



**U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814**

August 19, 2008

CERTIFIED MAIL – RETURN RECEIPT

Ms. Lauri Stevenson, MLS
Safety Research & Strategies, Inc.
340 Anawan Street, Suite 200
Rehoboth, MA 02769

RE: Freedom of Information Request #08-F-00760: Copy of documents released for FOIA Log #2007040099 ~ SUNL Group, Inc., Tao Group, Aim-EX Industry

Dear Ms. Stevenson:

Thank you for your Freedom of Information Act (FOIA) request seeking information from the U.S. Consumer Product Safety Commission (Commission). The records from the Commission files responsive to your request have been processed and copies of the releasable responsive records are enclosed.

The enclosed records include file information generated by the Commission itself or its contractors for regulatory or enforcement purposes. These records are from law enforcement investigatory file designated PI060049, SunL Group, Inc. youth ATV SCA-90R and include memoranda, correspondence and notes. The Commission has established management systems under which supervisors are responsible for reviewing the work of their employees or contractors. The file information materials are final and have been prepared and accepted by the Commission's staff under such review systems. The Commission believes that it has taken reasonable steps to assure the accuracy of the information.

The enclosed also include Epidemiologic Investigation Reports with the underlying and supporting documentation. The Commission has received this information from its formal investigation systems. Through these systems the Commission hopes to learn when specific products are associated with illness, injury or death. The Commission believes that it has taken reasonable steps to assure the accuracy of this information. While conducting the interviews for the investigation reports, Commission staff or contractors have spoken with the individuals involved or with others who witnessed or are familiar with the incidents. Where possible, Commission staff has examined the products reportedly involved in the incidents. Although the Commission has investigated the incidents described in the investigation reports, the Commission has not necessarily determined the cause of the incidents.

Also enclosed are records pertaining to product complaints and reported incidents that were submitted to the Commission by consumers and others. The consumers or submitters have confirmed the accuracy of the information in the complaints and reported incidents. The Commission has neither investigated the incidents nor conducted or obtained any evaluations of the products that corroborate the substance of the information contained in the complaints and reported incidents. In some of the complaints and reported incidents we have removed the identities of the complainants at their request.

We must withhold the Commission's Office of Compliance's active litigation and law enforcement investigatory file, CA070010, pursuant to the FOIA Exemptions 5 and 7(A), 5 U.S.C. § 552(b)(5) and (b)(7)(A). Exemption 5 provides for the withholding from disclosure of inter-agency and intra-agency memoranda which would not be available by law to a party other than an agency in litigation with the agency. Exemption 7(A) provides for the withholding from disclosure records or information compiled for law enforcement purposes, to the extent that the production of such law enforcement records or information could reasonably be expected to interfere with enforcement proceedings.

The records being withheld consist of internal staff memoranda and correspondence containing recommendations, opinions, suggestions and analyses of the Commission's technical and legal staffs. The records constitute both pre-decisional and deliberative discussion that clearly falls within the attorney-client and attorney-work product privileges. Any factual materials in the records not covered by some other exemption are inextricably intertwined with exempt materials or the disclosure of the factual materials would itself expose the deliberative process. We have determined that the disclosure of these certain law enforcement investigatory records responsive to your request would be contrary to the public interest. It would not be in the public interest to disclose these materials because disclosure would (1) impair the frank exchange of views necessary with respect to such matters, and (2) prematurely reveal information used in the investigation, thereby interfering with this and other matters by disclosing the government's basis for pursuing this matter.

The files also contain proprietary and confidential information submitted by the company under investigation that we must withhold pursuant to Exemptions 3 and 4 of the FOIA, 5 U.S.C. § 552(b)(3) and (b)(4), and section 6(a)(2) of the Consumer Product Safety Act (CPSA), 15 U.S.C. § 2055(a)(2). Section 6(a)(2) prohibits the Commission from disclosing information that is exempt from disclosure under Exemption 4 of the FOIA. That exemption protects trade secrets and confidential commercial information directly related to a firm's business that the firm has not made public and whose disclosure could give a substantial commercial advantage to a competitor.

The file information may be subject to disclosure once the cases are closed. You may want to resubmit your request in a few months.

Other records from the Commission files responsive to your request relate to product complaints and reported incidents that the Commission has obtained from consumers, attorneys for consumers and others. The Commission has not received confirmation of the accuracy of the information in the complaints and reported incidents. Pursuant to Exemption 3 of the FOIA, 5 U.S.C. § 552(b)(3) and section 6(b)(1) of the CPSA, 15 U.S.C. § 2055(b)(1), and our regulations, 16 C.F.R. § 1101.32, we must withhold the unconfirmed product complaints and reported incidents.

FOIA Exemption 3 provides for the withholding from disclosure of matters that are specifically exempted from disclosure by another statute. In applying FOIA Exemption 3, we are relying on section 6(b)(1) of the CPSA. That section prohibits the Commission from disclosing information about a consumer product that identifies a manufacturer or private labeler unless the Commission has taken "reasonable steps" to assure that the information is accurate, that disclosure is fair in the circumstances, and that disclosure will be reasonably related to effectuating the purposes of the laws that the Commission administers. See Commission regulation, 16 C.F.R. § 1101.32. The Commission's policy is to withhold each consumer complaint and reported incident unless: (1) the Commission has conducted an investigation of the complaint and reported incident, and the investigation corroborates the substance of the complaint and reported incident; (2) the Commission has conducted or obtained a technical, scientific, or other evaluation of the product that is the subject of the complaint and reported incident, and evaluation corroborates the substance of the information contained in the complaint and reported incident; or (3) the consumer or person reporting or submitting the incident confirms the accuracy of the information. The Commission did not take any of these steps with regard to these certain consumer complaints and reported incidents responsive to your request. While it has been Commission practice since June 1983 to seek confirmation of incoming consumer complaints and incidents, the Commission does not have the resources to seek confirmation of the complaints and incidents where a consumer has not responded to our request for confirmation of the information.

You will note that in the documents disclosed information that could identify injured parties and persons treating them has been deleted, because section 25(c) of the CPSA, 15 U.S.C. § 2074(c)(1), prohibits such disclosures without the consent of those individuals. In some cases the parties have denied consent or consent has not otherwise been obtained.

According to the Commission's FOIA regulations at 16 C.F.R. § 1015.7, a partial denial of access to records may be appealed within thirty (30) days of your receipt of this letter by writing to: **FOIA APPEAL**, General Counsel, ATTN: Office of the Secretary, U.S. Consumer Product Safety Commission, 4330 East West Highway, Bethesda, MD 20814-4408.

Page 4 - Ms. Stevenson
Safety Research & Strategies, Inc.
08-F-00760

Processing this request, performing the file searches and preparing the information, cost the Commission \$70.00. In this instance, we have decided to waive all of the charges.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alberta E. Mills', with a long horizontal flourish extending to the right.

Alberta E. Mills
Freedom of Information Officer
Office of the Secretary
Division of Information Management
Office of Information and Technology Services

Enclosures

CONTENTS OF FILE

CASE NO. PI 060049

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 7/16/07
 APPROVED

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Topka
 COMPLIANCE OFFICER

Sunl Group, Inc.
 FIRM

Jiff Baidonox
 CONTACT

Tarnoff
 LEGAL DIVISION ATTORNEY

11410 Mathis Ave
 FIRM ADDRESS

CONTACT FIRM

Youth ATV SCA-101R
 PRODUCT

Farmers Branch, TX 75236
 CITY, STATE AND ZIP CODE

CONTACT FIRM ADDRESS

Several mechanical hazards
 HAZARD

Sunl.com
 FIRM WEBSITE ADDRESS

CITY, STATE AND ZIP CODE

See CAP 70010

972-243-4555
 TEL. NO.

972-243-0553
 FAX NO.

E-MAIL

Sec15 Id: P1060049

Statr \ctive

Statute: CPSA

Rej dt: 00/00/0000

CmpOfcr: tit

Attorney: hnt

H Priority: b

Reg'l Off: Central

Team: Fueled, Electrical, :

FirmType: Retailer

Firm: SUNL Group, Inc.

Mfrm cont: Alternative Transportation

Mfrm: SUNL Group, Inc.

Mfrm title:

Product: All-Terrain Vehicle

Defect: The ATV does not meet all standards put forth by ANSI/SVIA-1-2001.

Inj Desc: None

Hazard: Mechanical Hazard

Samples:

How disc: Marchica & Deppa

IDI's:

DirCmmnt:

Notifys:

Created: 06/05/2006

Corrects:

PSA:

Origin dt: 06/05/2006

Flags:

Kickoff dt: 06/05/2006

Last Actn: Enter Case - Preliminary Case

Done: 06/05/2006

Next Mile: Close Case

Due: 07/03/2006

Close dt: 00/00/0000

U.S. CONSUMER PRODUCT SAFETY COMMISSION

ARCHIVE FORM FOR CLOSED FILE

FILE NUMBER: PI060049

DATE CLOSED (YYMMDD): 06/11/22

TOTAL UNITS INVOLVED: 1

TOTAL UNITS CORRECTED: 1

REMARKS: Closed. Opened as CA070010.

CAP IMPLEMENTED: YES NO

WHERE THIS FILE IS STORED:

LOCATION:

ACCESSION#:

BOX#:

_____ INCIDENT DATA SENT TO EPI

_____ IDENTIFY/MARK PAGES THAT HAVE INCIDENT
DATA

X NO INCIDENT DATA FOR EPI IN THIS FILE

Topka, Tanya L.

From: Bradford, G. Brent
Sent: Tuesday, July 18, 2006 4:16 PM
To: Topka, Tanya L.
Cc: Englander, Sidney C.; Chairez, Jesus C.
Subject: ATV Sample

Tanya,

Wanted to let you know that sample 06-840-7240 was collected today per assignment 060707CRC1127. I got you a pink one!!!! The sample was shipped from the firm and should arrive at the SSF tomorrow. The C/R is ready in IFS. Wanted to let you know I identified the shipping carton and it is being sent to your attention. The sample is in the original shipping carton and I did not open it so I am sending you the CPSC 165 along with the Sub 1 bar code if you need to attach to the sample. All the documents plus photographs are attached to the C/R and I will go ahead and send you the originals.

Also, the firm did not have any test reports for this particular model.

Let me know if you need anything else.

Brent

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Topka, Tanya L.

From: Bradford, G. Brent
Sent: Tuesday, August 15, 2006 4:51 PM
To: Topka, Tanya L.
Cc: Karen, Michael I.
Subject: RE: 06-840-7240

I wanted to give you an update on this. I spoke with a representative of the firm and was told he was unaware of any assembly instructions for the ATV wheels. He also noted he thought the cotter pins should have been somewhere in the shipping carton for the ATV. Anyway, he told me he was going to get the Director of the Parts Dept. give me a call to further explain the wheel assembly and I will let you know when I hear from him. I am guessing that cotter pins will have to be sent to Mike. Stay tuned!

G. Brent Bradford, Investigator
 U. S. Consumer Product Safety Commission
 2059 Clem Rd. Ext.
 Rockwall, Texas 75087-7973
 972 771-0958 Telephone
 972 771-5963 Facsimile
 CPSC Hotline 1-800-638-2772
 Website www.cpsc.gov

From: Topka, Tanya L.
Sent: Tuesday, August 15, 2006 9:46 AM
To: Bradford, G. Brent
Subject: RE: 06-840-7240

Yes that would be fine. Mike's number is in the directory. I will let him know that someone either you or the firm will be contacting him.

Tanya Topka, Compliance Officer
 U.S. CPSC
 01-504-7594
www.cpsc.gov

From: Bradford, G. Brent
Sent: Tuesday, August 15, 2006 10:13 AM
To: Topka, Tanya L.
Subject: RE: 06-840-7240

Have a quick question. Would it be okay if someone at the firm called Mike to assist in the assembly? I am just thinking the firm might offer to do this etc.

G. Brent Bradford, Investigator
 U. S. Consumer Product Safety Commission
 2059 Clem Rd. Ext.
 Rockwall, Texas 75087-7973
 972 771-0958 Telephone
 972 771-5963 Facsimile
 CPSC Hotline 1-800-638-2772
 Website www.cpsc.gov

From: Topka, Tanya L.
Sent: Tuesday, August 15, 2006 8:54 AM
To: Bradford, G. Brent
 Karen, Michael I.

