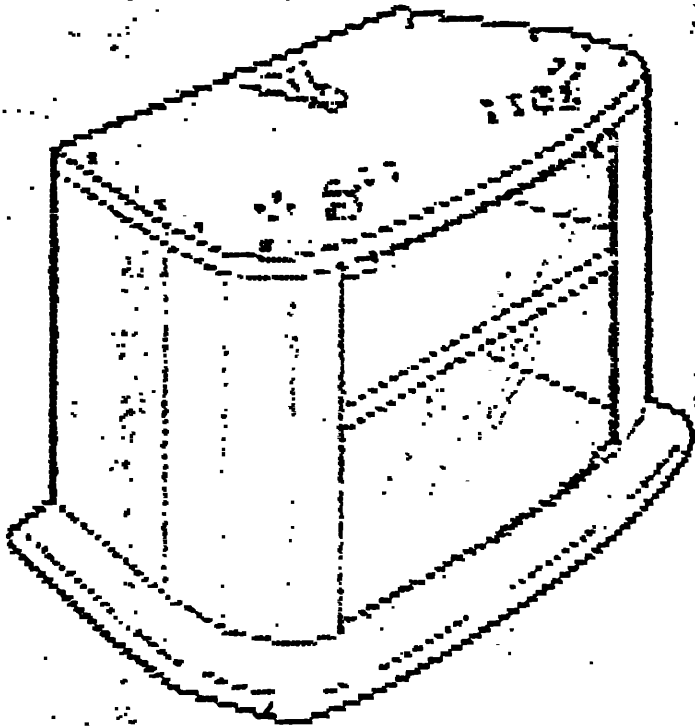
234

DRAFT

TV Cart/Stand Stability
Image 6

Sample 97-491-0747

3/ SOPORTE ENSAMBLADO



SONY

TV STAND
MODEL NO.
SU-27A



MADE IN MEXICO
SONY ELECTRONICS INC.

SONY APPLIANCE MODEL NO.

- | | | |
|-----------|-----------|----------|
| KV-27510, | KV-27515, | KV-27515 |
| KV-27515, | KV-27515 | |
| KV-27521, | KV-27521 | |
| KV-27525, | KV-27525 | |

96D

TAG

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TV Cart/Stand Stability
UL 1678 Stability Test
Image 7

← Simulated TV Load

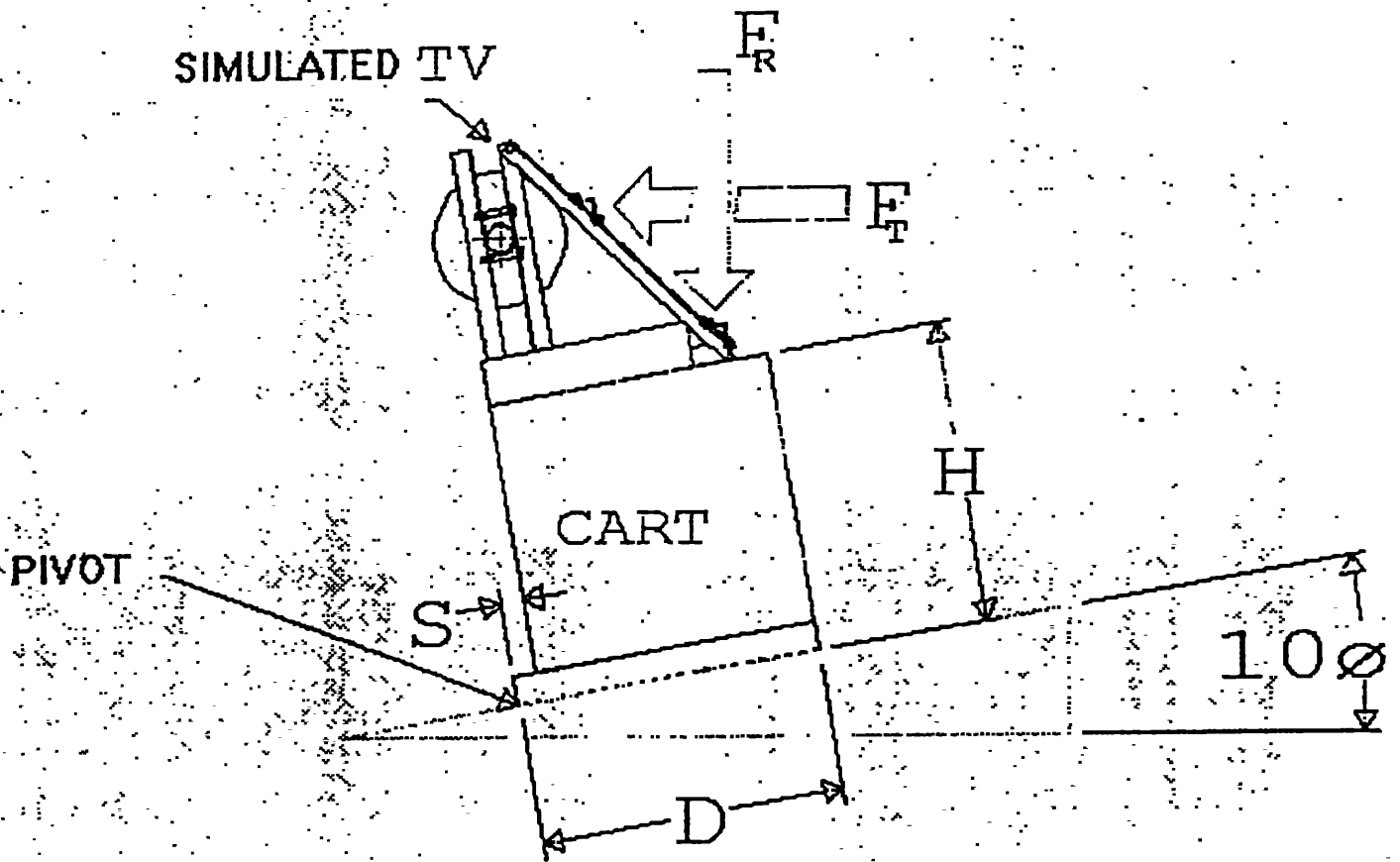
← Sample TV Cart/Stand
97-491-0733 shown

JUL 23 1997

3/4

TV Cart/Stand Stability

Image B
Terminology Used by
LSE in Tests of UL 1678



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13.5 When performing the Loading Test, Section 16, and the Wall or Ceiling Mounting Security Test, Section 17, the load used for each supporting surface shall be constructed so that the specified weight is uniformly distributed over the supporting surface. Wood not less than 1/2 inch (12.7 mm) thick, covering at least 75 percent of the useable surface of each supporting surface and placed between the supporting surface and the mechanical load (adjusted for the weight of the added wood), is considered to distribute the test load uniformly.

Table 13.1
Simulated television load parameters

Maximum recommended screen diagonal measurement, inches (cm)	Total weight ^b , lbs (kg)	Height of center of gravity above supporting surface, inches (cm)	Angle of unstable equilibrium ^a
Up to 13 (33.02)	25 (11.34)	6-3/4 (17.15)	25°
14 - 16 (35.56 - 40.64)	35 (15.88)	7-1/2 (19.05)	25°
17 - 20 (43.18 - 50.80)	50 (22.68)	9 (22.86)	22°
21 - 24 (53.34 - 60.96)	70 (31.75)	10 (25.40)	21°
25 - 27 (63.50 - 68.58)	95 (43.09)	11 (27.94)	20°
28 - 32 (71.12 - 81.28)	135 (61.23)	13 (33.02)	15°
33 - 35 (83.82 - 88.90)	175 (79.38)	15 (38.10)	15°
36 - 40 (91.44 - 101.60)	240 (108.86)	17 (43.18)	13°

^a The fixture shall be stable in the forward direction at the angle specified and become unstable (tip over) when the angle is increased by 1 degree.

^b Includes weight of test fixture.

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Dud 7 FGS
Moses

~~F~~ approved
attached
5/27/99

gmac



Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502

Phone: 800-537-8560
419-446-2711
Fax: 419-446-4944
E-mail: lroth@sauder.com

Fax Transmission Sheet

Date: 05/27/99
To: Terry Rodgers
Company: U.S. Consumer Product Safety Commission Fax: 301 504 0359
From: Loren Roth *[Signature]*
Subject: 5155 RECALL - Additional Press Release

No. of Pages (including cover): 2

Dear Mr. Rodgers,

Attached is a press release Sauder would like to issue today as a follow up to the 5155 Recall. Please review and approve it.

We look forward to your prompt response.

Regards,
SAUDER WOODWORKING CO.

Loren Roth
Corrective Action Coordinator

[Handwritten notes and signatures]
P.O.P.
Call P (to) Home
M sign
6/23 - SK
Vally
240

Contact: Susan Dountas
Director of Marketing, Sauder Woodworking Co.
419/446-3530

NOTICE TO MEDIA

ARCHBOLD, Ohio – On May 24, 1999, Sauder Woodworking Co., in cooperation with the U.S. Consumer Safety Commission (CPSC), issued a recall of nearly 2 million television carts. Sauder recalled models with following models with swivel tops: brown oak (model 5155), black oak (model 5055) and white oak (model 5251).