5

SunL

certification transp. status age 6-10 (12+ model)
violation

no front brakes, no parking brake
front suspension has less than 2" of travel

no flag pole bracket

has headlight

cannot carry owners manual on ATV
no VIN #

ATV not delivered w/ speed limited as it should be
failed brake (service) perform. requirements

no vehicle load capacity label on ATV

no safety info on website

no passenger or tire pressure label

no hang tags, safety video, training

**U.S. Consumer Product Safety Commission
SAMPLE COLLECTION REPORT**

1. Sample Flag HOLD IN WAREHOUSE ATTN: TANYA TOPKA		2. Date Collected 7/18/06	3. Sample Type and Number: 06-840-7240 <input checked="" type="radio"/> Physical <input type="radio"/> Documentary	
4a. Product Name 4 WHEELED ATV		4b Model SLA-90MR	4c NEISS 3286	5. Assignment Number 060707CRC1127
6. Complete for Import Samples Port of Entry: _____ Country of Origin: _____ Entry No. and Date: _____ Customs Contact: _____			7. MIS 32402	8. Hours Activity _____ Travel _____
			9a Home RO CFIW	9b Collecting RO CFIW
10. Sample Cost \$431.57		11. Invoice Value of Lot \$242,400.00		12. Size of Lot 808
				Units unt
13. Manufacturer/Importer # SUN186 SUNL GROUP INC. 11410 MATHIS AVE FARMERS BRANCH, TX 75236		14. Shipper/Foreign Manufacturer		15. Dealer/Import Broker # SUN186 SUNL GROUP INC. 11410 MATHIS AVE FARMERS BRANCH, TX 75236
16. Supporting documents attached: Invoice No. and Date: <u>SEE REMARKS</u> Shipping Record and Date: <u>SEE REMARKS</u> Affidavit Signer's name, title and date: <u>JEFF BOUDREAUX, GENERAL MANAGER, 7/18/06</u>				
17. Product Identification: Product is identified as a four-wheeled all terrain vehicle pink in color and packaged in its original shipping carton. Shipping carton labeled in part: **"G. W. 91 KGS N.W. 68 KGS**MADE IN				
18. Reason for collection/analysis needed: <input type="radio"/> FHSA <input checked="" type="radio"/> CPSA <input type="radio"/> FFA <input type="radio"/> PPPA <input type="radio"/> RSA Test with voluntary standard for ATVs				
19. Summary of Field Screening: None				
20. Sample size/Method of Collection: Sample consists of one unit selected at random from a lot of 809 from warehouse of firm. Sample will be identified as in item 21 and was officially sealed in its original shipping carton as in item 22.				
21. Identification on sample: " 06-840-7240 SUB 1 GBB 7/18/06 "			22. Identification on seal and date: "06-840-7240 G. Brent Bradford 7/18/06 "	
23a. Sample delivered to: FREIGHT OLD DOMINION 7523			23b Date 7/18/06	24. Report/Record Sent to: CFIW
25. Laboratory/Office: LSE _____ LSM _____ CRC _____ SIU _____ LSC _____ LS _____ CLD _____ SSF <u>X</u> Other _____				
26. Remarks: Sample collected and prepared for shipment to Sample Storage Facility with instructions to hold for Tanya Topka, CRC. Notice in Inspection, Receipt for Samples, Affidavit and photographs				
27. Related Samples: none				AFSL: N
28a Collector's name/title: G. Brent Bradford Sr. Investigator			28b Collector's signature/date: 7/18/06	
29a Reviewer's name/title: Sidney C. Englander Supervisor			29b Reviewer's signature/date: 7/18/06	

Information for Sample No J6-840-7240

AFSL stickers on all cases? N

Lot Number:

Sticker Numbers:

CONTINUATION OF NARRATIVES FOR SAMPLE #

06-840-7240

PRODUCT IDENTIFICATION

CHINA**ATV-90MR-NL**".

METHOD OF COLLECTION

Sample prepared for shipment at dealer firm's warehouse and shipped by the dealer firm to the Sample Storage Facility with instructions to be held for Tanya Topka, CRC. Sample shrink-wrapped by dealer firm prior to shipment. See remarks.

REMARKS

attached. Sample being shipped by firm where sample collected and the sample cost includes shipping and handling. The invoice for the sample purchase and shipping B/L also attached to this report. Original documents including the C/R, CPSC 165 and sub 1 bar code will be mailed to Tanya Topka, CRC. Sub 1 bar code needs to be attached to the sample once removed from its shipping carton. Sample and shipping paid for with CPSC purchase credit card. Shipping tracking number is 77703732436. Firm had no test records or reports for this ATV.

R

L . Consumer Product Safety Commissio..
ASSIGNMENT REPORT - Non IDI

Assign No 060707CRC1127	MIS Code 32402	Status Open	Assign Type Sample Collection	Region CFIW
Investigator	Supervisor Frank J. Nava	Firm SUNL GROUP INC. 11410 MATHIS AVE FARMERS BRANCH, TX 75236	Program ID	

Assign Date 07/07/06	Target Date 08/06/06	Zip 75234	Product Description ALL TERRAIN VEHICLES (FOU
Revised Target Date	Complete Date	Document Number	

Remarks

collected have documents

Full 300 is completed report

Assignment

Headquarters contact: Tanya Topka 301-504-7594

Please go on-site and collect one ATV. It should be a randomly selected SunL SLA-90cc ATV. Please go in announced and collect one sample. Please purchase the sample at firm's cost if possible and have it shipped to SSF ATTN: Tanya Topka. Please call me the day it is shipped and let me know when it is expected to arrive. If the firm has test reports on this particular model please collect if possible and mail directly to me.

If you are not able to collect this model at the firm listed please purchase either online (alt-trans.com has this product with photos if you need to see it) or in a store.

Sunl Group (Dallas), Inc.

sunl.com
Sales@sunl.com
11410 Mathis Ave., Farmers Branch, TX 75234
Tel: (972) 243-4555 Fax: (972) 243-0553

06-840-7240
7/18/06 GBB

2477

INVOICE

Invoice No.: 2477
Date: 7/18/2006

Customer ID: 0015884

Print By: AMANDA

Page 1 of 1

Sold To

Ship To

Ship Date: 7/18/2006

Attn:

US CONSUMER PRODUCT
2059 clem rd. ext
ROCKWELL, TX 75087

Attn:

US CONSUMER PRODUCT
10901 DARNESTOWN RD.
GAITHERBURG, MD 20878

Tel: (000) 000-0000

Fax: (000) 000-0000

S/O No.	S/O Date	P/O No.	Sales Rep.	Ship Via	F.O.B.	Terms	Due Date
2554	7/18/2006		JB	ODFL	DALLAS		7/18/2006

Order Qty	Ship Qty	B.O. Qty	Item No.	Description	Unit Price	Ext. Amount
1.00	1.00		SLA-90MR		299.00	299.00

COPY

Notes:

Sales Amount: 299.00

Tax %: 0.00

Shipping & Handling: 132.57

Total Amount: 431.57

Payment: 431.57

Balance Due: 0.00

Paid by Credit Card

Important Information to read.

The Sunl Group Inc. is engaged in selling product to dealers only, as a condition of this transaction you as a dealers are responsible for the following:

1. Meeting all federal, state and local DOT, MVC, and Tax laws.
2. To assemble and perform complete (PDI) per-delivery inspections to assure safety and proper operation to the final consumer.
3. Maintain a full service parts and service operations.

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06-840-7240

~~718106~~ GBB

AFFIDAVIT	Sample No. <u>06-840-7240</u>
------------------	-------------------------------

State Of <u>TEXAS</u>	County Of <u>DALLAS</u>
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Before me, G. Brent Bradford, a duly authorized employee of the Consumer Product Safety Commission, appropriately designated by the Chairman of said Commission pursuant to provisions of the Consumer Product Safety Act (sec. 27 (b) (2), 86 Stat. 1228; 15 U.S.C. 2076 (b) (2), to administer or take oaths, affirmations, and affidavits, personally appeared

JEFF BOUDREUX in the county and State aforesaid, who, being first duly sworn, deposes and says: I AM GENERAL MANAGER OF SUNL GROUP, INC., 11410 MATHS AVE., FARMERS BRANCH, TEXAS 75234 AND IN THIS POSITION I HAVE KNOWLEDGE OF ATV PRODUCTS IMPORTED, WAREHOUSED AND DISTRIBUTED BY THIS FIRM.

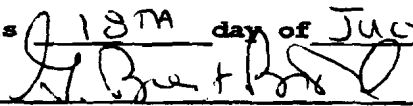
ON JULY 18, 2006 CPSC INVESTIGATOR G. BRENT BRADFORD COLLECTED THE FOLLOWING ATV SAMPLE FROM THIS FIRM:

ONE (1) RZR-WHEELHO ATV MODEL SLA-90KA
 THIS SAMPLED ATV WAS SHIPPED TO THE CPSC WAREHOUSE AND THE FOLLOWING SHIPPING RECORDS COVER THIS SHIPMENT:
 SUNL GROUP, INC INVOICE # 2477 DATED 7/18/06
 OLD DOMINION FREIGHT LINE, INC. BILL 77703732476 DATED 7/18/2006

THE SAMPLE COST OF THIS ATV INCLUDING SHIPPING & HANDLING WAS PAID BY MR. BRADFORD. THE TOTAL COST WAS \$431.57.

Affiant's Signature & Title


Firm (Name and address, include zip code)
 SUNL GROUP, INC.
 11410 MATHS AVE
 FARMERS BRANCH, TEXAS
 75234

Subscribed and sworn to before me at FARMERS BRANCH, TEXAS
 (City and State)
 this 18TH day of JULY, 2006.

 (Employee's Signature)

EMPLOYEE OF THE CONSUMER PRODUCT SAFETY COMMISSION ACTING IN ACCORDANCE WITH AUTHORITY GRANTED IN THE ABOVE STATED DECLARATION.

U.S. CONSUMER PRODUCT SAFETY COMMISSION

1. AREA OFFICE ADDRESS

POST OFFICE BOX 117
ROCKWELL, TEXAS 75087-0117

2. NAME OF INDIVIDUAL

JOE BARNOR

3. TITLE OF INDIVIDUAL

General Manager

4. DATE

7/18/06

5. FIRM NAME

SWUL GROUP, INC.

6. SAMPLE NUMBER

06-840-7240

7. NUMBER AND STREET

11410 MATIAS AVE

8. CITY AND STATE (Include Zip Code)

FARMERS BRANCH TEXAS 75224

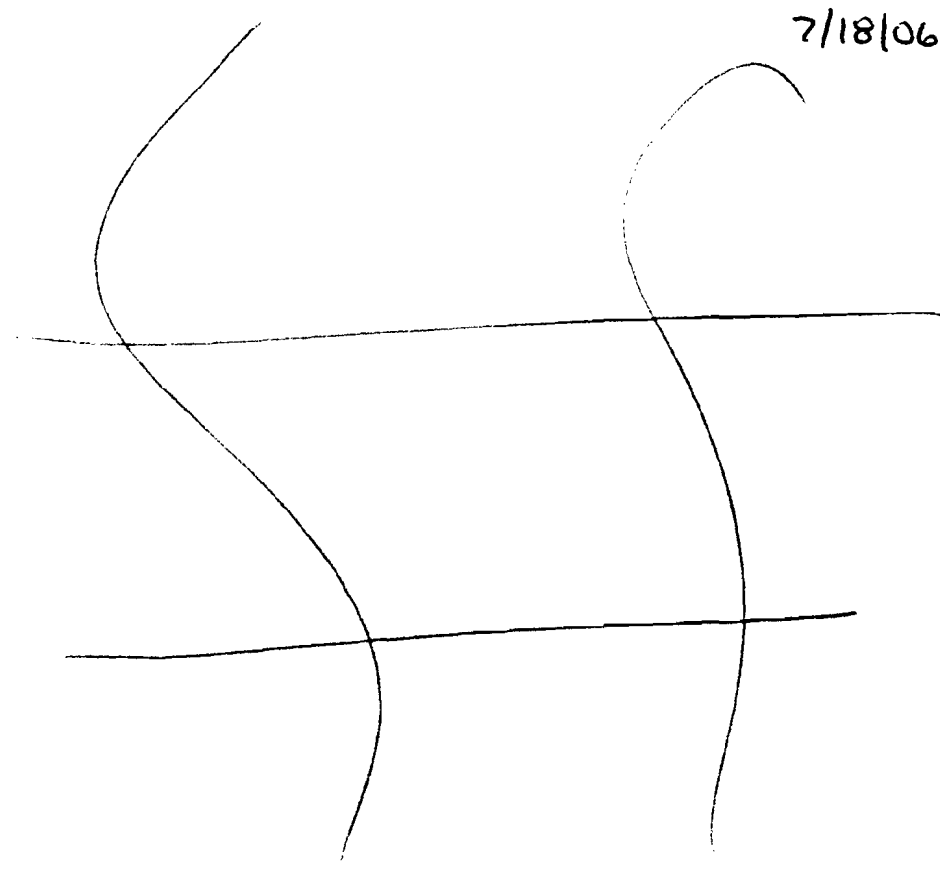
9. SAMPLES COLLECTED (Describe fully. List lot, serial, model numbers and other positive identification)

The following samples were collected by the Consumer Product Safety Commission pursuant to Section 27(f) of the Consumer Product Safety Act (15 U.S.C. 2076(f)) and/or Section 11(b) of the Federal Hazardous Substances Act (15 U.S.C. 1270(b)) and/or Sections 5(c) and (d) of the Flammable Fabrics Act (15 U.S.C. 1194(c) and (d)) and/or Section 704(c) of the Federal Food Drug and Cosmetic Act (21 U.S.C. 374(c)) [Authority for sample collections made in connection with the Poison Prevention Packaging Act of 1970 (15 U.S.C. 1471 et seq.)], and receipt for said samples is hereby acknowledged. Sections cited are quoted on the reverse side of this form.

ONE (1) FOUR-WHEELER ATV MODEL 50A-50MR

06-840-7240

7/18/06 GBB



SAMPLES COLLECTED FROM SWUL GROUP, INC.

7/18/06

10. NUMBER OF SAMPLES

1

11. SAMPLES WERE

PURCHASED

BORROWED (To be returned)

12. COLLECTOR

Joe Barnor

Signature

7/18/06

12

U.S. CONSUMER PRODUCT SAFETY COMMISSION
NOTICE OF INSPECTION

1. DATE 7/18/06	3. FROM (Area Office and Address) 2039 CLEM RD. EXT ROCKWALL, TEXAS
2. TIME 9:30 A.M. _____ P.M.	

A. NAME AND TITLE OF INDIVIDUAL JEFF BOURDEAUX - GENERAL MANAGER
B. FIRM NAME SUNL GROUP, INC
4. TO C. NUMBER AND STREET ADDRESS 11410 MATHIS AVE
D. CITY, STATE AND ZIP CODE FARMERS BRANCH, TEXAS 75236

Notice of Inspection is hereby given pursuant to:

- Flammable Fabrics Act (15 U.S.C. 1191 *et seq.*);
- Federal Trade Commission Act (15 U.S.C. 41 *et seq.*);
- Sections 16, 19 and 27 of the Consumer Product Safety Act (15 U.S.C. 2065, 2068 and 2076)
- Section 704(a) of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 374(a)) [Authority for inspections in connection with the Poison Prevention Packaging Act of 1970 (15 U.S.C. 1471 *et seq.*)] and/or
- Section 11(b) of the Federal Hazardous Substances Act as Amended (15 U.S.C. 1270(b)).

Refer to the back of this form for a discussion of inspectional authority and for pertinent statutory language.

B. PURPOSES OF INSPECTION AND NATURE OF INFORMATION TO BE OBTAINED AND/OR COPIED.

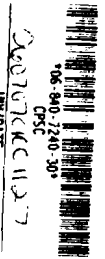
The purpose of this inspection is to obtain information; to review and obtain copies of items including but not limited to records, reports, books, documents; and labeling; and to obtain samples, in order to enforce or determine compliance with the Acts administered by the Consumer Product Safety Commission.