Consumers may have received a busy signal when calling Sauder due to high call volume. Beginning on Friday, May 28, Sauder is expanding telephone service to make it faster and easier for consumers to reach customer service representatives. For a free repair kit, call 1-888-800-4590 from 7AM to 11PM EDT, Monday through Friday. Operators will also be available this weekend and on Memorial Day from 7AM to 11PM EDT.

###

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Date: May 12, 1999

To: Loren Roth,
Recall Coordinator, Sauder Woodworking

From: Kathleen Begala,
Director of Public Affairs, CPSC

Subject: Adding a Shot to the Video News Release

To accurately depict the hazard associated with the recalled Sauder television carts, CPSC proposes to have Potomac Television film a cart tipping and a television falling off of the cart. This shot will be added to the video news release as part of the additional b-roll, providing television stations the option of using this shot when reporting the recall to their viewers.

This proposal simply shows visually what has already been agreed to in the language of the press release: "The carts can tip over and injure children and adults when the cart and the television fall...Sauder has received 13 reports of these carts tipping over and the television falling."

We believe that the addition of this shot will help ensure that the story is aired on television stations nationwide and that consumers seeing the scenario will realize the potential danger with the carts and call Sauder to get the repair kit.

CPSC will pay for the additional shoot and edit.

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Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502

Phone: 800-537-8560
419-446-2711
Fax: 419-446-4944
E-mail: lroth@sauder.com

Fax Transmission Sheet

Date: 05/06/99
To: Judith Hayes
Company: US Consumer Products Safety Commission Fax: 301 504 0359
From: Loren Roth
Subject: 5155 RECALL-CUSTOMER SERVICE SCRIPT

Copy

No. of Pages (including cover): 3

Judith,

Attached is the Customer Service script for the 5155 recall. The script is intended to assist Customer Service Representatives answer questions consumers may have. It was written by Sauder Customer Service Reps and reflects what they expect to hear from consumers.

Please review for approval.

Thanks,
SAUDER WOODWORKING CO.
Loren Roth
Corrective Action Coordinator

2427

CUSTOMER SERVICE
5155 RECALL

Consumer: I received your letter in the mail regarding the 5155 recall. (What's this all about? Did someone get hurt? What are you saying? What's the scoop? What does this mean?)

CSR: Many TV's manufactured today have unequal weight distribution with the majority of the weight at the front of the unit. In certain circumstances placing a television on the cart close to the front edge could cause the cart to tip over.

We have designed a kit accompanied with instructions that meet the Consumer Product Safety Committee's guidelines. This kit comes with a small and large extension molding as well as screws to attach them.

This easy to install kit comes with complete instructions and will take approximately 10 minutes to complete.

Consumer: I have the cart and it works well for me. We have never had a problem and there are no children in the house.

CSR: We strongly recommend that you install the kit for your safety as well as visitors to your home. I will send the easy to install kit to you at no charge with complete instructions. The assembly will take approximately 10 minutes to complete.

Consumer: I do not want the unit or the kit! I want my money back!

CSR: I'll need to ask you a few questions. Do you recall what store you purchased your unit from? Do you still happen to have your purchase receipt? (If no) We need to identify the unit. Are you near the unit? Please read to me: (we'll use one of the following and probably alternate to prevent fraud)

- what is printed on the strike plate?
- what is printed on a caster?
- what is the 6 digit number in the lower right corner of the warning label on the back of the unit?

If you feel that the kit is unacceptable I can send you a \$50.00 rebate coupon toward the purchase of another Sauder item. Before processing this rebate, I will need to receive back the four casters to your unit. Please send them by certified mail to:

249

Sauder Woodworking
Attn: Rebate Dept.
P.O. Box 156
Archbold, OH 43502

***If necessary to give a refund, the amount would be for \$39.99 if there is no receipt after the casters are received. Please fill out a refund form.

***If necessary, we can refund for return of casters. It will cost between \$5.00 to \$5.45 to return them certified mail. Please fill out a refund form.

Consumer: If this is such an unsafe unit why is it taking a week to ten days to receive the retrofit kit?

CSR: We will ship the kit to you by UPS ground service. It will leave our facility within 48 hours and it is generally ships in four to five business days to California. If you are concerned about immediate safety, you can remove the casters from your unit promptly. The kit I am sending will provide additional safety measures.

~~Can't find what casters?~~
no
the television and
VCR from your
unit promptly!
mess. to Rath on
5/7 @ 3:05 pm
re change
JA
V



Sauder Woodworking Co.
502 Middle Street
Archbald, OH 43502

Phone: 800-537-8560
419-446-2711
Fax: 419-446-4944
E-mail: lroth@sauder.com

Fax Transmission Sheet

Date: 05/06/99
To: Judith Hayes
Company: US Consumer Products Safety Commission Fax: 301 504 0359
From: Loren Roth *Loren Roth*
Subject: 5155 RECALL-CUSTOMER SERVICE SCRIPT

No. of Pages (including cover): 3

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Please review for approval.

Thanks,
SAUDER WOODWORKING CO.
Loren Roth
Corrective Action Coordinator

246

CUSTOMER SERVICE
5155 RECALL

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CSR: Many TV's manufactured today have unequal weight distribution with the majority of the weight at the front of the unit. In certain circumstances placing a television on the cart close to the front edge could cause the cart to tip over.

We have designed a kit accompanied with instructions that meet the Consumer Product Safety Committee's guidelines. This kit comes with a small and large extension molding as well as screws to attach them.

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247

Sauder Woodworking
Attn: Rebate Dept.
P.O. Box 156
Archbold, OH 43502

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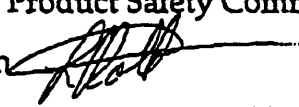
248



Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502

Phone: 800-537-8560
419-446-2711
Fax: 419-446-4944
E-mail: lroth@sauder.com

Fax Transmission Sheet

Date: 04/28/99
To: Judith Hayes
Company: Consumer Product Safety Commission
From: Loren Roth 
Subject: 5155 RECALL - DRAFT CONSUMER NOTIFICATION MATERIALS

No. of Pages (including cover): 4

Attached, for your review and approval, are the following:

1. Front of the Consumer Notification Card.
2. Reverse side and text of the Consumer Notification Card.
3. Point of Purchase Counter Card.

The counter card will be self-supporting and 11" x 19" in size. Discount retailers, such as K-mart, sold the majority of the recalled units. Sauder intends to ask these retailers to display the counter cards in the furniture display and in the stores Customer Service area. Most discount retail stores do not have room to place signs by the many checkout aisles. Customer Service desks are usually conveniently placed for consumers to see signs. Placing the notification in the furniture area is also a good way to notify a large group of consumers.

I called Ms. Jane Francis earlier today. Unfortunately, she was not in so I left a message giving her a brief update of the progress Sauder has made on the recall. I also left Sauder's telephone number if she has any questions.

Finally, we have received your fax with the approved text for the press release and Chairman Brown's text.

Regards,
SAUDER WOODWORKING CO.

Loren Roth
Recall Coordinator

249

Sauder Woodworking Co.
502 Middle St.
Archbold, Ohio 43502

IMPORTANT SAFETY NOTICE!

Consumer Notification Letter-Front

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IMPORTANT SAFETY NOTICE!

Sauder records indicate you purchased a TV/VCR cart that has been recalled for safety concerns. The model was produced in three colors: #5155 (brown oak), #5055 (black oak), or #5251 (white oak). About 2 million of these carts were sold between 1989-1998. Sauder has received 13 reports of these carts tipping and the TV falling. Two injuries have been reported. A 3-year-old suffered a skull fracture, and an adult woman suffered a bump to the head and a cut finger.

Please remove the television and VCR from your cart immediately and call Sauder toll-free at the number listed below between 7 AM and 11 PM EDT to order a free repair kit. The repair kit will help prevent the cart from tipping over.

Thank you for your cooperation and understanding.

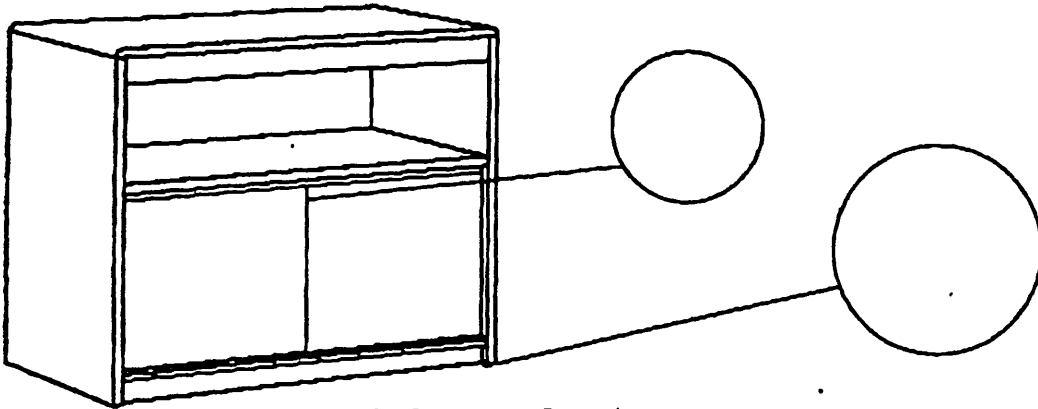


1 • 888 • 800 • 4590

Consumer Notification Letter - Reverse

251

IMPORTANT SAFETY NOTICE



TO ALL OWNERS OF:

TV/VCR Cart Model #5155 (brown oak)
#5055 (black oak)
#5251 (white oak)

Sauder Woodworking Co. is recalling about 2 million TV/VCR carts sold between 1989-1998 after receiving 13 reports of these carts tipping and the TV falling.

Most of the carts have the name Sauder on the casters, on a caution label on the back of the cart, or on a metal plate inside the cart's doors. The carts measure 29-1/2 inches wide, 25 inches high with casters, and 15-1/2 inches deep. The shelf holding the television swivels.

If you own one of these models, call Sauder toll-free at the number listed below between 7AM and 11PM EST to order a free repair kit. The repair kit will help prevent the cart from tipping over.

SAUDER®

1-888-800-4590

Self-Supporting Counter Card.

Actual size: 11" x 19"

252



Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502

Phone: 800-537-8560

419-446-2711

Fax: 419-446-4944

E-mail: lroth@sauder.com

Fax Transmission Sheet

Date: April 23, 1999
To: Ms. Judith Hayes
Company: Consumer Products Safety Commission Fax: 301 504 0359
From: Loren Roth
Subject: SAUDER WOODWORKING TELEVISION CART RECALL CPSC CA980039

No. of Pages (including cover): 1

Below is a summary of my notes of our telephone conversations of April 20-23. We provide them to ensure Sauder's efforts are correctly focused as we move forward on the recall.

1. Press Release – We agreed to remove the reported 2-yr-old suffering a skull fracture. From the information both CPSC and Sauder have, a TV fell off the cart. There is no indication the cart tipped. We also agreed to a couple of other wording changes. After our initial agreement on the telephone, you called to let me know the next draft would have an additional paragraph. Sauder received the draft with the additional paragraph the afternoon of April 22. Sauder objects to the added paragraph because it weakens the message of the television cart recall, it implicates Sauder Woodworking in all furniture injuries, and it is a last minute addition after several drafts had been discussed. Sauder's objections are currently being reviewed at CPSC.

When the press release is finalized, CPSC will release it through its Public Affairs office.

Proposed date of the press release is changed to the week of May 10. The exact date is to be determined.

2. Retrofit Instructions - You confirmed the retrofit instructions are acceptable as revised.
3. Retrofit Screw Length - You confirmed CPSC engineers accept the screw length in the retrofit kit. CPSC agrees the screws will provide support for the retrofit kit.
4. Toll-Free Telephone Line – Sauder will have a toll-free telephone number dedicated for consumers calling about the recall for six (6) months. The same information is to be available to consumers for a total of 12 months on toll-free telephone lines. If a telephone number is used for calls other than the recall, CPSC requests a recording informing consumers that recall information is available.
5. Website Posting – On Sauder's homepage, CPSC requests notation informing consumers how to find recall information. The example used is a "Recall" button on the homepage. Browsers pushing this button would receive information on the recall. Often, the press release is the information given on websites.
6. VNR – The VNR is released at the same time as the press release. Before shooting the VNR, CPSC Public Affairs office needs to approve the slates and shot list. Sauder responded separately to the CPSC suggestion for soundbites.
7. Samples – CPSC requested five (5) unassembled samples of Model 5155 and five (5) samples of the retrofit kit. The samples are for viewing purposes only and will provide CPSC regional offices with examples of the recall. The samples are to be sent to ATTN Judith Hayes, U.S. Consumer Products Safety Commission, Office of Compliance, Rm. 613, Washington, DC 20207
8. You provided the name of Ms. Jane Francis of CPSC Pubic Affairs as a contact for assistance in writing the various documents used for the recall.

253



Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502

Memorandum

Phone: 800-537-8560
419-446-2711
Fax: 419-446-4944
E-mail: lroth@sauder.com

To: Ms. Judith Hayes, CPSC
From: Loren Roth / David Dietrich / ss
Date: 04/19/99
Re: Suggested Instruction Sheet Changes for 5155 Recall Kit

Changes to Instruction Sheets for 5155 Recall Kit as per CPSC recommendations were made.
Copies are included with this fax.

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5055/5155/5251 REPAIR KIT



Parts and hardware included in this kit:

- 1 Large Extension Molding
- 1 Small Extension Molding
- 1 Anti-Skid Pad
- 16 2" Pan Head Screw
- 1 Caution Label

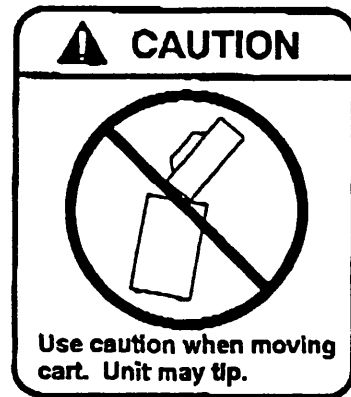
Tool needed:



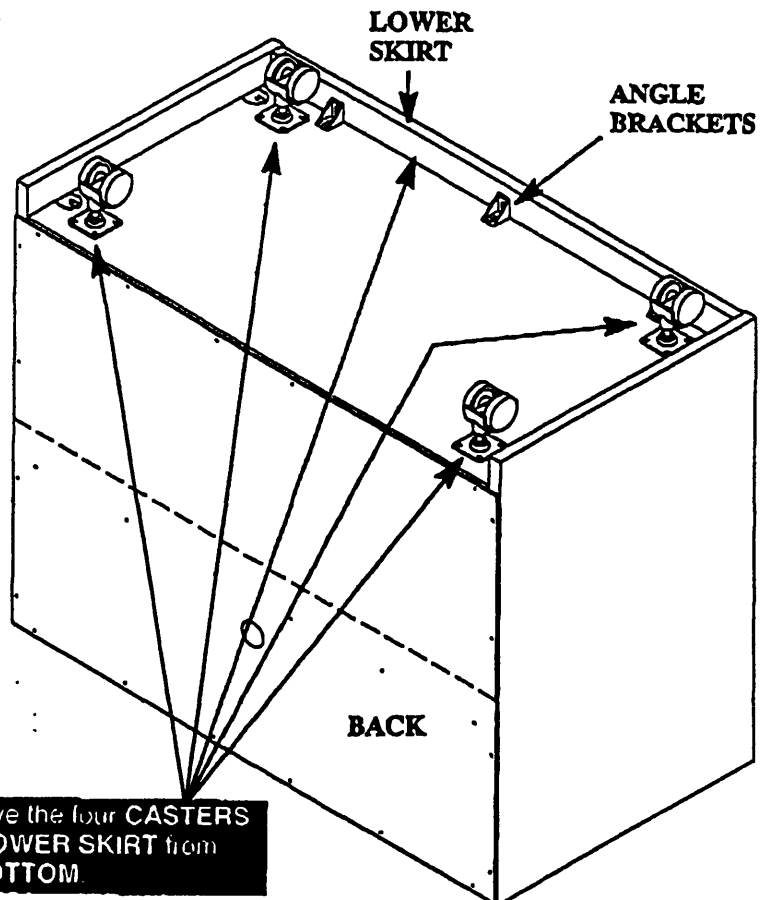
NO. 2 PHILLIPS SCREWDRIVER

1 Completely unload your unit.

2 If your unit does not have a caution label affixed to it, apply this label to the BACK.



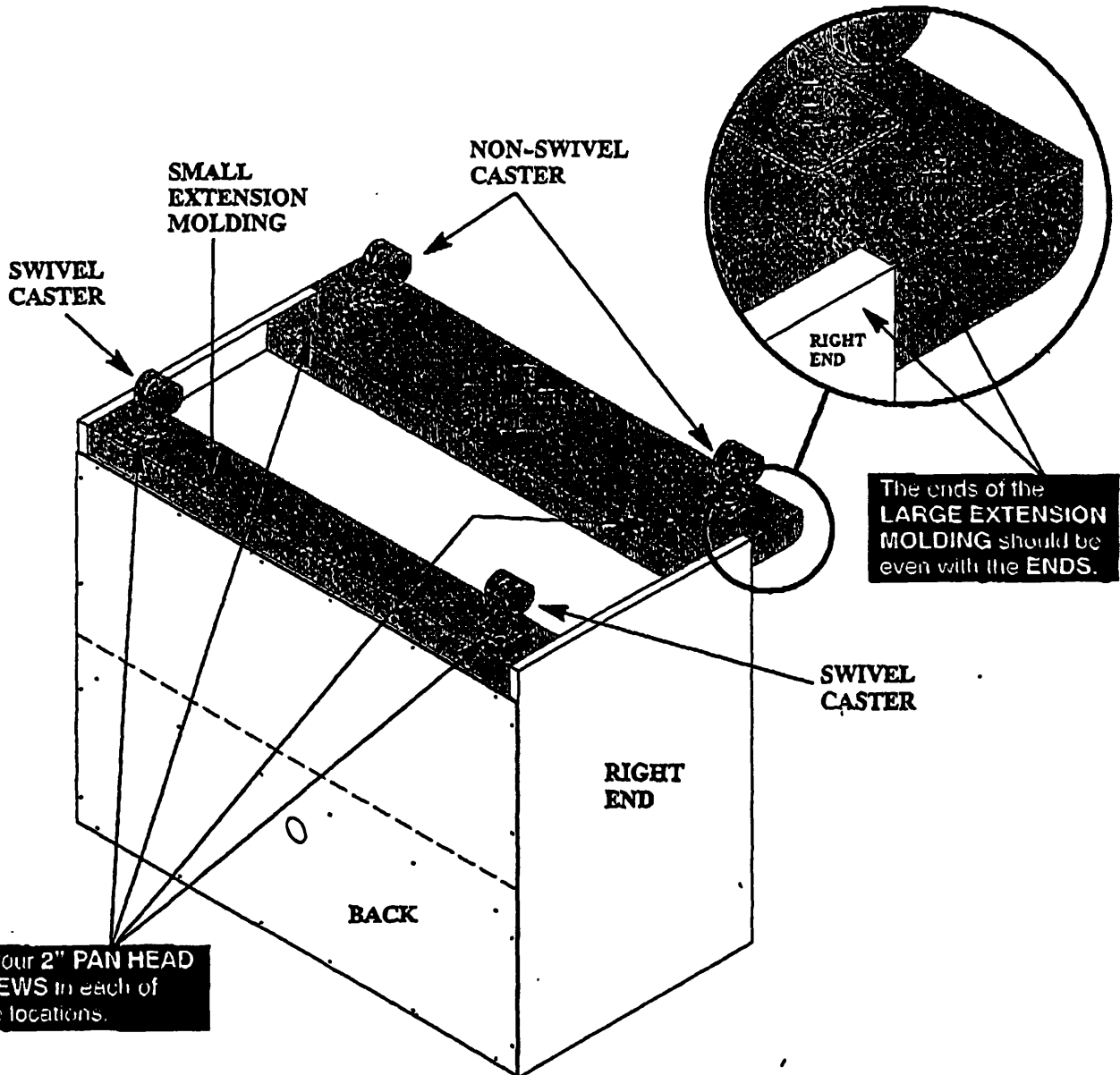
3 Carefully position your unit as shown. Remove the four CASTERS and LOWER SKIRT from the bottom. To do so, remove all SCREWS from the CASTERS and ANGLE BRACKETS. Save the SCREWS. Some will be used later. Discard the LOWER SKIRT.