C. FREEDOM OF INFORMATION REQUIREMENTS

Those items whose information is requested should state whether any of the information submitted is believed to contain or relate to a trade secret or other matter which should be considered by the Commission to be confidential and whether any of the information is believed to be entitled to exemption from disclosure by the Commission under the provisions of the Freedom of Information Act (15 U.S.C. 552). Any exemption asserting confidentiality of information requested in this document may request the exemption of the information from disclosure must be made in accordance with the Commission's Freedom of Information Act regulations, 16 CFR Part 1015.

7. SIGNATURE (Authorized CPSC Official)
G. Brent [Signature]





Sun 1 Group QO MR-NL ATN

pink in color

Made in China

14

Cam w/o this on

has tail lights

one headlight (may be del)

ketten cord is about 3ft.

2 keys

left front almost flat right front
also H axle

no tire assembly instruction how to figure out

no carbon pins

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

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300

CPSC Hotline 1-800-638-2772

fire pressure gauge ES

front left not reading right 13 PSI

back left 18 right 22

room 3.5
4.3

RA



110ST/90ST/70ST/50ST

06-840-7240
7/18/06 686

FREIGHT CHARGES ARE PREPAID ON THIS BILL OF LADING UNLESS MARKED COLLECT



OLD DOMINION FREIGHT LINE, INC.

INTERNET STRAIGHT BILL OF LADING
ORIGINAL - NOT NEGOTIABLE



77703732436

FREIGHT CHARGES:
Prepaid

DATE:
07/18/2006

PO#: - - - - -

www.ODFL.com

SHIPPER (FROM): SUNL GROUP INC 11410 MATHIS AVE FARMERS BRANCH, TX 75234 UNITED STATES 972-243-4555 ANTHONY		CONSIGNEE (TO): SHAPLE STORAGE FACILITY US CPSC 10901 DARNESTOWN RD. GAITHERS BLURG, MD 20878 UNITED STATES - TANYA TOPKA		COD	Amount: COD Fee:
BILL TO (PAYOR): SUNL GROUP INC 11410 MATHIS AVE FARMERS BRANCH, TX 75234 UNITED STATES 972-243-4555 ANTHONY		REMIT TO (COD):		Subject to section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges. _____ (Signature of Consignor)	

Pieces	HM	Description	Type	NMFC No.	Class	Weight (lbs)
01		ATV	CRT		70	215

ATTENTION:
 TO AVOID BATTERY POWER - RELEASING.
 TAKE OUT THE FUSE DURING TRANSPORTATION
 PLEASE INSTALL THE FUSE UNDER THE SEAT
 WHEN USING.

Special Instructions:

HAZARDOUS MATERIALS EMERGENCY CONTACT: -

Total Shipping Units: 1 - Crates

Total Weight: 215

Carrier Liability: Shipments valued at more than \$25.00 per pound are of extraordinary value. Carrier's maximum liability is \$25.00 per pound per package subject to \$100,000.00 maximum total liability per shipment. The agreed value on household goods, used machinery, or personal effects does not exceed ten cents per pound per article, unless otherwise specified.	*THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION AND THE NATIONAL MOTOR FREIGHT CLASSIFICATION AS SHOWN IN THE NMFC 100 SERIES.*				
NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ per _____.	TALLY RECORD				
Shipper hereby certifies that he understands that all transportation by ODFL shall be subject to the terms and conditions of the Bill of Lading contracts shown in the NMFC 100 series, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.					TOTAL
SHIPPER: SUNL GROUP INC	DATE:	HUI RECEIVED:		TRAILER NO.:	
AUTHORIZED SIGNATURE: (Shipper)	CARRIER: OLD DOMINION FREIGHT LINE, INC. AUTHORIZED SIGNATURE: (Driver)				

ALL-terrain VEHICLE



OWNER'S MANUAL 50/70/90CC

Sample 06-840-7240 Sunl Group, Inc. SLA-90MR (90cc) ATV 060707CRC1127
Pink in color VIN not identified on shipping materials. No model year associated.

ATV shipped in crate by Old Dominion shipping. Purchased on 7/18/06. Shipped on same date.

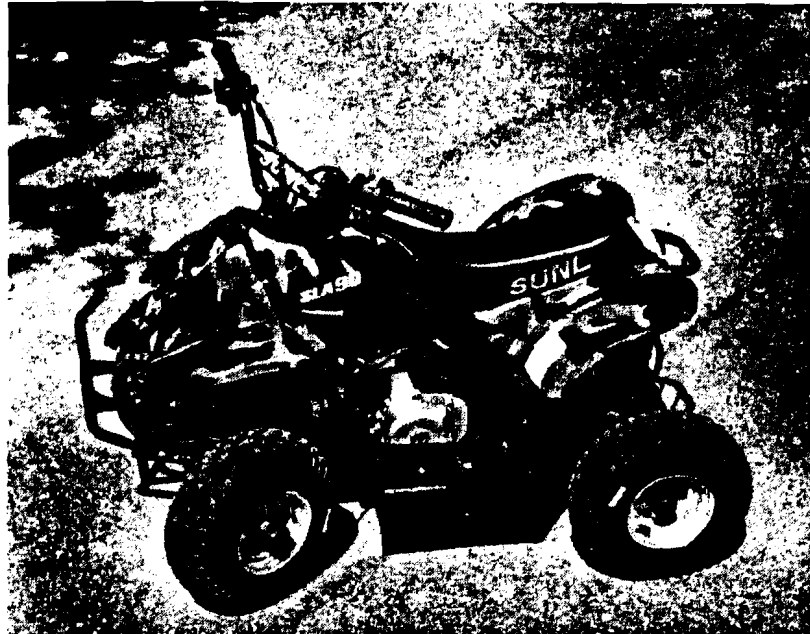
ATV came with: Owner's Manual for 50/70/90cc ATVs (there were no assembly instructions and the owner's manual does not cover assembly), parts catalog for 110ST/90ST/70ST/50ST, and sticker on shrink wrap of ATV seat discussing battery disconnect for shipping,

The ATV was shipped without any of the four tires on the ATV and key zip tied to handlebar assembly. The front brush grill, handlebar assembly, and battery uninstalled. The battery came in a box in two parts. There were no instructions for set up so CO Topka used previous knowledge to install loose parts. All parts installed easily and without issue. The ATV does not appear to be shipped with speed limiting screw set to lowest speed.

The firm did not have any test reports or certifications to the standard available during the visit. The ATV was collected from the firm's warehouse. The ATV is Made in China.

Compliance examined the crate on 8/2/06

Evaluation Of The SunL SLA-90 CC ATV



1. Introduction

Marchica & Deppa, LLC (M&D) tested a SunL SLA-90 cc four-wheeled ATV to the requirements of the American National Standard for Four Wheel All-Terrain Vehicles – Equipment, Configuration, and Performance Requirements (ANSI/SVIA-1-2001). M&D tested the subject ATV to the appropriate requirements of ANSI/SVIA-1-2001. M&D also assessed the SunL SLA-90 cc ATV for conformance with agreements in the Action Plans.

2. Purchasing the SunL SLA-90 cc ATV

The website of Alternative Transportation (www.alt-trans.com) was identified for the purchase of this ATV. M&D called Alternative Transportation and ordered the ATV for \$674.99. The ATV was delivered via truck freight to M&D by R+L Carriers. The ATV required assembly of the handlebars, wheels and the front safety bar. The battery charger that came with the ATV was broken into pieces.

After receipt of the ATV, M&D measured the air pressure in each tire. The tire air pressure measured was the bead seating pressure (24 psi) which far exceeds the recommended tire air pressure of 4 psi. Bead seating pressure is a temporary high inflation pressure used in mounting the tire on the rim.

3. Testing to ANSI/SVIA-1-2001 (the Standard)

The owner's manual for the SunL SLA-90 cc ATV does not state the minimum age requirement to operate the ATV. However, the Alternative Transportation website states the SunL SLA-90 cc ATV is "Recommended for ages 6-10 . . ."

Section 3 of the Standard classifies ATVs as a Category Y (Youth Model), if they are intended for recreational off-road use under adult supervision by operators under age 16. The standard further categorizes youth models as Category Y-12 ATVs if intended for use by children age 12 and older, or Category Y-6 if intended for use by children age 6 and older.

Based upon the Alternative Transportation website's representation that the SunL SLA-90 cc is recommended for use by children ages 6-10, this ATV is classified by the Standard as a Y-6 ATV.

(Note that based on agreements between the major ATV distributors and the CPSC, a 90 cc ATV is intended for use by children age 12 and older and is considered a Y-12 ATV, and that Y-6 ATVs intended for use by children over age 6 are limited to 50 cc engines.)

The ATV was tested to the appropriate requirements of the Standard as discussed below. Note that results are given as **Pass**, **Fail**, or **Not Applicable**. Additional information is provided as appropriate.

Section 4. Vehicle Equipment and Configuration.

Section 4.1 Service Brakes. Fail.

The ATV does not have independently-operated front and rear brakes.

Section 4.1.1 Independently Operated Front Brakes. Fail.

The ATV does not have front brakes.

Section 4.1.2 Independently Operated Rear Brakes. Pass.

Section 4.1.3 Simultaneously Operated Front and Rear Brakes. Not Applicable.

Section 4.2 Parking Brake/Parking Mechanism. Fail.

The ATV does have a parking brake. It does not meet the requirements of Section 8.3, Performance Requirements.

Section 4.3 Mechanical Suspension. Fail.

The ATV has a front mechanical suspension that provides less than two inches of travel and a rear mechanical suspension that provides at least two inches of travel.

Section 4.4 Engine Stop Switch.

Section 4.4.1 Operation. Pass.

Section 4.4.2 Color of Device. Pass.

Section 4.5 Manual Clutch Control. **Not Applicable.**

Section 4.6 Additional Clutch Control for Utility ATVs. **Not Applicable.**

Section 4.7 Throttle Control.

Section 4.7.1 Operation. **Pass.**

Section 4.8 Drivetrain Controls. **Not Applicable.**

Section 4.9 Neutral Indicator. **Not Applicable.**

Section 4.10 Reverse Indicator. **Not Applicable.**

Section 4.11 Electric Start Interlock. **Pass.**

Section 4.12 Carry Bar. **Fail.**

The ATV went past 90 degrees when it was standing on its rear wheels and the carry bar
(See Figure 1).

Section 4.13 Flag Pole Bracket. **Fail.**

The ATV does not have a flag pole bracket.

Section 4.14 Manual Fuel-Shutoff Control. **Not Applicable.**

Section 4.15 Handlebars. **Pass.**

Section 4.16 Operator Foot Environment. **Pass.**

Section 4.17 Lighting Equipment.

Section 4.17.3 Requirements for Category Y Vehicles. **Fail.**

The ATV has a headlight (See Figure 2) and a tail light. Category Y vehicles shall not have a headlamp or a tail lamp.

Section 4.18 Spark Arrestor. **Fail.**

There is no marking.

Section 4.19 Tire Marking. **Fail.**

(9) Inflation Pressure. **Pass.**

(10) Bead Seating Pressure. **Pass.**

(11) Other Markings. (a) **Pass**; (b) **Fail**; (c) **Pass**; (d) **Fail**; (e) **Pass**.

There is no three-digit week and year of manufacture on one tire sidewall.

"Tubeless" was marked on only one of the four tires.

(12) Letter Sizes. **Pass.**

Section 4.20 Tire Pressure Gauge. Fail.

There was no tire pressure gauge provided with the ATV. The ATV does not have a means of carrying the tire pressure gauge.

Section 4.21 Security. Pass.

Section 4.22 Owner's Manual. Fail.

The ATV does not have a means of carrying the owner's manual that protects it from destructive elements while allowing reasonable access.

Section 4.23 Vehicle (ATV) Identification Number. Fail.

The ATV does not have a Vehicle Identification Number.

Section 6. Youth ATV Requirements.

Section 6.1 Speed Limiting Devices. Fail.

Section 6.1.1 Tools Must be Needed to Adjust or Remove Device. **Pass.**

Section 6.1.2 Maximum Speeds. **Fail.**

Test results were 25.4 mph; 28.0 mph; 26.0 mph; and 27.8 mph (See Figure 3). The arithmetic average was 26.8 mph.

Section 6.1.3 Delivery of ATV from Manufacturer. **Fail.**

The ATV was not delivered with the speed limiting device adjusted to limit maximum speed to 10 mph or less.

Section 6.2 Maximum Unrestricted Speed Capability. Fail.

Because this ATV is intended by the distributor for use by children from age 6-10, it fails this requirement. If the distributor were in conformance with the Action Plans, and limited this 90 cc ATV to use by children over age 12, it would pass this requirement

Section 7. Service Brake Performance.

Section 7.3 Performance Requirements. Fail.

The maximum speed determined in Section 6.1.2 was 26.8 mph. Therefore, the braking test speed was 20 mph. (The braking test speed of 20 mph is the multiple of 5 mph between 18.8 mph and 22.8 mph).

Section 7.3.2 applies to an ATV with a maximum speed capability greater than 18 mph. In order to have a braking deceleration of 0.6g or greater, the stopping distance is 22 feet or less.

Four tests were conducted with the following stopping distances: 37'0"; 43'4"; 47'2"; and 52'6" (See Figure 4). As all the stopping distances exceed the requirement, this ATV fails the service brake performance requirements.

Section 8. Parking Brake/Mechanism Performance.

Section 8.3 Performance Requirements. Fail.

There was no information on the vehicle load capacity. Based on weight-for-age percentiles for heavy 10 and 11 year old boys, a range of 100 pounds to 120 pounds was selected for the test. (See <http://www.cdc.gov/growthcharts>). The parking brake failed with a 110 pound load in the downhill direction (See Figure 5) and with a 120 pound load in the uphill direction.

Section 9. Pitch Stability.

Section 9.3 Performance Requirement. Pass.

The pitch stability coefficient calculated was 1.51. This is greater than the requirement that the pitch stability coefficient be at least 1.0 (See Figure 6).

4. Conformance to the CPSC Action Plans

Age Recommendations

The Alternative Transportation website states the SunL SLA-90 cc ATV is "Recommended for ages 6-10 . . ." The standard categorizes this youth model ATV as a Category Y-6 ATV. However, based on the Action Plans, a 90 cc ATV is intended for use by children age 12 and older and is considered a Y-12 ATV.

Dealer Monitoring

M&D found no information that the SunL Group (www.sunl.com) and/or Alternative Transportation (www.alt-trans.com) maintain a dealer monitoring program to obtain dealer compliance with the age recommendations.

Information/Education

No safety information was found on the SunL Group or the Alternative Transportation websites.

ATV Labels

The SunL SLA-90 cc ATV has general (Figure 7) and age (Figure 8) labels. It does not have passenger or tire labels.



Owner's Manual

The SunL SLA-90 cc ATV owner's manual is in English (29 pages). M&D is not aware that CPSC has reviewed the owner's manual. The owner's manual includes almost none of the informational content requirements.

Advertising

No advertising was found on the SunL Group or Alternative Transportation websites that depicted the use of ATVs.

Hang Tags

The ATV had no hang tags that provided safety messages.

Safety Alerts

No ATV Safety Alert was provided.

ATV Safety Video

No ATV Safety Video was provided.

Training

Free hands-on training was not offered to the purchaser and qualifying members of the immediate family. No incentives were offered.

ATV Hotline

M&D is not aware that SunL Group or Alternative Transportation help fund the toll-free ATV hotline administered by the Specialty Vehicle Institute of America.

5. Other Observations

Several parts (including the chain guard and ignition switch module) fell off or loosened during testing of the ATV.

FIGURES

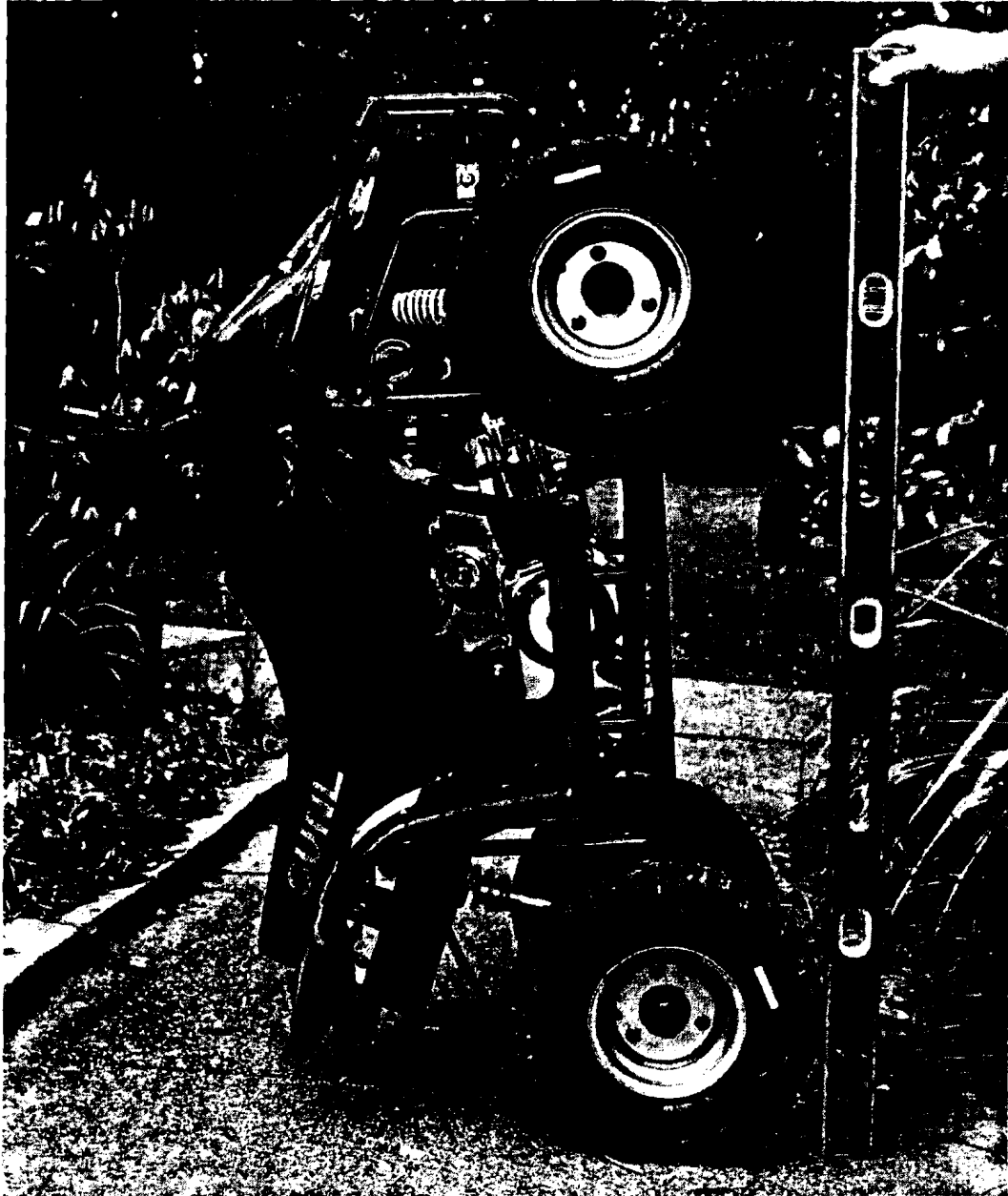


Figure 1. The ATV went past 90 degrees when it was standing on its rear wheels and the carry bar.

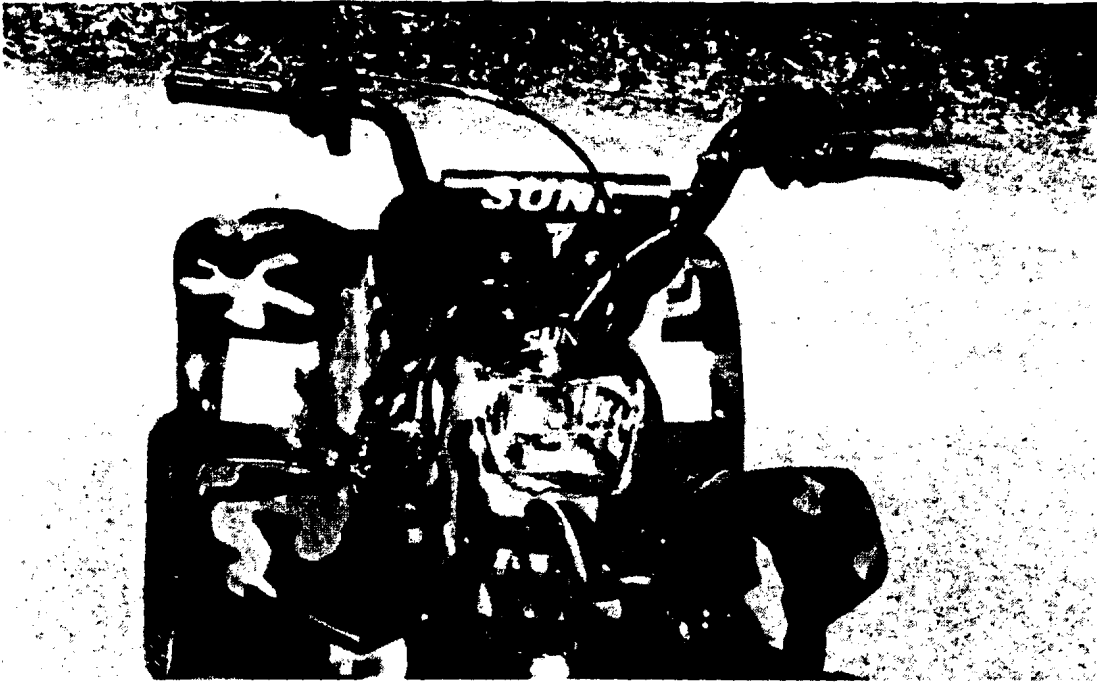


Figure 2. The ATV has a headlight.