4 Fasten the **SMALL EXTENSION MOLDING** and **SWIVEL CASTERS** to the **BOTTOM** as shown. Use eight 2" **PAN HEAD SCREWS** through the **SWIVEL CASTERS**, through the **SMALL EXTENSION MOLDING**, and into the **BOTTOM**.

5 Use eight 2" **PAN HEAD SCREWS** to fasten the **LARGE EXTENSION MOLDING** to the **BOTTOM** as shown.

6 Use eight 9/16" **LARGE HEAD SCREWS**, which you removed from the **CASTERS** in step 3, to fasten the **NON-SWIVEL CASTERS** to the **LARGE EXTENSION MOLDING**. Be sure the **CASTERS** are positioned exactly as shown, facing the front edges of the unit.



7 Carefully position your unit upright. To help prevent the TV from sliding, place the **ANTI-SKID PAD** under the front support of the TV or divide amongst the front supports if more than one.



Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502

Phone: 800-537-8560

419-446-2711

Fax: 419-446-4944

E-mail: lroth@sauder.com

Fax Transmission Sheet

Date: 04/16/99
To: Judith Hayes
Company: CPSC Fax: 301 504 0359
From: Loren Roth
Subject: 5155 RECALL PRESS RELEASE - CPSC CA980039

No. of Pages (including cover): 1

1. Attached is a draft press release for your review. Written text for the Retail Poster and VNR will be based on the press release. Therefore, Sauder thinks it is best for us to agree on the press release and then Sauder will submit text for the Retail Poster and the VNR script.

Please advise us on the press release as soon as possible.

2. Instructions for the retrofit are revised and will be faxed to you separately for approval.
3. Screw length for the retrofit kit. The retrofit uses the longest screws possible. Longer screws would push through the bottom of the 5155 cart. In addition, Sauder's test lab did a quick test on the strength of the screws. Four hundred (400) pounds were placed on the front of the swivel top for 24 hours. The screws held. The 5155 cart is rated for a 95 pound 27 inch TV. I trust this will resolve the concerns of CPSC engineering staff.

Regards,
SAUDER WOODWORKING CO.

Loren Roth
Loren Roth

Corrective Action Coordinator



News from CPSC

Draft Press Release 4/15/1999

WASHINGTON, D.C. – In cooperation with the U.S. Consumer Product Safety Commission (CPSC), Sauder Woodworking Co. of Archbold, Ohio is recalling about 2 million television carts. The carts can tip over and injure children and adults when the cart and television fall. This is part of an industry-wide effort by TV Cart manufacturers to reduce tipping hazards.

Sauder has received 14 reports of these carts tipping over and the TV falling. Three injuries have been reported. Reported injuries include a 2 year old girl and a 3 year old girl with head injuries. An adult woman suffered a head bump and cut finger.

Three television cart models are being recalled: models 5155, 5251, 5055. The wooden carts are brown oak, black oak, or white oak. The carts measure 29-½ in. wide by 15-½ in. deep by 25-¼ in. high. They have a swivel top, two hinged doors, and hidden casters. Most can be identified with the name "Sauder" on the casters, a caution label on the back, or on a metal plate on the inside of the door.

Discount stores nationwide sold these television carts from March 1989 to September 1998 for \$35 - \$49. The carts were sold ready-to-assemble.

Consumers should remove their televisions and VCR's from the carts immediately and call Sauder at 888 800 4590 between 7 AM and 11 PM EDT to order a free retrofit kit. The retrofit kit will help prevent the cart from tipping over.

"Sauder Woodworking is committed to consumer safety and is reacting quickly to the Consumer Product Safety Commission's concern about ready-to-assemble TV/VCR carts," said Kevin Sauder, president for Sauder Woodworking.

LINE DRAWING OF 5155

MODE = MEMORY TRANSMISSION

START=APR-13 14:21

END=APR-13 14:22

FILE NO. = 142

STN NO.	COM	ABBR NO.	STATION NAME/TEL. NO.	PAGES	DURATION
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-CPSC COMPLIANCE -

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U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

RECALLS AND COMPLIANCE DIVISION

TEL: 301-504-0608

FAX: 301-504-0359

DATE: 4/13/99 PAGES TRANSMITTED 2 + cover

TO: Loren Rath

TITLE: _____

OFFICE: Saunders

FAX #: 419-446-4902

FROM: Judith Hayes

REMARKS: _____

Confirmation copy to follow by U.S. Mail

Fax Transmission Only

NOTE: If all pages are not received, or if you have problems with this transmittal, please contact the person listed above.

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Handwritten mark resembling a stylized '2' or '9' with an arrow pointing upwards.



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

RECALLS AND COMPLIANCE DIVISION

TEL: 301-504-0608

FAX: 301-504-0359

DATE: 4/13/99 PAGES TRANSMITTED 2 + cover

TO: Loren Ruth

TITLE: _____

OFFICE: Saunders

FAX #: 419-446-4902

FROM: Janith Hayes

REMARKS: attachment enclosed

Confirmation copy to follow by U.S. Mail

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U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE
Recalls and Compliance Division

Judith Hayes
Senior Compliance Officer
Tel: 301-504-0608, Ext. 1355
Fax: 301-504-0359
email: jyayes@cpsc.gov

April 13, 1999

Via Fax (419) 446-4902

Loren Roth
Corrective Action Coordinator
Sauder Woodworking Co.
502 Archbold, OH 43502

Re: CPSC CA980039
Sauder Woodworking Co.
Television Cart Model 5155

Dear Mr. Roth:

Thank you for your letter of April 12, 1999, outlining Sauder's proposed corrective action program. The following is a list of concerns regarding the proposed program as discussed in our telephone conversation today.

1. Our engineering staff is concerned that the screws that attach the extension molding may not be long enough to adequately hold it in place. It is my understanding that your staff will review this matter.
2. Our Human Factors staff reviewed the instruction sheet and concluded the wording would be more explanatory if certain modifications were made to the language and illustrations. The suggested changes are attached for your reference.
3. It is our understanding that Sauder's "800" telephone number dedicated to the program will be in existence for 6 months. We recommend that once the 6 months is over, the same consumer information provided by the dedicated telephone number should be provided on Sauder's general "800" telephone number for an additional 6 months.

Page 2

4. Although not discussed on our telephone conversation, I would like to request a copy of the program's information script to be provided to Sauder's customer service staff .

Also as discussed, Sauder is to submit for our review drafts of the video news release, retail posters, press release, customer notification card, website posting, and sales force notice by Thursday, April 22, 1999. Please inform me of any change in this expected due date.

Thank you.

Sincerely,



Judith Hayes
Senior Compliance Officer



DRAFT- FOR OFFICIAL USE ONLY- DRAFT

Content

Step 3 should be revised to state: Carefully position your unit as shown. Remove the four **CASTERS** and **LOWER SKIRT** from the bottom. To do so, remove all **SCREWS** from the **CASTERS** and **ANGLE BRACKETS**. Save the **SCREWS**. Some will be used later. Discard the **LOWER SKIRT**.

Graphics

Suggestions for improving the graphic next to step 3 include labeling the angle brackets and lower skirt for easy identification. The caption below this graphic needs to be made consistent with the suggested changes in step 3. Identifying the back of the cart (with the word **BACK**) and the swivel and nonswivel casters in the last graphic on page 2 may assist in correct installation.

Other

The top of the instructions next to the parts and hardware supplied should include the tool(s) needed.