Figure 3. Maximum Speed Test



Figure 4. Brake Test Measurement

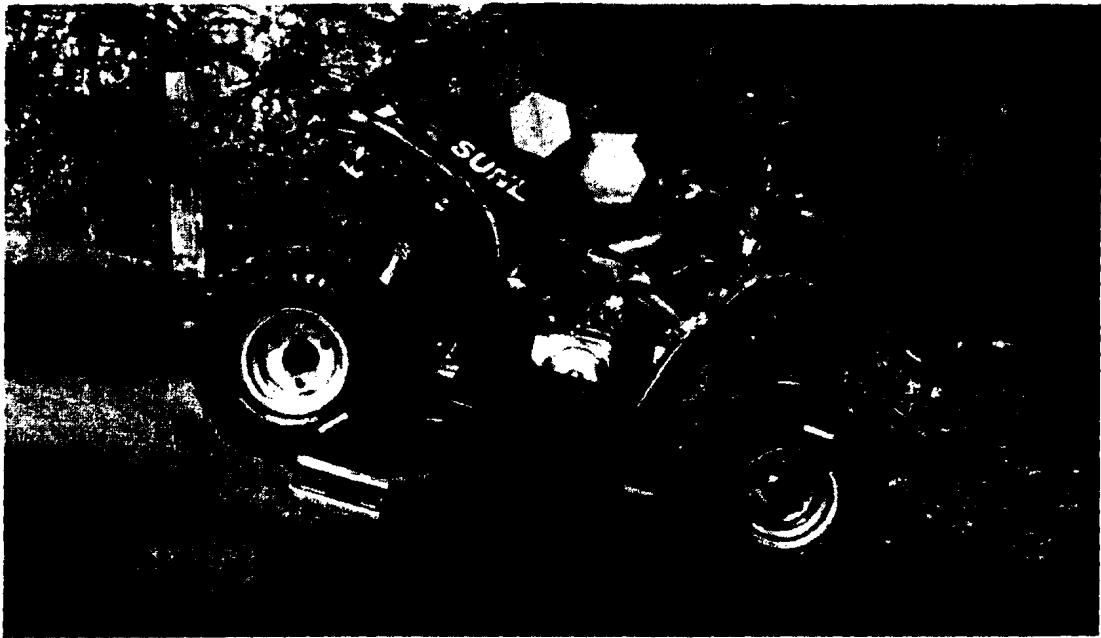


Figure 5. Parking Brake Test



Figure 6. Balance Point Measurement for the Pitch Stability Calculation

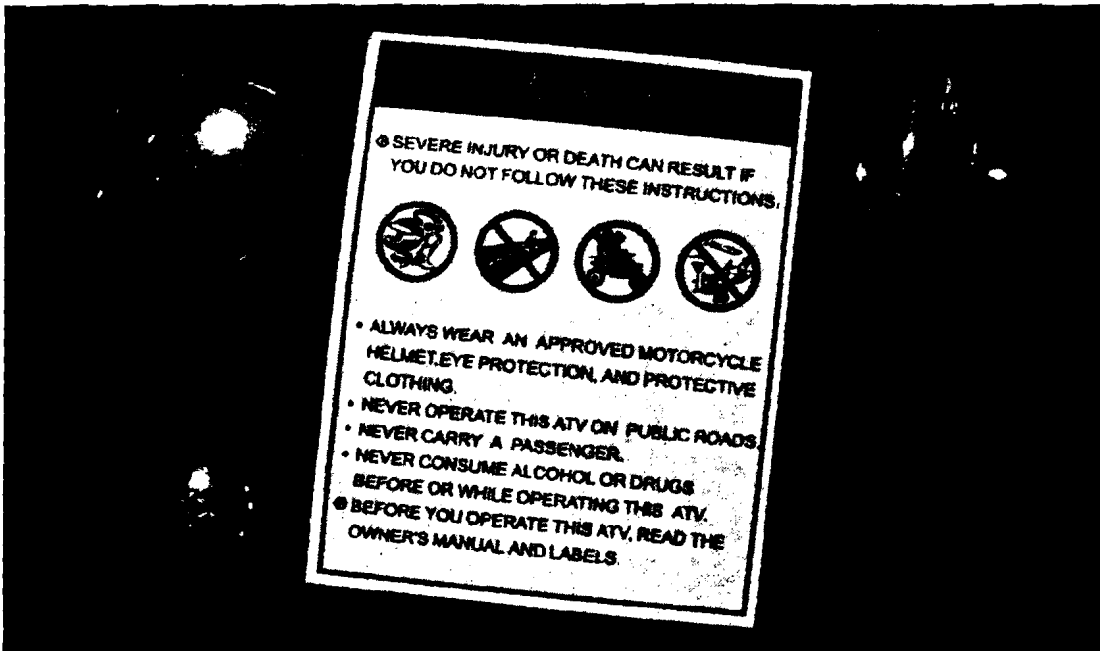


Figure 7. General Warning Label

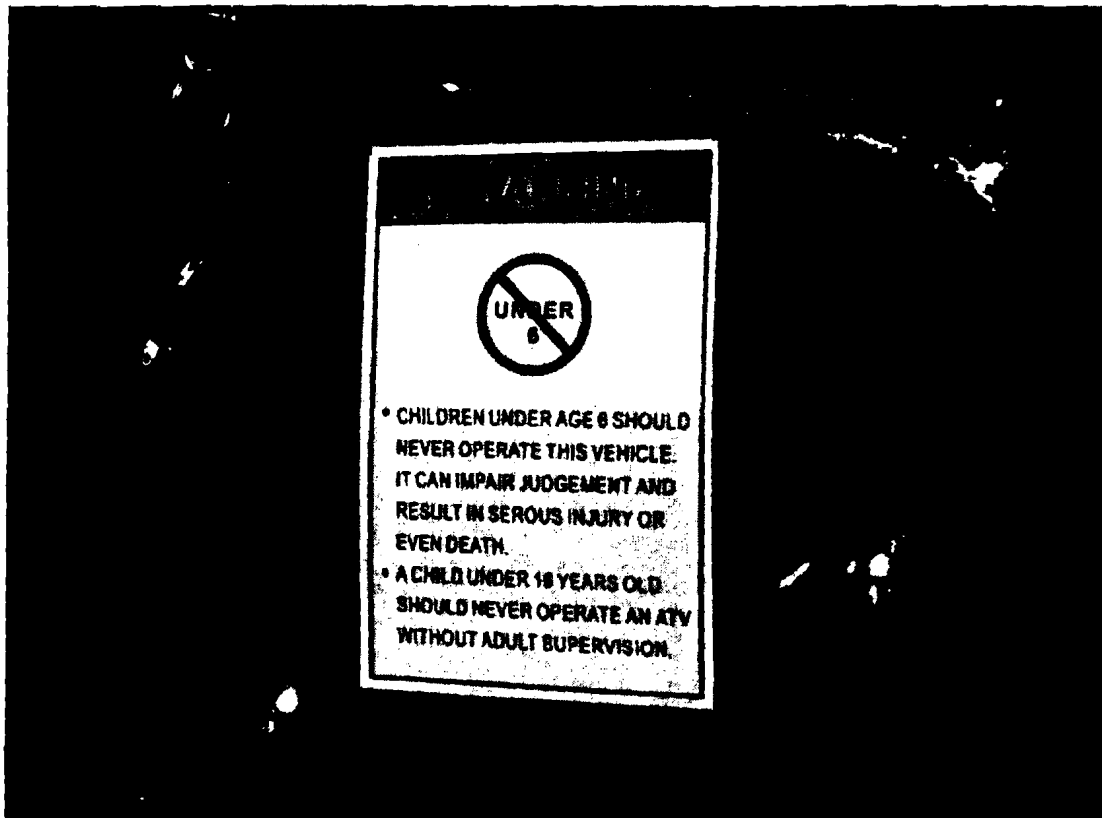


Figure 8. Age Warning Label

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US CONSUMER PRODUCT SAFETY COMMISSION PRODUCT SAFETY ASSESSMENT REPORT DRAFT – FOR OFFICIAL USE ONLY - DRAFT	PSA No.	0695.06	
	Case No.	PI060047, PI060048, PI060049, PI060052	
	Requested By	Tanya Topka, (301) 504-7594	
	Regional Office	CRC	
	Sample No.	06-840-6430, 06-840-7240, 06-840-6290, 06-840-6803, 06-840-7265, 06-810-2113, 06-810-2455,	
	CPSC Seal		
	IDI No.		
Product:	ATV	Firm:	SUNL group, Baja Motorsports, Kazuma, Ohalee, Lifan, Xtereme Motor, Long Chang, Yamaha, Polaris
Request:	Please test all ATVs to the voluntary standard. See attached file for items to be included in the testing		
Potential Hazard:	Mechanical hazard		
Prepared by		Reviewed by	
Mike Karen Mechanical Engineer		Mark Kumagai Mechanical Engineer	
Extension	7576		
Date	November 9, 2006	Date	November 15, 2006

BACKGROUND: The PSA technical evaluation was conducted on 9 different brands of all terrain vehicles (ATVs) shown in figures 1 and 2. Figure 1 shows the sample ATV's having the smallest frames and Figure 2 shows the sample ATVs having the larger frames. For comparison, one of the smaller ATVs is shown in the foreground of figure 2. The Polaris, Yamaha and Longchang ATVs were purchased from dealerships and the remaining ATVs were purchased directly from company websites with no retailer involved in the transaction.

The purpose of this evaluation was to determine if the ATV samples were in compliance with the ANSI/SVIA voluntary standard (VS) of February 15, 2001, for four-wheeled ATVs. Due to testing limitations, the evaluation described herein addresses only those ATV requirements that could be evaluated without starting up or running/riding the ATVs.

Discussion: ES staff received 9 Sample ATV's in the condition that was representative of how the ATVs would be received by consumers. Although not directly relevant to any requirements in the VS, it is worthwhile to note that those ATVs which were purchased directly from websites were received in an unassembled condition compared with those ATVs sold through dealerships or retailers. This fact is significant because the unassembled ATVs were provided with assembly hardware, but with little or no



Figure 1: Sample ATVs with smaller frames



Figure 2: Sample ATVs with larger frames (small ATV shown in foreground for comparison)

guidance relative to assembly procedures and instructions. It is the opinion of the ESME and HF staff that the average consumer would have a difficult time properly assembling the ATVs, and that there is a reasonably good probability that critical components or bolts could mistakenly be left off or improperly assembled. Such oversights could lead to a loss of vehicle control during riding that could result in serious injury or death.

A summary of the ATV samples evaluated is shown in Table 1. ES staff evaluated the ATVs to determine their compliance with those sections of the VS that did not require vehicle start up. The relevant sections of the standard are listed in Table 2, along with a summary of how each ATV performed against the standard. "P" indicates that the ATV passed, or complied with the VS, "F" indicates that the ATV failed to meet the VS requirement, and "NA" indicates that a requirement did not apply to a particular ATV. A "?" indicates that the requirement could not be determined without starting up or riding the vehicle. Out of the nine samples evaluated, only two, the Yamaha Grizzly and the Polaris

Predator were in total compliance with the VS. The following paragraphs will discuss in depth the areas in which each ATV failed to comply with the VS.

Sample 06-840-7265/Lifan A12S 125ST ATV: This sample failed to meet the requirements of section 4.4 because, although it has an engine stop switch, the operator must hold the switch in the off position to stop the engine. The standard states that the switch shall not require the operator to hold it in the off position to stop the engine. It also failed to meet section 4.2 because a tire pressure gauge was not provided as is required by the standard. The sample failed to meet section 4.9 because, although it is a semi automatic transmission, it does not have a neutral indicator. It failed section 4.14 because it does not have a manual fuel shutoff. The sample failed to meet section 4.15 because there are bolts on the handlebar assembly that have edge radii less than 0.125 inches that may be contacted with a 6.5 inch diameter test probe. The ATV failed section 4.19 because it does not provide the date of manufacture on the side of the tire; all other required tire markings are present.

Sample 06-840-7240/SUNL SLA 90: This sample did not meet section 4.1 of the standard because it does not have front brakes. It failed to meet section 4.3 because the rear suspension only permits 1.5 inches of travel compared with the 2-inch travel requirement. It failed section 4.12 because the vehicle rotates in excess of 90 degrees before coming to rest on the carry bar. The sample failed section 4.13 because it does not have a flag pole bracket. The sample failed section 4.14 because it does not have a manual fuel shutoff. The sample failed section 4.15 because there are bolts on the handlebar assembly that have edge radii less than 0.125 inches that may be contacted with a 6.5 inch diameter test probe. The sample failed to meet section 4.20 because a tire pressure gauge was not provided with the ATV. The sample failed section 4.22 because there is no place to store the owner's manual on board the ATV.

Sample 06-840-6803/Kazuma Meerkat 50: This sample did not meet section 4.1 or 4.2 of the standard because it does not have front brakes and it does not have a parking brake. It fails to meet section 4.3 because the front suspension is solid and has no travel as compared with the 2-inch travel requirement in the standard. The sample failed to meet section 4.9 because, although it is a semi automatic transmission, it does not have a neutral indicator. It failed section 4.13 because the flag pole bracket does not meet the minimum ½ -inch hole size requirement. The ATV failed section 4.19 because it does not provide the date of manufacture on the side of the tire; all other required tire markings are present. The sample failed to meet section 4.20 because a tire pressure gauge was not provided with the ATV. The sample failed section 4.22 because there is no place to store the owner's manual on board the ATV.

Sample 06-840-6430/Baja Motor sports Baja 90: This sample did not meet section 4.13 because it does not have a flag pole bracket. The ATV failed section 4.19 because it does not provide the date of manufacture on the side of the tire; all other required tire markings are present. The sample failed to meet section 4.20 because a tire pressure gauge was not provided with the ATV. The sample failed section 4.22 because there is no place to store the owner's manual on board the ATV.




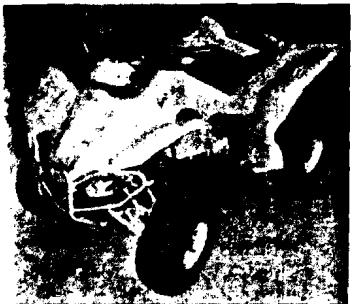
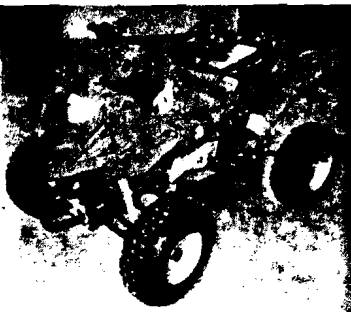
Sample 06-810-2455/Long Chang: This sample failed to meet the requirements of section 4.4 because, although it has an engine stop switch, the switch is black and the operator must hold the switch in the off position to stop the engine. The standard states that the switch must be red and shall not require the operator to hold it in the off position to stop the engine. The sample failed section 4.17 because it has functioning head and tail lamps which is in violation of the youth ATV requirement stating that category "Y" (youth) vehicles shall have neither. The ATV failed section 4.19 because it does not provide the date of manufacture on the side of the tire; all other required tire markings are present. The sample failed to meet section 4.20 because a tire pressure gauge was not provided with the ATV. The sample failed

section 4.22 because there is no place to store the owner's manual on board the ATV. It should also be noted that although there is no requirement for ground clearance, this sample appeared to have a minimal ground clearance between the rear disc rotor guard and the pavement (2 inches) as compared to the other ATV samples.

Sample 06-810-2113/Xtreme motor co. X-49: This sample did not meet section 4.1 of the standard because it does not have front brakes. It fails to meet section 4.3 because the front and rear suspensions only permit 1.5 and 1.375 inches respectively of free travel, compared with the 2-inch minimum travel requirement. This sample failed to meet the requirements of section 4.4 because, although it has an engine stop switch, the switch is black and the standard states that the switch must be red. It failed section 4.13 because the flag pole bracket does not meet the minimum ½ -inch hole size requirement. The sample failed section 4.15 because there are bolts on the handlebar assembly that have edge radii less than 0.125 inches that may be contacted with a 6.5 inch diameter test probe. The ATV failed section 4.19 because it does not provide the date of manufacture on the side of the tire; all other required tire markings are present. The sample failed to meet section 4.20 because a tire pressure gauge was not provided with the ATV. The sample failed section 4.22 because there is no place to store the owner's manual on board the ATV.

Sample 06-840-6290/Ohalee, Inc. Cruiser ATV-05: This sample did not meet section 4.1 of the standard because it does not have front brakes. It fails to meet section 4.3 because the front suspension is solid, not allowing any travel compared with the 2-inch travel requirement in the standard. It fails sections 4.13 because the flag pole bracket does not meet the minimum ½ -inch hole size requirement. The sample failed section 4.15 because there are bolts on the handlebar assembly that have edge radii less than 0.125 inches that may be contacted with a 6.5 inch diameter test probe. The ATV failed section 4.19 because it does not provide the date of manufacture on the side of the tire; all other required tire markings are present. The sample failed to meet section 4.20 because a tire pressure gauge was not provided with the ATV. The sample failed section 4.22 because there is no place to store the owner's manual on board the ATV.

Conclusions: Of the 9 ATV samples provided to ES, only the Polaris Predator and Yamaha Grizzly appeared to be in full compliance with the VS. The remaining samples were in compliance with most of the VS requirements, but each brand failed to meet certain specific VS requirements as shown in table 2. Except for Yamaha and Polaris, none of the ATV's provided a tire pressure gauge or adequate stowage space for the owner's manual. Five of the nine samples were either missing a flag pole bracket or provided a bracket that did not meet the minimum hole size requirement. Five of the nine samples failed to meet section 4.15 of the standard because of sharp-edged bolt heads protruding from handlebar assemblies. Aside from those already noted, there did not appear to be any trends or patterns relative to VS requirements not being met by ATV manufacturers.

SAMPLE NO.	MANUF/MODEL/ ENG. SIZE/AGE	NON-COMPLIANCE W/ VS
<p>06-840-7265</p> 	<p>Lifan/ A12S 125 ST</p> <p>Engine: 125 cc</p> <p>Ages: 16 min</p> <p>Max load: 220 lbs.</p>	<ul style="list-style-type: none"> • Section 4.4-engine stop switch • Section 4.9- neutral indicator • Section 4.15-handlebars • Section 4.19-tire markings • Section 4.20-tire pressure gauge • Section 4.22-owner's manual storage
<p>06-840-7240</p> 	<p>SUNL/ SLA 90</p> <p>Engine: 90 cc</p> <p>Ages: 16 min</p> <p>Max load: 188 lbs.</p>	<ul style="list-style-type: none"> • Section 4.1-service brakes • Section 4.3-mechanical suspension • Section 4.12-carry bar • Section 4.13-flag pole bracket • Section 4.14-manual fuel shutoff • Section 4.15-handlebars • Section 4.20-tire pressure gauge • Section 4.22-owner's manual storage
<p>06-840-6803</p> 	<p>Kazuma/ Meerkat 50-4A</p> <p>Engine: 49 CC</p> <p>Ages: 12 min</p> <p>Max load: 88 lbs.</p>	<ul style="list-style-type: none"> • Section 4.1-service brakes • Section 4.3-mechanical suspension • Section 4.9-neutral indicator • Section 4.13-flag pole bracket • Section 4.19-tire markings • Section 4.20-tire pressure gauge • Section 4.22-owner's manual storage
<p>06-840-6430</p> 	<p>Baja Motorsports/ Baja 90</p> <p>Engine: 90 CC</p> <p>Ages: 12 min</p> <p>Max load: 160 lbs.</p>	<ul style="list-style-type: none"> • Section 4.13-flag pole bracket • Section 4.15-handlebars • Section 4.20-tire pressure gauge • Section 4.22-owner's manual storage
<p>06-810-2455</p> 	<p>Long Chang</p> <p>Engine: 86 CC</p> <p>Ages: 12 min</p> <p>Max load:</p>	<ul style="list-style-type: none"> • Section 4.4-engine stop switch • Section 4.17-lighting equipment • Section 4.17-youth category ATVs • Section 4.19-tire markings • Section 4.20-tire pressure gauge • Section 4.22-owner's manual storage