Conclusion

Overall, the instructions are relatively easy to carry out and should pose no major problems for consumers. Suggested changes are provided.

2/12



Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502

Phone: 800-537-8560
419-446-2711
Fax: 419-446-4944
E-mail: lroth@sauder.com

Fax Transmission Sheet

Date: 04/12/99
To: Ms. Judith Hayes
Company: U.S. Consumer Product Safety Commission Fax: 301 504 0359
From: Loren Roth
Subject: UPDATE ON SAUDER WOODWORKING CORRECTIVE ACTION

No. of Pages (including cover): 3

Attached, per my telephone message, is an update on progress on Sauder's corrective action.

Regards,
SAUDER WOODWORKING CO.
Loren Roth

A handwritten signature in black ink, appearing to read "Loren Roth", is written over the printed name.

Handwritten initials or a signature in the bottom right corner of the page, possibly "JH" or similar.



Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502

Phone: 800-537-8560
419-446-2711
Fax: 419-446-4944

April 12, 1999

Ms. Judith P. Hayes
Senior Compliance Officer
U.S. Consumer Product Safety Commission
Washington, D.C. 20207

RE: CPSC CA980039
Sauder Woodworking Co.
Television Cart Model 5155

Dear Ms. Hayes:

As Sauder Woodworking Co. prepares to implement the corrective action plan for Model 5155 and related TV Carts (Models 5055 and 5251), I felt it is important to update you on our efforts and assumptions as we proceed to ensure our efforts are correctly focused. The status of our current efforts follows:

1. Based on CPSC's approval of our proposed retrofit kit and instructions, we will schedule production of the retrofit parts and instruction sheets. We anticipate having an adequate supply of materials to allow us to immediately ship retrofit kits in response to all consumer inquiries.
2. We are working on a consumer notification program including the following:
 - A. Point of Sale Posters. We are reviewing our records to develop a list of current Sauder retailers and distributors who previously purchased the affected products for retail sale out of inventory. Once this list is developed the retailers and distributors will be provided with Point of Sale Posters for posting in store sales areas where these products have been displayed. We are preparing a draft Point of Sale Poster for CPSC staff review and will forward the draft to you once it is completed. We will request the Point of Sale Posters remain posted for six months.
 - B. Direct Mailing. Sauder has a list of customers who purchased the affected models and returned warranty cards. We are preparing a draft customer notification card for CPSC staff review and will forward the draft to you once it is completed. Upon approval, the customer notification card will be sent to all customers who have been identified.
 - C. Website Posting. As part of the corrective action plan, information concerning the corrective action program will be included in Sauder's website (www.sauder.com). The website posting will generally follow the information contained in the Point of Sale Poster and consumer notification cards.
 - D. Press Release. A joint press release will be issued as agreed upon between CPSC and Sauder.
 - E. Video News Release. Sauder contacted two of the VNR production companies on the list provided by CPSC. One in particular (Potomac) seemed helpful. We are following up to determine the turnaround time, cost, and feasibility of preparing and disseminating a video news release regarding the corrective action program. We will keep you advised of the results of these efforts.
 - F. Sales Force Notification. Sauder sales representatives will be advised of the details of the corrective action program so that they can effectively interact with retailers and distributors to respond to any questions that may arise during the program.

3. Customer communications will be based on an "800" telephone number program with inquiries answered by Sauder's Customer Service staff. Our Customer Service staff will also be provided with the details of the corrective action program so they can effectively respond to any questions consumers may raise regarding the program. Information obtained from consumers will allow Sauder to promptly ship a retrofit kit to the consumer and to complete a CPSC monthly progress report. The corrective action plan will be in effect for six months, although the retrofit kit will be available to consumers after the corrective action plan has concluded.
4. Sauder has already begun using claims information and UL 1678 test data to evaluate existing and new products. We are also working with industry groups to evaluate the effectiveness of UL 1678 in predicting foreseeable accidents and to develop an improved consensus standard to address these issues. We are currently reviewing existing TV cart and stand products and focusing new product development on compliance with applicable standards.

Although many Sauder staff members will be working on various aspects of this program, I am acting as coordinator of this corrective action program. As agreed, I will keep you advised of progress by telephone. Obviously, our proposal and agreement to proceed with this corrective action program does not constitute an admission by Sauder Woodworking Co. that either reportable information or a substantial product hazard exists with respect to the affected products.

We will forward proposed Point of Sale Posters, customer notification cards, and other materials to you for review by CPSC staff as soon as our initial drafts are available. In the meantime, please continue to contact me to discuss any questions you may have.

Regards,
SAUDER WOODWORKING CO.



Loren Roth
Corrective Action Coordinator





Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502

419-446-2711

February 23, 1999

Judith Hayes
CPSC
4330 East West Hwy
Bethesda, MD 20814-4408

Judith,

Enclosed please find a sample of the 5155 retrofit kit. Two kits have been sent to you in separate packaging with this same letter. I hope that both boxes will arrive promptly and in good order. The repair kit is comprised of two individual molding pieces, 16 screws, an anti-skid pad, Caution Label, and an instruction sheet. There is a rough draft of the instructions for this kit. No blue prints exist of the molding pieces, only hand sketches at this time. Please review the series of pictures, one through sixteen, which visually walk one through the process (only one set of pictures has been sent).

If there are any questions, which I can answer about the performance of this kit, please do not hesitate to call.

Sincerely,

David Dietrich
David Dietrich
Product Test Lab Manager
419-446-3762



5055/5155/5251 REPAIR KIT

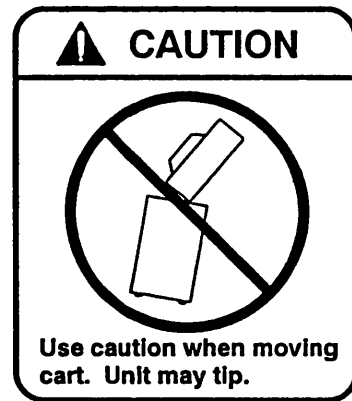


Parts and hardware included in this kit:

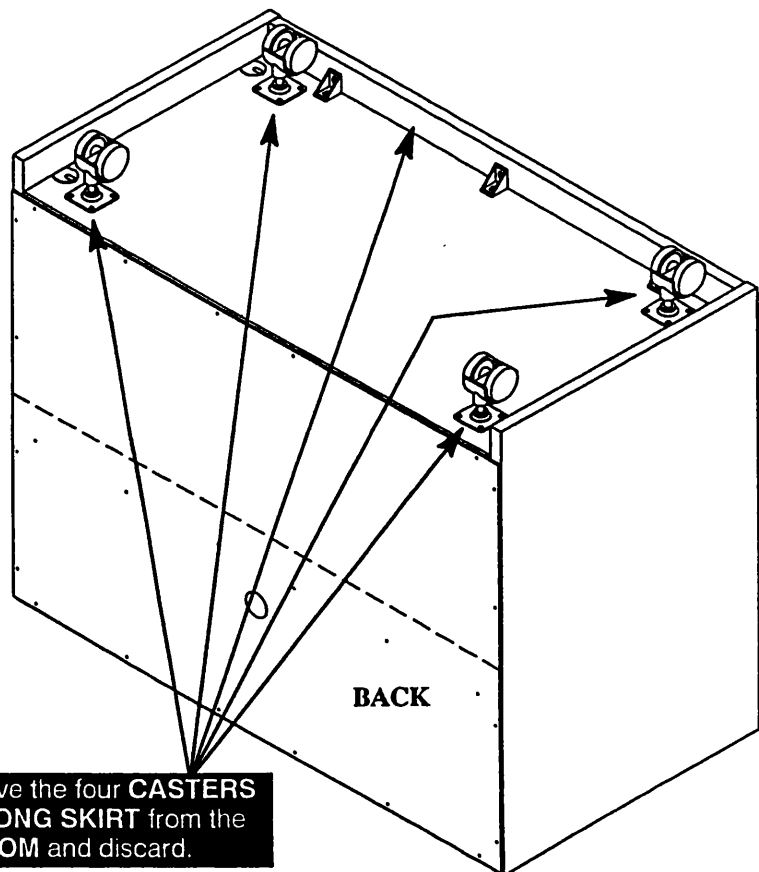
- 1 Large Extension Molding
- 1 Small Extension Molding
- 1 Anti-Skid Pad
- 16 2" Pan Head Screw
- 1 Caution Label

1 Completely unload your unit.

2 If your unit does not have a caution label affixed to it, apply this label to the BACK.



3 Carefully position your unit as shown. Remove the four CASTERS and LOWER SKIRT from the BOTTOM and discard. To do so, remove all SCREWS from the CASTERS and ANGLE BRACKETS. Save the SCREWS. Some will be used later.