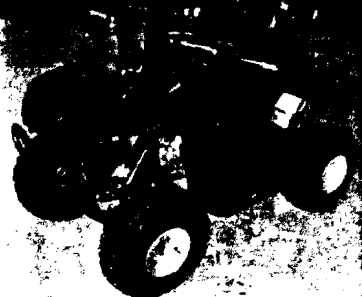

SAMPLE NO.	MANUF/MODEL/ ENG. SIZE/AGE	NON-COMPLIANCE W/ VS
<p>06-810-2113</p> 	<p>Xtreme Motor Co/ X-49</p> <p>Engine: 49.5 CC</p> <p>Ages: 6-12</p> <p>Max load: 100 lbs.</p>	<ul style="list-style-type: none"> • Section 4.1-service brakes • Section 4.3-mechanical suspension • Section 4.4-engine stop switch • Section 4.13-flag pole bracket • Section 4.15-handlebars • Section 4.20-tire pressure gauge • Section 4.22-owner's manual storage
<p>06-840-6290</p> 	<p>Ohalee, Inc./ Cruiser ATV-05</p> <p>Engine:72 cc</p> <p>Ages: 12 min</p> <p>Max load: 88 lbs.</p>	<ul style="list-style-type: none"> • Section 4.1-service brakes • Section 4.3-mechanical suspension • Section 4.13-flag pole bracket • Section 4.19-tire markings • Section 4.20-tire pressure gauge • Section 4.22-owner's manual storage
<p>06-810-2944</p> 	<p>Yamaha/ Grizzly 80</p> <p>Engine: 80 cc</p> <p>Ages: 12 min</p> <p>Max load: 209 lbs.</p>	
<p>06-810-2943</p> 	<p>Polaris/ Predator 90</p> <p>Engine: 90 cc</p> <p>Ages:12 min</p> <p>Max load: 437 lbs total GVW (incl. rider & cargo)</p>	

Table 1: Summary of ATV samples studied

ATV Evaluation: Conformance to ANSI/SVIA 1-2001		Lifan	SUNL	Baja	Xtreme	Ohalee	Yamaha	Polaris
4.1	Service Brakes							
4.1.1	Front	P	P	P	F	F	P	P
4.1.2	Rear	P	P	P	P	P	P	P
4.2	Parking Brake	P	P	P	P	P	P	P
4.3	Mechanical suspension	P	P	P	F	F	P	P
	Front/2-inch min.	P	P	P	F	FN	P	P
	Rear/2-inch min	P	P	P	F	P	P	P
4.4	Engine Stop Switch							
4.4.1	Operation	F	P	P	P	P	P	P
4.4.2	Color	P	P	P	F	P	P	P
4.5	Manual (semi-auto) Clutch Control	NA	NA	P	NA	NA	P	P
4.7.1	Throttle Control Operation	P	P	P	P	P	P	P
4.8	Drivetrain Controls	P	NA	NA	NA	NA	P	P
4.8.1	Manual Transmission Gearshift Control	P	NA	NA	NA	NA	P	P
4.8.1.1	Operation of Foot Control	?	NA	NA	NA	NA	?	?
4.8.1.3	Gear Selection	NA	NA	NA	NA	NA	P	P
4.8.2	Other Controls	NA	NA	NA	NA	NA	P	P
4.9	Neutral Indicator	F	NA	NA	NA	NA	P	P
4.10	Reverse Indicator	NA	NA	NA	NA	NA	P	P
4.11	Electric Start Interlock	?	NA	NA	NA	NA	P	P
4.12	Carry Bar	P	P	P	P	P	P	P
4.13	Flag Pole Bracket	P	F	F	F	F	P	P
4.14	Manual Fuel-Shutoff Control	P	P	P	P	P	P	P
4.15	Handlebars	F	F	F	F	F	P	P
4.16	Operator Foot Environment	P	P	P	P	P	P	P
	vertically/down	P	P	P	P	P	P	P
	Horizontally/rear	P	P	P	P	P	P	P
4.17	Lighting Equipment (Head, tail , stop)							
4.17.1	Headlamp	P	P	P	P	P	P	P
4.17.1	Tail Lamp	P	P	P	P	P	P	P
4.17.2	Lamp Specifications	?	NA	NA	NA	NA	NA	NA
4.17.3	Requirements for Youth Category ATVs	N/A	P	P	P	P	P	P
4.19	Tire Marking							
	Inflation Pressure	P	P	P	P	P	P	P
	Bead Setting Pressure	P	P	P	P	P	P	P
	Other Markings	F	F	F	F	F	P	P
	Letter sizes	P	P	P	P	P	P	P
4.20	Tire Pressure Gauge	F	F	F	F	F	P	P
4.21	Security	P	P	P	P	P	P	P
4.22	Owner's Manual/Stowage location	P/F	P/F	P/F	P/F	P/F	P	P
4.23	Vehicle Identification Number (VIN)	P	P	P	P	P	P	P
6	Youth ATV Requirements							
6.1	Speed Limiting Devices	P	P	P	P	P	P	P
6.1.1	Tools Needed to Adjust or Remove	P	P	P	P	P	P	P
9.1	Pitch Stability, Kp at least 1.0	P	P	P	P	P	P	P

Table 2: Conformance of sample ATVs to VS

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<p align="center">US CONSUMER PRODUCT SAFETY COMMISSION</p> <p align="center">PRODUCT SAFETY ASSESSMENT REPORT</p> <p align="center">DRAFT</p> <p align="center">FOR OFFICIAL USE ONLY</p>		PSA No.	0702.06
		Case No.	PI060047 PI060048 PI060049 PI060052
		Requested By	Tanya Topka
		Regional Office	Both
		Sample No.	06-840-6430 06-840-7240 06-840-6290 06-840-6803 06-840-7265 06-840-2113 06-840-2455
		CPSC Seal	
		IDI No.	
Product:	ATV	Firm:	SUNL Group, Baja Motorsports, Kazuma, Ohalee, American Lifan, and Xtreme (Dealers Distributing)
Request:	Please review the owner's manuals for all 7 ATV models to determine if the manuals are adequate for consumers and if the language is clear		
Potential Hazard:			
Prepared by (Name and Title)		Reviewed by (Name and Title)	
Sarah B. Brown, Engineering Psychologist		Robert B. Ochsman, Ph.D., Director, Division of Human Factors	
Extension	7791		
Date		Date	

BACKGROUND

In 1998, several of the major ATV manufacturers agreed to a Letter of Undertaking (LOU) based on the Consent Decree filed in 1988. Several manufacturers agreed to include elements of the Consent Decree (CD) in their owner's manual, mainly those set forth in paragraph H.2.b.(2). Voluntary Letters of Undertaking (LOU) will be used for baseline assessment. None of the manufacturers represented in this PSA have agreed to the LOUs.

ATVs have been a long-standing project at the Consumer Product Safety Commission. The ATV Notice of Proposed Rule making has created a need for closer examination of consumer capabilities both while riding the ATV and also, more recently, assembling the ATV correctly and confidently.

The CPSC Office of Compliance has obtained seven all-terrain vehicles (ATVs) that were shipped to the CPSC laboratories. The ATVs arrived in various assembled conditions with alterations required to all of them before successful operation. The ATVs are being tested for conformance with the ANSI standard and will undergo dynamic and static testing at a research lab capable of obtaining the required data.

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The Engineering Sciences Human Factors (ESHF) staff has been asked to assess the manuals that came with the ATVs to determine adequacy for consumers and to evaluate the language. The ESHF staff intends to determine the adequacy of the materials that arrived with the ATV to completely and correctly assemble each of the ATVs. This assessment will involve describing the materials that arrived with each ATV, a description of the instructions and manuals, and finally a discussion of ATVs requiring assembly that have no corresponding instructions.

DISCUSSION

In order to assess the manuals by the same standard, the manuals were each evaluated on their conformance to the voluntary action plan regarding owner's manuals. The voluntary action plan includes an agreement to follow baseline information that each owner should be given. There are several sections in the consent decree that most of the legacy manufacturers have agreed to in their LOU; in short they are:

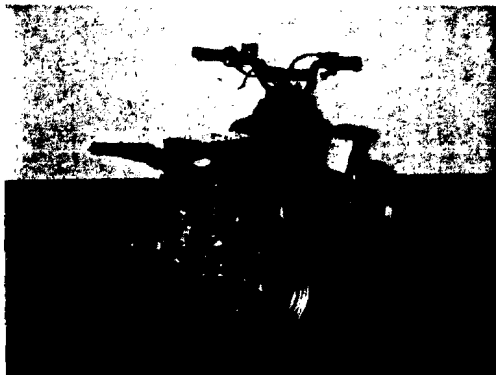
- a) Convey information regarding safe operation and maintenance
- b) Use plain, simple language comprehensible by an average 7th grader
- c) Information presented in a meaningful sequence
- d) Owner's manual consistent with other safety messages including manual supplements, warning labels, advertisements, promotional materials, point of purchase safety materials
- e) Each manual shall contain:
 - i. Statement on outside front cover, at a minimum, alerting the reader that the manual contains important safety information, which should be read carefully
 - ii. Statement on outside front cover stating age recommendations for the particular ATV model
 - iii. Definitions for "Warning" & "Caution" consistent with ANSI
 - iv. The following reminder shall be repeated immediately preceding the table of contents, at the beginning and end of the section describing the proper operating procedures, on the last page before the outside cover, and a total of at least 5 more times appropriately spaced:

WARNING: Indicates a potential hazard that could result in serious injury or death
 - v. Intro safety message at minimum

"Failure to follow the warnings contained in this manual can result in SERIOUS INJURY or DEATH."
 - vi. For ATVs with engine size < 90 cc, emphasize it's not a toy

"Children differ in skills, physical abilities, and judgment. Some children may not be able to operate an ATV safely. Parents should supervise their child's use of the ATV at all times. Parents should permit continued use only if they determine that the child has the ability to operate the ATV safely."
 - vii. Introductory safety section, which, at a minimum, contains the safety messages set forth in Appendix G
 - viii. An appropriate table of contents identifying major portions of the manual
 - ix. Description of the location of the warning labels on the ATV and an intro statement emphasizing the importance of understanding and following the labels, and keeping them on the ATV.
 - x. Description of pre-operating inspection procedures and a statement emphasizing the importance of these procedures
 - xi. Description of proper operating procedures and of potential hazards associated with improper operation
 - xii. Description of proper maintenance, storage, and transportation procedures
 - xiii. On the outside back cover, the contents of the general warning label described at paragraph H.1.a.(1)(a)
- f) Every owner's manual shall conform to the Guidelines for Warning and Caution Statements attached as Appendix H.

1. Ohalee, Sample # 06-840-6290



Included with this ATV are an Owner's Manual, two Parts Explored View, and Maintenance and Lubrication guide, and a Consumer Motor Vehicle Delivery Preparation and Inspection Form. There were no assembly instructions included with this ATV. Compliance staff noted that the ATV came in a crate assembled except for the handlebars and battery. It was also noted that the tires were over-inflated.

Although the manual follows some of the Consent Decree guidelines, there are several sections that do not conform to the voluntary action plan which are described below:

- (a) ESHF does not consider this manual to contain complete information on safe operation and maintenance.
- (b) An excerpt from the introduction yielded a Flesch-Kincaid reading level of 10.6 in Microsoft Word, suggesting that it might not be comprehensible to a 7th grader.
- (e.i) Does not contain statement on outside front cover alerting the reader that the manual contains important safety information, which should be read carefully.
- (e.ii) Does not contain statement on outside front cover stating the age recommendations for the particular ATV model
- (e.iv) The "Warning" definition reminder is not repeated, as advised, throughout the manual.
- (e.vi) The manual contains information regarding children skills and abilities and the importance of supervision, though it is not the prescribed format given in the consent decree.
- (e.vii) Some of the messages prescribed in Appendix 6 are missing, such as the engine size recommendation for children under the age of 16. Other messages are altered and rearranged in a non-succinct order, such as "ATV's with 50 cc engines, or less, may not be driven under 6 years of age in some countries." They have also added some statements that increase the cluttered appearance, for example, "If, in spite of all these precautions being followed, you are unfortunate enough to injure yourself, please seek medical attention immediately."
- (e.ix) The manual includes the warning labels on page 29, but fails to include a description of the location on the ATV and an intro statement emphasizing the importance of understanding and following the labels and keeping them on the ATV. Also, there is no age recommendation, but instead a weight recommendation of no one over 40kg with no conversion to lbs.
- (e.x) There is no section describing the pre-operating inspection procedures.
- (e.xi) While the manual describes some operating procedures, this is not a complete list and does not describe the potential hazards.
- (e.xii) The manual provides a table for periodic servicing and lists a timeline for each of the maintenance operations. It does not provide storage or transportation procedures.
- (e.xiii) Does not contain any warning information on the outside back cover.

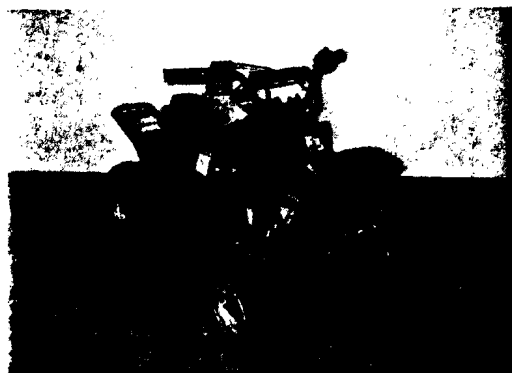
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- (f) The warnings in the manual do not follow the prescribed format described in Appendix H, such as the placement, readability, and format. There are warnings at the back of the manual that refer to the warnings located on the ATV that do follow the prescribed format.

One concern with this manual is the photographs and a step-by-step description of how to remove the engine from the "chaoois" (sic). This type of action would best be left to a professional, rather than the average consumer, especially since there are no instructions for re-assembling the engine and confusion could occur when replacing screws and bolts in the proper location.

The manual also refers to a Cruiser authorized dealer for periodic maintenance, yet no contact information is given for the dealer. There are also inconsistencies like using the word 'tyre' instead of 'tire'.

2. Kazuma, Sample # 06-840-6803



Included with this ATV is an Owner's Manual, two Parts Explored View. There were no assembly instructions included with this ATV. Compliance staff noted that the ATV came in a crate assembled except for the handlebars, battery and rear wheels.

Although the manual follows some of the Consent Decree guidelines, there are several sections that do not conform to the voluntary action plan which are described below:

- (a) ESHF does not consider this manual to contain complete information on safe operation and maintenance.
- (b) An excerpt from the introduction yielded a Flesch-Kincaid reading level of 10.6 in Microsoft Word, suggesting that it might not be comprehensible to a 7th grader.
- (e.i) Does not contain statement on outside front cover alerting the reader that the manual contains important safety information, which should be read carefully.
- (e.ii) Does not contain statement on outside front cover stating the age recommendations for the particular ATV model
- (e.iv) The "Warning" definition reminder is not repeated, as advised, throughout the manual.
- (e.vi) The manual contains information regarding children skills and abilities and the importance of supervision, though it is not the prescribed format given in the consent decree.
- (e.vii) Some of the messages prescribed in Appendix 6 are missing, such as the engine size recommendation for children under the age of 16. Other messages are altered and rearranged in an illogical order, such as "ATV's with 50 cc engines, or less, may not be driven under 6 years of age in some countries." They have also added some statements that increase the cluttered appearance, for example, "If, in spite of all these precautions being followed, you are unfortunate enough to injure yourself, please seek medical attention immediately."

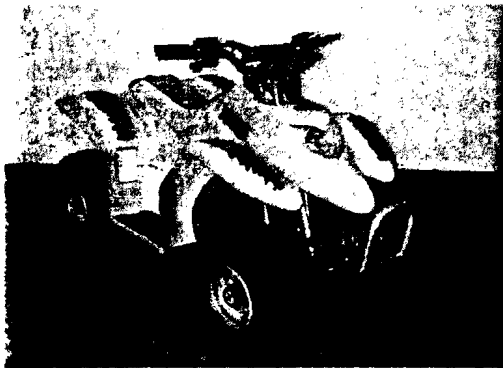
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- (e.ix) The manual includes the warning labels on page 30, but fails to include a description of the location on the ATV and an intro statement emphasizing the importance of understanding and following the labels and keeping them on the ATV. Also, there is no age recommendation, but instead a weight recommendation of no one over 40kg with no conversion to lbs.
- (e.x) There is no section describing the pre-operating inspection procedures.
- (e.xi) While the manual describes some operating procedures, this is not a complete list and does not describe the potential hazards.
- 1) (e.xii) The manual provides a table for periodic servicing and lists a timeline for each of the maintenance operations. It does not provide storage or transportation procedures.
- 2) (e.xiii) Does not contain any warning information on the outside back cover.
- 3) (f) The warnings in the manual do not follow the prescribed format described in Appendix H, such as the placement, readability, and format. The warnings at the back of the manual that refer to the warnings located on the ATV follow the prescribed format except yellow is used instead of the recommended orange.

The concerns with the Kazuma are the same as those with the Cruiser manual since they appear to be the same manual. One concern with this manual is the photographs and a step-by-step description of how to remove the engine from the chassis. This type of action would best be left to a professional, rather than the average consumer, especially since there are no instructions for re-assembling the engine and confusion could occur when replacing screws and bolts in the proper location.

The manual also refers to a Kazuma authorized dealer for periodic maintenance, yet no contact information is given for the dealer. There are also inconsistencies like using the word 'tyre' instead of 'tire'.

3. XTreme Motor, Sample # 06-810-2113



Included with this ATV are an Owner's Manual and Maintenance Guide, a Parts Manual, and a Service Manual. There were no assembly instructions included with this ATV. Compliance staff noted that the ATV came in a crate assembled except for the handlebars, front push bar, and battery.

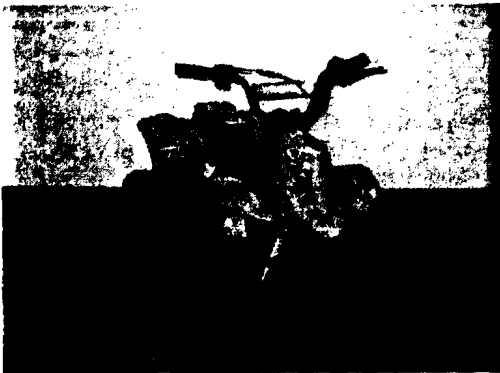
Although the manual follows some of the Consent Decree guidelines, there are several sections that do not conform to the voluntary action plan which are described below:

- (b) An excerpt from the introduction yielded a Flesch-Kincaid reading level of 8.4 in Microsoft Word, suggesting that it might not be comprehensible to a 7th grader.
- (e.v) The word 'SERIOUS' is missing before injury.
- (e.vii) Most of the statements prescribed in Appendix G are included in the manual. Several statements are lacking detail such as the engine size recommendations for certain age groups and a statement to never consume alcohol or drugs while operating the ATV.

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- (e.ix) The manual includes the warnings in the manual and the intro statement emphasizing the importance of the labels. While it does include numbers pointing to the warning location, it does not identify which warning is located at the corresponding numbers.
- (e.xiii) Does not contain any warning information on the outside back cover.

4. SUNL, Sample # 06-840-7240

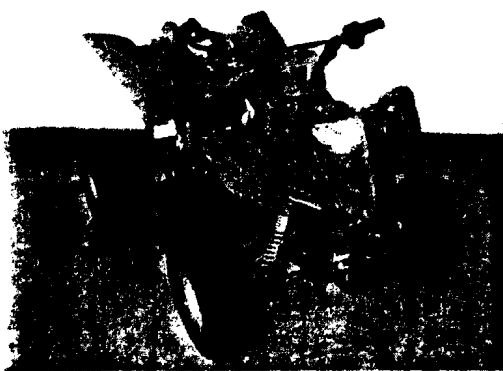


Included with this ATV is an Owner's Manual. There were no assembly instructions included with this ATV. Compliance staff noted that the ATV came in a crate fully assembled except for the battery.

Although the manual follows some of the Consent Decree guidelines, there are several sections that do not conform to the voluntary action plan which are described below:

- (a) ESHF does not consider this manual to contain complete information on safe operation and maintenance.
- (b) An excerpt from the introduction yielded a Flesch-Kincaid reading level of 12.3 in Microsoft Word, suggesting that it might not be comprehensible to a 7th grader.
- (e.i) Does not contain statement on outside front cover alerting the reader that the manual contains important safety information, which should be read carefully.
- (e.ii) Does not contain statement on outside front cover stating the age recommendations for the particular ATV model
- (e.iii) There are no definitions given for "Warning" and "Caution."
- (e.iv) The "Warning" definition reminder is not repeated, as advised, throughout the manual.
- (e.v) Does not contain the minimum intro safety message, "Failure to follow the warnings contained in this manual can result in SERIOUS INJURY or DEATH."
- (e.vi) The manual does not contain information regarding children skills and abilities and the importance of supervision.
- (e.vii) This manual fails to include most of the information given in Appendix G.
- (e.ix) This manual completely fails to include the warning labels that are located on the ATV or a statement emphasizing their importance.
- (e.xi) While the manual describes some operating procedures, this is not a complete list. It is also difficult to determine the difference between the operating procedures and potential hazards as there's not section or warning breaks. It also does not adequately describe the potential hazards
- (e.xii) The manual provides a maintenance schedule and a storage section. It does not provide transportation procedures.
- (e.xiii) Does not contain any warning information on the outside back cover.
- (f) The warnings in the manual do not follow the prescribed format described in Appendix H, such as the placement, readability, and format.

5. Long Chang, Sample # 06-810-2455



Included with this ATV is an Owner's Manual. There were no assembly instructions included with this ATV. Compliance staff noted that the ATV came in a crate with none of the four tires assembled, as well as the front push bar, handlebars, and battery.

Although the manual follows some of the Consent Decree guidelines, there are several sections that do not conform to the voluntary action plan which are described below:

- (a) ESHF does not consider this manual to contain complete information on safe operation and maintenance.
- (b) An excerpt from the introduction yielded a Flesch-Kincaid reading level of 10.1 in Microsoft Word, suggesting that it might not be comprehensible to a 7th grader.
- (e.i) Does not contain statement on outside front cover alerting the reader that the manual contains important safety information, which should be read carefully.
- (e.ii) Does not contain statement on outside front cover stating the age recommendations for the particular ATV model
- (e.iii) Does not include a definition of "Warning" or "Caution."
- (e.iv) The "Warning" definition reminder is not repeated, as advised, throughout the manual.
- (e.v) Does not contain the minimum intro safety message, "Failure to follow the warnings contained in this manual can result in SERIOUS INJURY or DEATH."
- (e.vi) The manual does not contain information regarding children skills and abilities and the importance of supervision.
- (e.vii) This manual fails to include some of the information given in Appendix G.
- (e.ix) This manual completely fails to include the warning labels that are located on the ATV or a statement emphasizing their importance. In two pictures in the manuals, warning labels can be seen on the ATV, though it is not possible to make out what the warning labels say other than the age recommendation of no one under 12 years of age. These pictures are for guidance on the location of ATV controls and not for the location of the warning labels.
- (e.x) There is a table listing items to check before operation with little detail and non-specific instructions.
- (e.xi) While the manual describes some operating procedures, this is not a complete list and does not adequately describe the potential hazards.
- (e.xii) The manual provides a maintenance schedule and a storage section. It does not provide transportation procedures.
- (e.xiii) Does not contain any warning information on the outside back cover.
- (f) The warnings in the manual do not follow the prescribed format described in Appendix H, such as the placement, readability, and format.

6. Baja, Sample # 06-840-6430



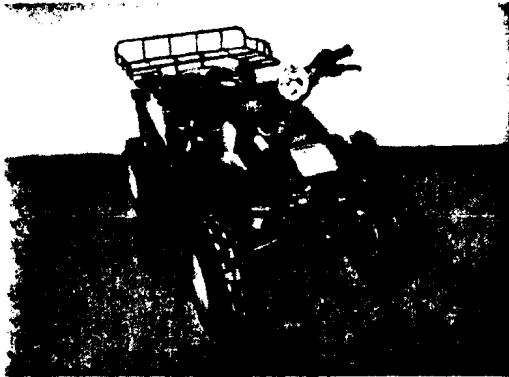
Included with this ATV are an Owner's Manual and Set-up Instructions. Compliance staff noted that the ATV came assembled except for the front push bar, grill cover, handlebar cover, and battery.

Although the manual follows some of the Consent Decree guidelines, there are several sections that do not conform to the voluntary action plan which are described below:

- (b) An excerpt from the introduction yielded a Flesch-Kincaid reading level of 10.7 in Microsoft Word, suggesting that it might not be comprehensible to a 7th grader.
- (e.i) Does not contain statement on outside front cover alerting the reader that the manual contains important safety information, which should be read carefully.
- (e.ii) Does not contain statement on outside front cover stating the age recommendations for the particular ATV model
- (e.iv) The "Warning" definition reminder is not repeated, as advised, throughout the manual.
- (e.v) The word 'SERIOUS' is missing before injury.
- (e.vi) The manual does not contain information regarding children skills and abilities and the importance of supervision.
- (e.vii) Most of the statements prescribed in Appendix G are included in the manual. Several statements missing such as the age recommendations and a statement to never consume alcohol or drugs while operating the ATV.
- (e.ix) The manual does include the warnings in the manual and the intro statement emphasizing the importance of the labels. While it does include numbers pointing to the warning location, it does not identify which warning is located at the corresponding numbers.
- (e.xiii) Does not contain any warning information on the outside back cover.
- (f) The warnings in the manual do not follow the prescribed format described in Appendix H, such as the placement, readability, and format.

This ATV came with a 10 page Set-up Instruction Manual. Each page has a line-drawing of the ATV with sequential steps of tasks to perform. The first page instructs the user to remove the cardboard wrapping from the metal frame, second they are to remove the upper part of the metal frame leaving the ATV on the support frame. Then they are to remove the front bumper, front grill cover, and the tires. Next, they are to lift the handle bar into position and fasten the upper bolt of the front shock absorbers. Then they are to re-fasten the front grill, bumper, and tires. Lastly, they are to install the battery, fill the gas tank, and adjust the choke switch. The instructions often refer to using the "bolts provided" without giving specific instruction as to which of the varying sized bolts are used where. A few of the instruction manual inadequacies are not providing a tool list, specifications for bolt size or even the torque required when installing the tires.

7. Lifan, Sample #06-840-7265



Included with this ATV are an Owner's Manual and Parts Catalog. There were no assembly instructions included with this ATV. Compliance staff noted that the ATV came assembled except for the front wheels, racks, fenders, wheel wells, light, and brush guard.

Although the manual follows some of the Consent Decree guidelines, there are several sections that do not conform to the voluntary action plan which are described below:

- (a) ESHF does not consider this manual to contain complete information on safe operation and maintenance.
- (b) An excerpt from the introduction yielded a Flesch-Kincaid reading level of 10.7 in Microsoft Word, suggesting that it might not be comprehensible to a 7th grader.
- (e.i) Does not contain statement on outside front cover alerting the reader that the manual contains important safety information, which should be read carefully.
- (e.ii) Does not contain statement on outside front cover stating the age recommendations for the particular ATV model.
- (e.iv) The "Warning" definition reminder is not repeated, as advised, throughout the manual.
- (e.v) Does not contain the minimum intro safety message, "Failure to follow the warnings contained in this manual can result in SERIOUS INJURY or DEATH."
- (e.vi) The manual does not contain information regarding children skills and abilities and the importance of supervision.
- (e.vii) This manual fails to include most of the information given in Appendix G.
- (e.ix) This manual completely fails to include the warning labels that are located on the ATV or a statement emphasizing their importance.
- (e.x) There is a list of seven items to check before operation with non-specific instructions.
- (e.xi) The manual does not include a complete list and description of operating procedures. For the operating procedures given, there are potential hazards.
- (e.xii) The manual provides a maintenance schedule and a storage section. It does not provide transportation procedures.
- (e.xiii) Does not contain any warning information on the outside back cover.
- (f) The warnings in the manual do not follow the prescribed format described in Appendix H, such as the placement, readability, and format.