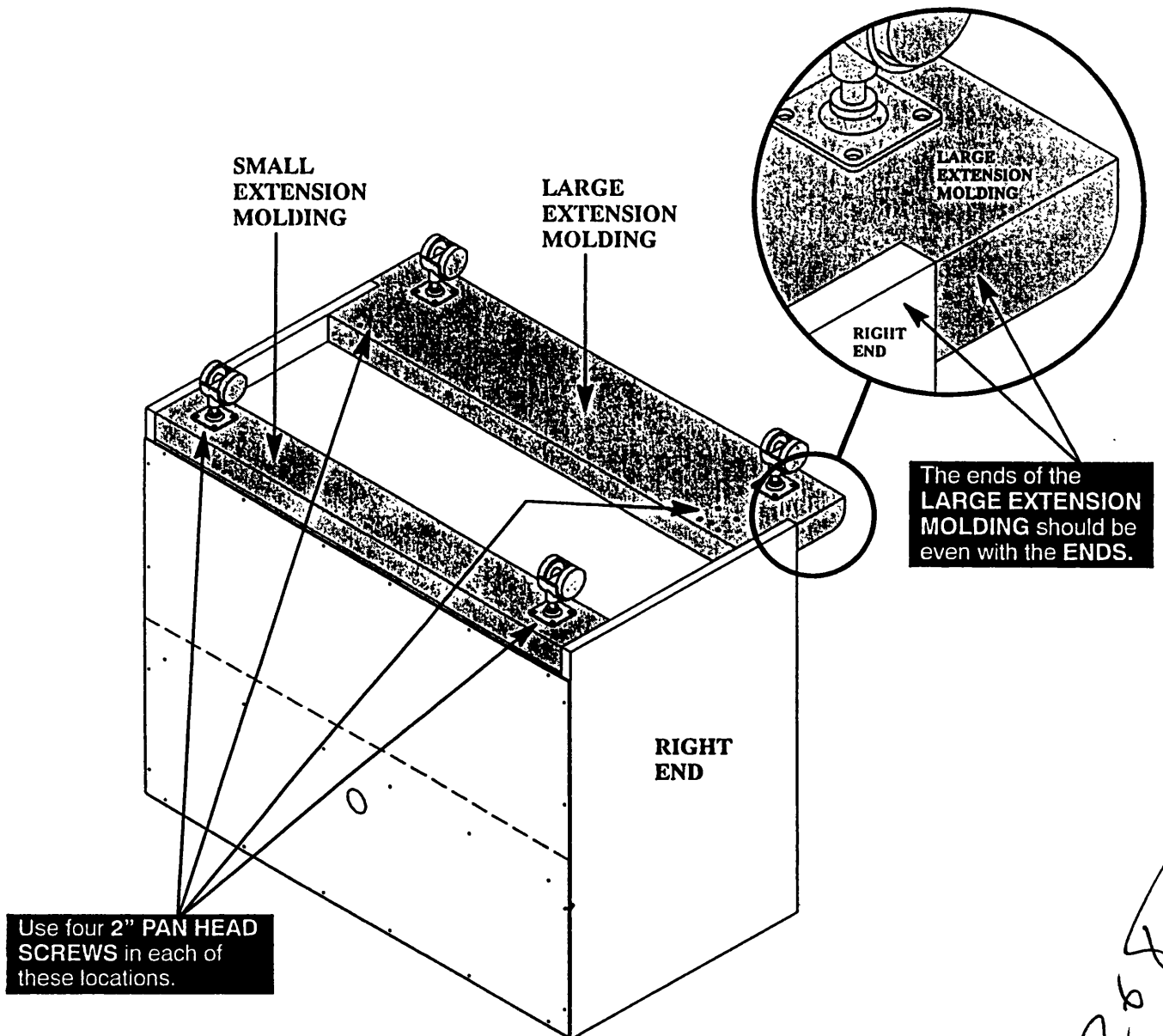
Remove the four CASTERS and LONG SKIRT from the BOTTOM and discard.

267

4 Fasten the **SMALL EXTENSION MOLDING** and **SWIVEL CASTERS** to the **BOTTOM** as shown. Use eight **2" PAN HEAD SCREWS** through the **SWIVEL CASTERS**, through the **SMALL EXTENSION MOLDING**, and into the **BOTTOM**.

5 Use eight **2" PAN HEAD SCREWS** to fasten the **LARGE EXTENSION MOLDING** to the **BOTTOM** as shown.

6 Use eight **9/16" LARGE HEAD SCREWS**, which you removed from the **CASTERS** in step 3, to fasten the **NON-SWIVEL CASTERS** to the **LARGE EXTENSION MOLDING**. Be sure the **CASTERS** are positioned exactly as shown, facing the front edges of the unit.



7 Carefully position your unit upright. To help prevent the TV from sliding, place the **ANTI-SKID PAD** under the front support of the TV or divide amongst the front supports if more than one.



Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502
419-446-2711

February 23, 1999

Judith Hayes
CPSC
4330 East West Hwy
Bethesda, MD 20814-4408

Judith,

Enclosed please find a sample of the 5155 retrofit kit. Two kits have been sent to you in separate packaging with this same letter. I hope that both boxes will arrive promptly and in good order. The repair kit is comprised of two individual molding pieces, 16 screws, an anti-skid pad, Caution Label, and an instruction sheet. There is a rough draft of the instructions for this kit. No blue prints exist of the molding pieces, only hand sketches at this time. Please review the series of pictures, one through sixteen, which visually walk one through the process (only one set of pictures has been sent).

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Sincerely,

David Dietrich
Product Test Lab Manager
419-446-3762



5055/5155/5251 REPAIR KIT



Parts and hardware included in this kit:

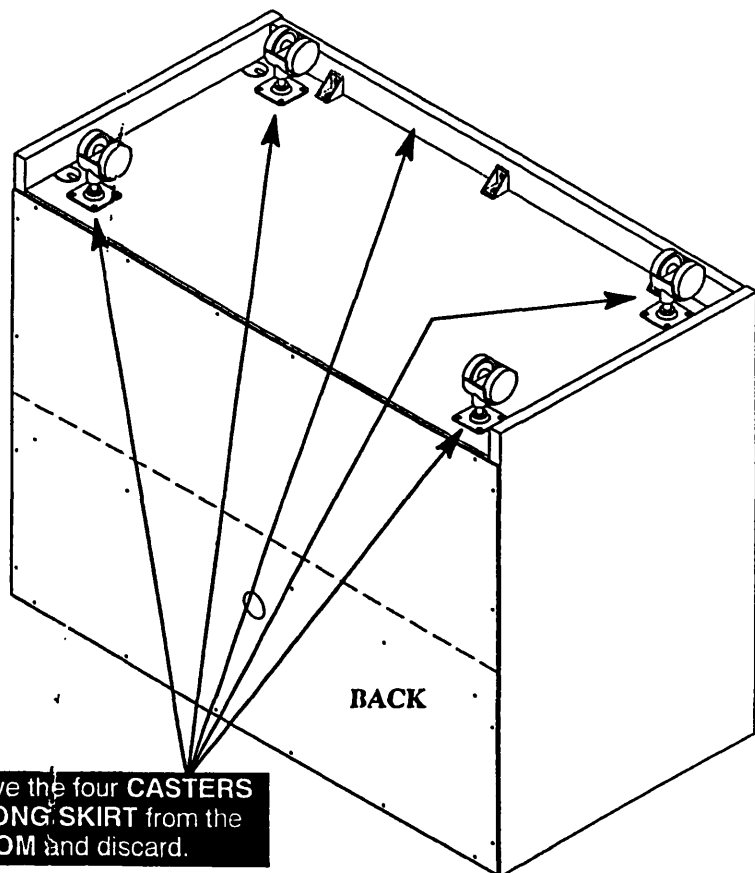
- 1 Large Extension Molding
- 1 Small Extension Molding
- 1 Anti-Skid Pad
- 16 2" Pan Head Screw
- 1 Caution Label

1 Completely unload your unit.

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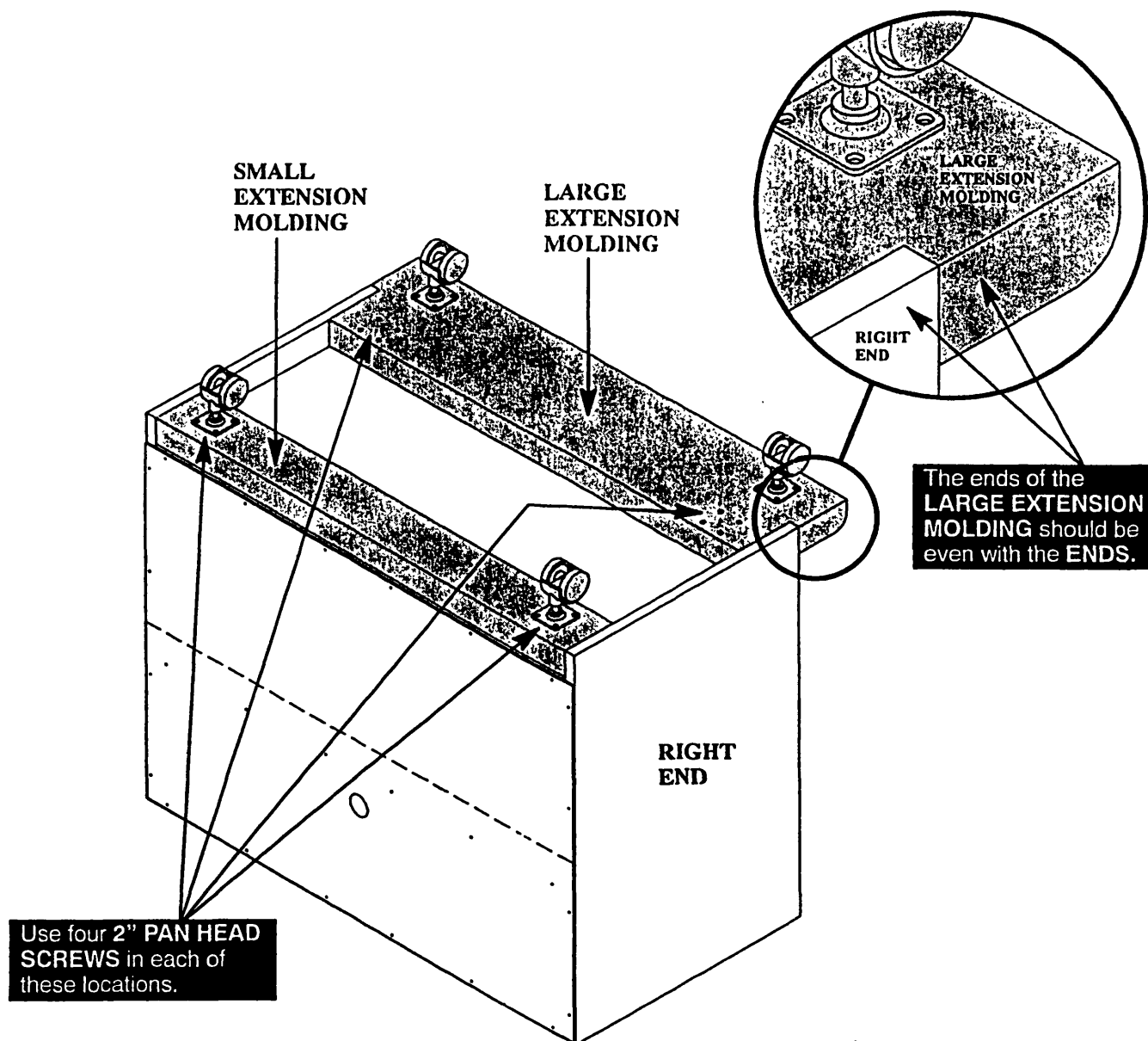
Remove the four CASTERS and LONG SKIRT from the BOTTOM and discard.

270

4 Fasten the **SMALL EXTENSION MOLDING** and **SWIVEL CASTERS** to the **BOTTOM** as shown. Use eight 2" **PAN HEAD SCREWS** through the **SWIVEL CASTERS**, through the **SMALL EXTENSION MOLDING**, and into the **BOTTOM**.

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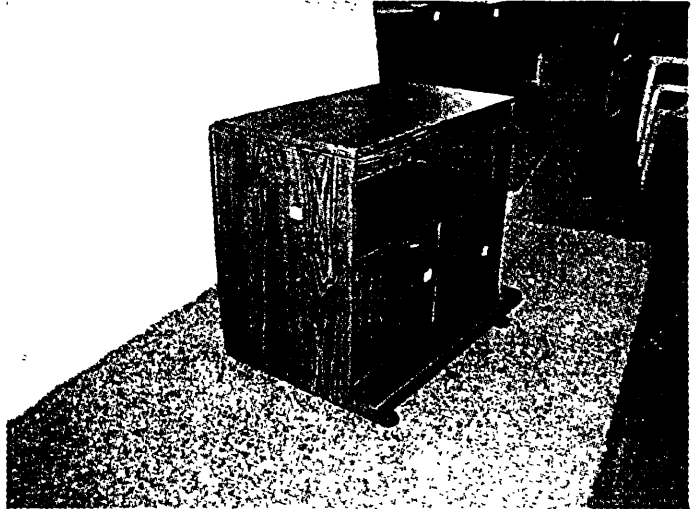


7 Carefully position your unit upright. To help prevent the TV from sliding, place the **ANTI-SKID PAD** under the front support of the TV or divide amongst the front supports if more than one.

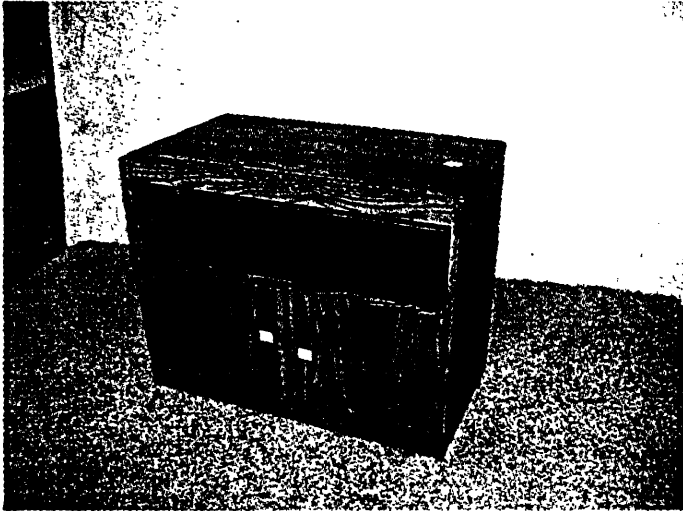
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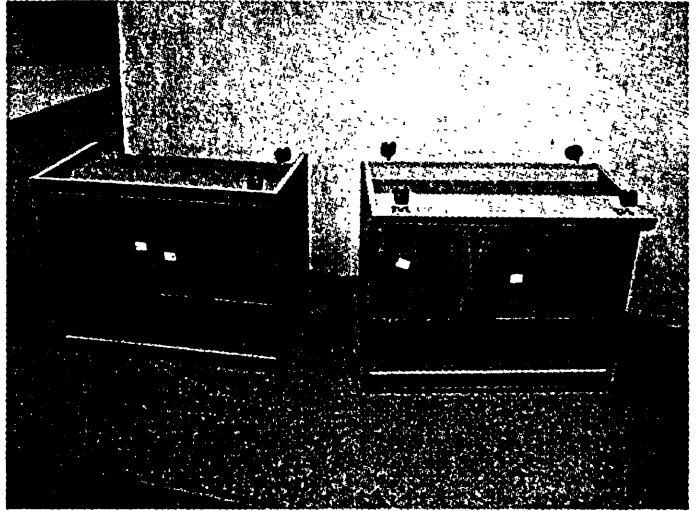
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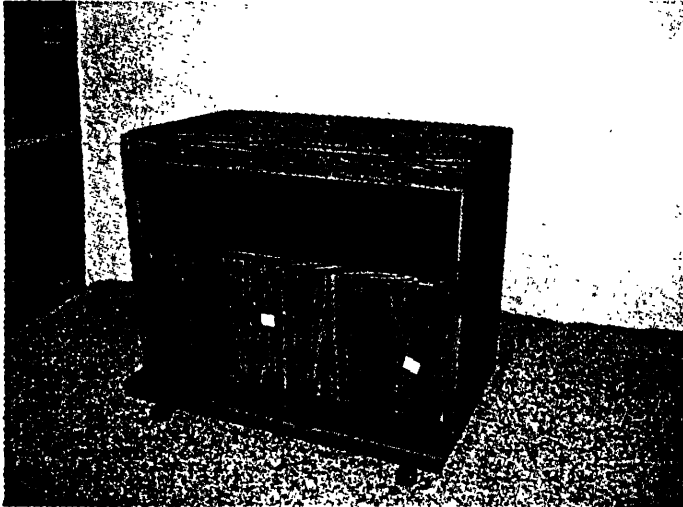
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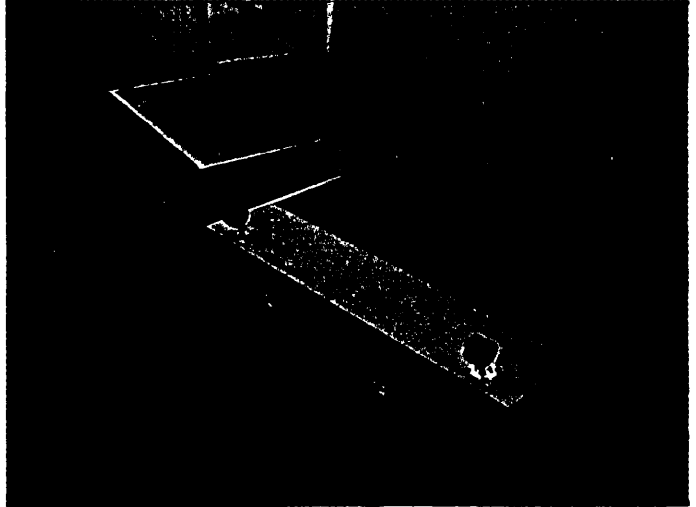
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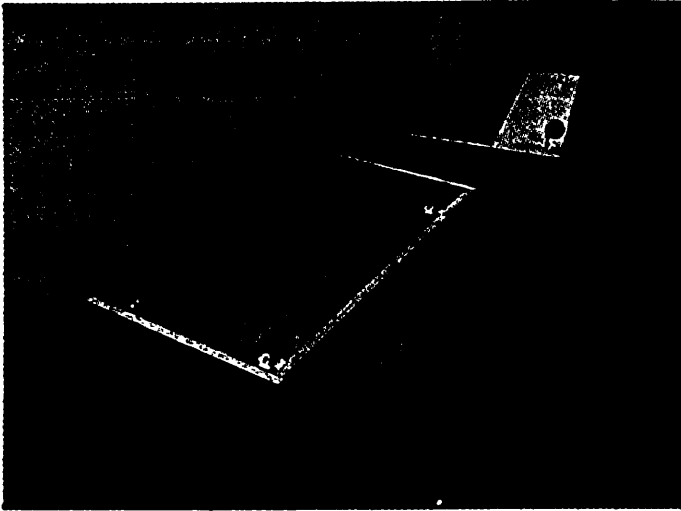


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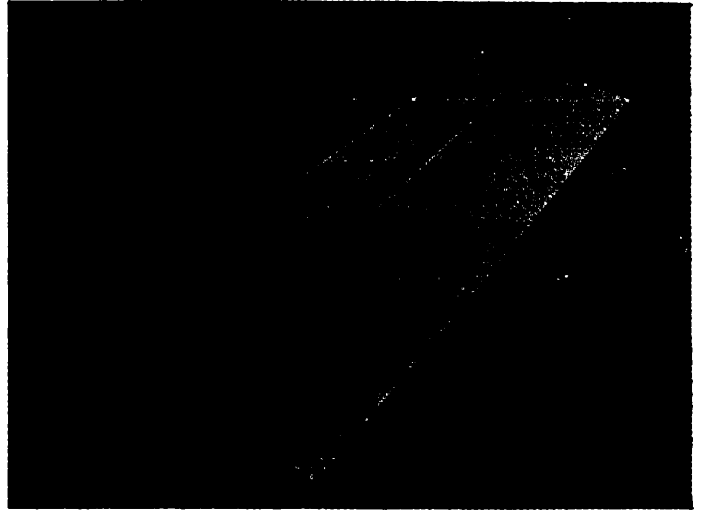


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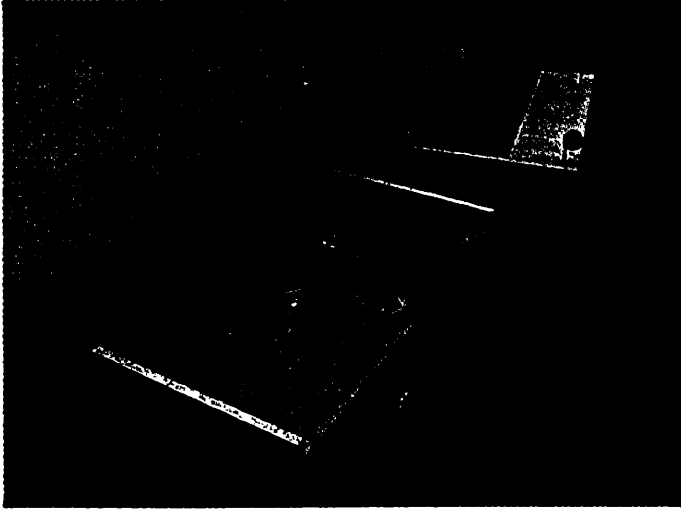
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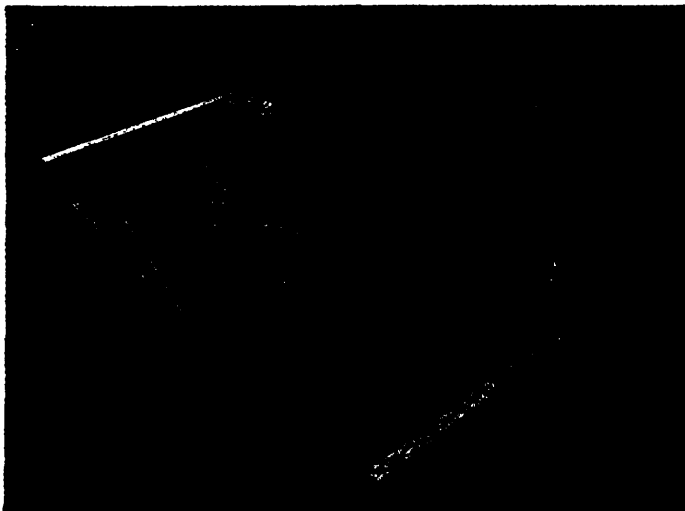


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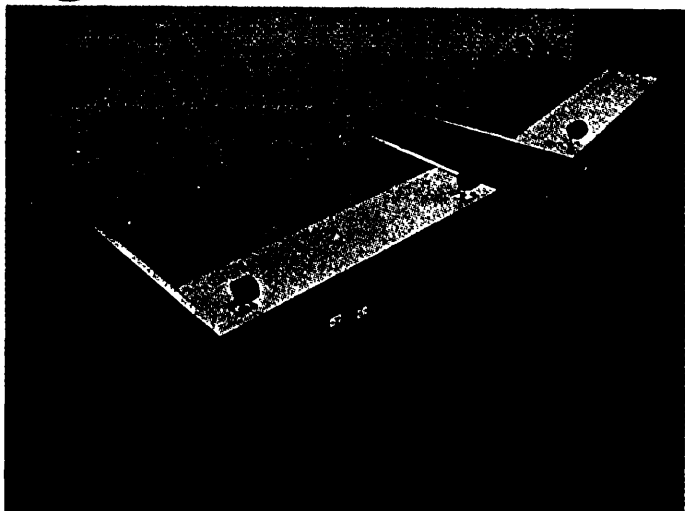


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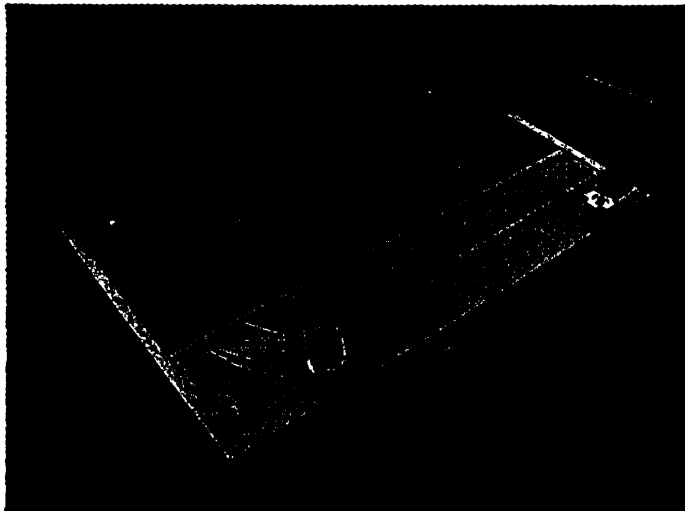
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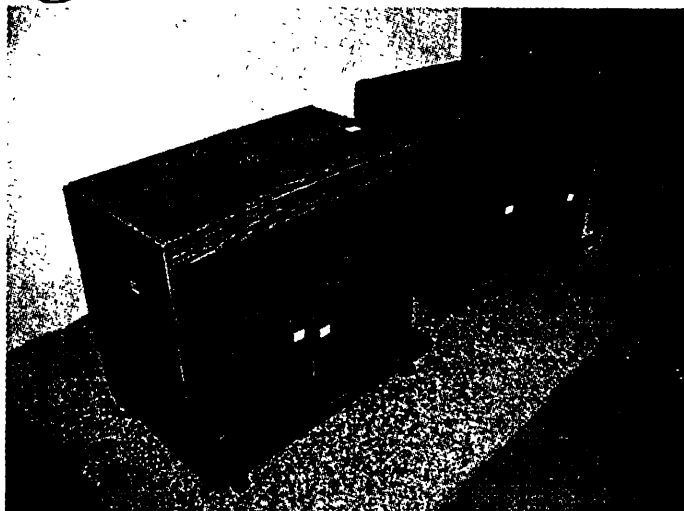
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284



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

RECALLS AND COMPLIANCE DIVISION

TEL: 301-504-0608

FAX: 301-504-0359

DATE: 1/29/99 PAGES TRANSMITTED 2 + cover

TO: Kevin Sauder

TITLE: _____

OFFICE: Sauder Woodworking

FAX #: (719) 446-4902

FROM: Judith Hayes

REMARKS: TV carts

Confirmation copy to follow by U.S. Mail

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Handwritten signature/initials



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207-0001

OFFICE OF COMPLIANCE
Recalls and Compliance Division

Judith P. Hayes
Senior Compliance Officer
Tel: 301-504-0608, ext. 1355
Fax: 301-504-0359

1/29/99
January 8, 1999

Via Fax (419) 446-4902

Kevin Sauder
Executive Vice President
Sauder Woodworking Co.
502 Middle Street
Archbold, OH 43502

Re: CPSC CA980039
Sauder Woodworking Co.
Television Cart Model 5155

Dear Mr. Sauder:

Thank you for your letter of January 15, 1999. Our staff acknowledges Sauder's willingness to comply with our recommendation to offer consumers an incentive to remove casters from the subject TV cart. However, further review of the overall incentive concept as it would apply to this situation concludes that the majority of consumers are not going to remove the casters for any amount, or form, of incentive. This conclusion is based on the determination that consumers would not want to forfeit the main reason for purchasing the cart, its mobility.

Therefore, our staff requests that Sauder develop a retrofit kit that would pass UL 1678 not requiring consumers to remove the casters. In addition, we are willing to consider any other forms of corrective action that Sauder may recommend as an alternative.

276

Thank you for your attention to this matter. A response to our request by Friday, February 5, 1999, would be appreciated.

Sincerely,

A handwritten signature in cursive script that reads "Judith Hayes". The signature is written in black ink and is positioned above the printed name and phone number.

Judith Hayes

(301) 504-0608, ext. 1355

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