CONCLUSION

Many of the manuals included with the ATVs did not conform to the Letters of Undertaking (LOU) to which the larger domestic manufacturers have agreed to. There were several inadequacies with most of the manuals ranging from a lack of warning statements to the lack of proper pre-operating and operating instructions. All of the manuals appear to have an average reading level above 7th grade and

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noticeably misspelled words or foreign spelled words such as "tyre" and "petrol" (for gasoline). A table summarizing the compliance of each of the ATVs to the LOU is included in this PSA.

More of a concern than the owner's manual is the assembly required before operation and the lack of instructions for 6 out of the 7 ATVs. The ATVs came with various parts to be attached or adjusted, such as a push- or a pull-bar with screws and bolts and the handlebars. There were no instructions for how to assemble the various parts and which screws and bolts to use. The set-up instructions included with the Baja 90 (06-840-6430) were non-specific when it came to parts to use and referred to "bolts provided" instead of the exact bolt to be used. Incorrect or partial assembly could be a major safety concern when the ATV is in use. A varying degree of ATV assembly is left to consumers with no proper guidance. The two manuals that could be considered marginally adequate with clear language are the Baja (06-840-6430) and the XTreme (06-310-2113). HF finds the remaining manuals to be inadequate for ATV consumers, which may lead to incorrect or incomplete assembly of the ATVs.

	06-840-6290	06-840-6803	06-810-2113	06-840-7240	06-810-2455	06-840-6430	06-840-7265
a) Convey information regarding safe operation and maintenance	F	F	P	F	F	P	F
b) Use plain, simple language comprehensible by an average 7 th grader	F- 10.6	F- 10.6	F-8.4	F- 12.3	F-10.1	F-10.7	F-10.7
c) Information presented in a meaningful sequence	NA	NA	NA	NA	NA	NA	NA
d) Owner's manual consistent with other safety messages including manual supplements, warning labels, advertisements, promotional materials, point of purchase safety materials	NA	NA	NA	NA	NA	NA	NA
e) Each manual shall contain:							
i. Statement on outside front cover, at a minimum, alerting the reader that the manual contains important safety information, which should be read carefully	F	F	P	F	F	F	F
ii. Statement on outside front cover stating age recommendation for the particular ATV model	F	F	P	F	F	F	F
iii. Definitions for "Warning" & "Caution" consistent with ANSI	P	P	P	F	F	P	P
iv. The following reminder shall be repeated immediately preceding the table of contents, at the beginning and end of the section describing the proper operating procedures, on the last page before the outside cover, and a total of at least 5 more times appropriately spaced: WARNING: Indicates a potential hazard that could result in serious injury or death	F	F	P	F	F	F	F
v. Intro safety message at minimum: "Failure to follow the warnings contained in this manual can result in SERIOUS INJURY or DEATH."	P	P	PP/F	F	F	PP/F	F
vi. For ATVs with engine size < 90 cc, emphasize it's not a toy: "Children differ in skills, physical abilities, and judgment. Some children may not be able to operate and ATV safely. Parents should supervise their child's use of the ATV at all times. Parents should permit continued use only if they determine that the child has the ability to operate the ATV safely."	PP/F	PP/F	P	F	F	F	F
vii. Introductory safety section, which, at a minimum, contains the safety messages set forth in Appendix G	PP/F	PP/F	PP/F	F	PP/F	PP/F	F
viii. An appropriate table of contents identifying major portions of the manual	P	P	P	P	P	P	P
ix. Description of the location of the warning labels on the ATV and an intro statement emphasizing the important of understanding and following the labels, and keeping them on the ATV.	PP/F	PP/F	PP/F	F	F	PP/F	F
x. Description of pre-operating inspection procedures and a statement emphasizing the important of these procedures	F	F	P	P	PP/F	P	PP/F
xi. Description of proper operating procedures and of potential hazards associated with improper operation	F	F	P	F	PP/F	P	PP/F
xii. Description of proper maintenance, storage, and transportation procedures	PP/F	PP/F	P	PP/F	PP/F	P	PP/F
xiii. On the outside back cover, the contents of the general warning label described at paragraph H.1.a.(1)(a)	F	F	F	F	F	F	F
f) Every owner's manual shall conform to the Guidelines for Warning and Caution Statements attached as Appendix H.	F	F	P	F	F	P	F

F = Fail, P = Pass, PP/F = Partial Pass/Failure

Further details given for Failures and Partial Pass/ Failures in Discussion Section of PSA

45

CONSUMER PRODUCT INCIDENT REPORT

Region: WESTERN

1. NAME OF RESPONDENT Darwin Keesee		2. PHONE NO. (HOME) (WORK) 816-228-2663 unknown	
3. STREET ADDRESS 1116 SW Eastman Street		4. CITY Blu Springs	ST ZIPCODE MO 64015
4a. EMAIL ADDRESS unknown		4b. INCIDENT CITY Blu Springs	ST ZIPCODE MO 64015

5. DESCRIBE INCIDENT OR HAZARD, INCLUDING DATA ON INJURIES
49 lb., 46" tall, son, was riding the atv on a track on a dirt and grass type surface, at about 5 to 6 miles per hour. Consumer
- cont -

6. DATE OF INCIDENT (S) 04/23/2006	7. IF INJURY OR NEAR MISS, OBTAIN AGE/SEX 6 Y/M AND DESCRIBE INJURY see narrative.	8. IF VICTIM DIFFERENT FROM RESPONDENT, PROVIDE NAME not given RELATIONSHIP son
---------------------------------------	---	---

9. DESCRIPTION OF PRODUCT gas powered children's all terrain vehicle	10. BRAND NAME Sunl
---	------------------------

11. MFR/DISTRIBUTOR NAME, ADDR. & PHONE Sunl Group In. 11410 Mathis Ave Farmers Branch, TX 75234 972-243-4555 unknown	12. MODEL, SERIAL #'s, DATE OF MFR M# ATV-70MR DOM unknown
	13. DEALER'S NAME, ADDRESS & PHONE unknown

ISSUE 30
0412512006

7/16/07

COMMENTS YES NO
EXCERPTS ATTACHED
DO NOT RE-NOTIFY RE-NOTIFY

14. WAS THE PRODUCT DAMAGED, REPAIRED OR MODIFIED? YES IF YES, BEFORE OR AFTER THE INCIDENT? AFTER DESCRIBE: damage: see narrative.	15. PRODUCT PURCHASED NEW DATE PURCHASED 1212512005 AGE 4 M
	16. DOES PRODUCT HAVE WARNING LABELS? IF SO, NOTE: 6 or above

17. HAVE YOU CONTACTED THE MANUFACTURER? YES IF NOT, DO YOU PLAN TO CONTACT THEM?	18. IS THE PRODUCT STILL AVAILABLE? YES IF NOT, ITS DISPOSITION	19. MAY WE USE YOUR NAME WITH THIS REPORT? YES
---	---	--

FOR ADMINISTRATION USE

20. DATE RECEIVED 04/24/2006	21. RECEIVED BY (NAME & OFFICE) myg/HL	22. DOCUMENT NO. H0640227A
23. FOLLOW-UP ACTION		24. PRODUCT CODE(S) 3286
25. DISTRIBUTION		26. ENDORSER'S NAME & TITLE myg 04/24/2006

CONSUMER PRODUCT INCIDENT REPORT

Region: WESTERN

H0640227A

Narrative Continued

said son came upon a slight bump and the atv rolled over, flipping son, who landed on the ground surface. Son sustained some bruising to his shoulders.

Consumer later noticed gas was dripping from ATV. Consumer proceeded to inspect the ATV, when he found gas was leaking from the plastic tank's seam, which is encased in a metal housing. Consumer said the gas was leaking onto the ATV's electronics.

04/24/2006 Consumer called and explained incident to manufacturer's rep. Chris (last name unknown) at 1-866-423-1072, who said that he will contact consumer for further assistance.

Consumer is concerned the ATV's gas tank can leak gas onto the electronics after an accident, presenting a fire explosion hazard.

Distributor Phone #:

CPSC Source: DIRECTORY

If you have any changes, additions, or comments you wish to make concerning your attached report, please make them in the space below.

(Please see the correction to 2nd paragraph of the complaint. Instead of "in a metal housing.", it should be "by the plastic body of the ATV and is attached to the metal frame of the ATV.")

I confirm that the information in the attached report (including any changes, additions, or comments I have made) is accurate to the best of my knowledge and belief.

Marvin Kessie 5/1/06
Signature Date

- I request that you do not release my name.
- You may release my name to the manufacturer but I request that you not release it to the general public.
- You may release my name to the manufacturer and to the public.

1. Task Number 040914CCN0982		2. Investigator's ID 8021		EPIDEMIOLOGIC INVESTIGATION REPORT
3. Office Code 830	4. Date of Accident YR MO DAY 2004 09 11	5. Date Initiated YR MO DAY 2004 09 15		
6. Synopsis of Accident or Complaint UPC The victim, an eleven year-old female at the time of the incident, sustained a minor thermal burn to her upper right thigh when the electric scooter she was riding overheated and began smoking.				
<p>MEMORIALS NOTIFIED</p> <p>COMMENTS: <input checked="" type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p> <p><input type="checkbox"/> ONE REPORT <input checked="" type="checkbox"/> ATTACHED</p> <p><input type="checkbox"/> EXCISE FROM FILE</p> <p><input checked="" type="checkbox"/> DO NOT RE-NOTIFY <input type="checkbox"/> RE-NOTIFY</p> <p style="text-align: right;"><i>mu</i> 7/16/07</p>				
7. Location (Home, School, etc) 1 - HOME		8. City ARLINGTON		9. State TX
10A. First Product 5042 - Scooters I Skateboards. Powe		10B. Trade/Brand Name SUNL		10C. Model Number E-21 SUNL250
10D. Manufacturer Name and Address SUNL GROUPS. INC. 11410 Mathis Ave. Farmers Branch, TX				
11A. Second Product 0		11B. Trade/Brand Name NONE		11C. Model Number NONE
11D. Manufacturer Name and Address NONE				
12. Age of Victim 11	13. Sex 2 - Female	14. Disposition 1 - Injured, not Hosp.	15. Injury Diagnosis 51 - Burn-Thermal	
16. Body Part(s) Involved 81 - UPPER LEG	17. Respondent 1 - Victim/Complainant	18. Type of Investigation 1 - On-Site	19. Time Spent (Operational / Travel) 16 / 4	
20. Attachment(s) 9 - Multiple Attachments		21. Case Source 07 - Consumer Complaint		22. Sample Collection Number
23. Permission to Disclose Name (Non NEISS Cases Only) <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Verbal				
24. Review Date 1011312004	25. Reviewed By 8631		26. Regional Office Director Eric B. Ault	
27. Distribution Rutherford, George W.			28. Source Document Number 10490213A	

The respondent in this on-site investigation was the consumer who filed an Internet form complaint with CPSC on or about 9/12/04. The on-site visit was conducted at the respondent's residence on 9/30/04. An attempt to visit the retail store where the subject product was purchased revealed the store was closed and no longer in business at the retail location.

The respondent stated that in December of 2003, she and her husband decided to purchase two identical electric scooters for their nine and eleven year-old daughters. Approximately \$219.00 plus tax was paid for each of the scooters that were purchased as Christmas presents for the two daughters. The only difference in the two scooters was the color of one was green and the other one was pink. The respondent stated that several children in their neighborhood had scooters and the purchase of the scooters was partially a "peer pressure" purchase. The respondent stated that the two scooters were purchased still in their shipping cartons and were picked up at the retailer by the father. The two scooters were delivered to the respondent's residence by the father and after removing from the shipping cartons, were assembled by the father. The father assembled the two identical scooters according to the assembly instructions provided with the scooters. The owner's manual for the scooters is attached to this report as Attachment #2. The assembly instructions included both written and figure photographs. The assembly for the scooters included the assembly of the handlebars, seat and wheels as well as adjusting the brakes. The respondent stated her husband and father of the two daughters had no difficulties in assembling the two scooters.

The two scooters were given to the two daughters on Christmas Day 2003. The respondent stated the two scooters were fully charged as instructed in the owner's manual and the two daughters immediately began to ride the scooters. The scooters were driven on the sidewalks and streets in the neighborhood. The respondent estimated for the first month, the two daughters rode the scooters three or four times a week for approximately 30 minutes per use. The respondent further stated that after the first month of use, the scooters were used less and less by the daughters as the newness began to wear off.

The respondent stated that after approximately 45 days of use, the green scooter that belonged to the eleven year-old daughter began blowing fuses and not holding an electrical charge. The father began replacing the blown fuses that reportedly were provided as extras with the scooter. The respondent also stated that the pink scooter belonging to the nine year-old daughter began having problems in that even with a full charge it began losing power and going much slower than it should when given a full acceleration. The respondent stated that when both of the scooters began experiencing problems, her two daughters lost more interest in the scooters and stopped using the scooters entirely as the summer of 2004 approached. The respondent stated that during the summer of 2004 neither of the two scooters was used by either daughter while school was out.

The respondent stated that on 9/11/2004, the two daughters decided to ride their scooters. The respondent stated that the nine year-old's pink scooter would not run at all even with a full charge and the green scooter belonging to the eleven year-old did not have a good fuse. The respondent stated that both daughters had had a birthday since the purchase of the scooters and were ten and twelve by this time. The fuse was removed out of the pink scooter and placed in the green scooter. The father performed this fuse replacement and charged the battery for the green scooter. The father then came into the house while the respondent was cleaning the house. The respondent stated that she remembered the twelve year daughter coming into the house and stated that her green scooter was working. The daughter then went back outside to continue to ride the scooter.

Approximately fifteen minutes later the twelve year-old daughter came back into the house and stated the scooter acceleration had stopped working and was taking off without turning the acceleration handle that is located on the right side of the scooter's handlebar. See the diagram of the scooter in the attached owner's manual that shows the acceleration device. The daughter also stated that the scooter also began smoking and she had burned her leg. The respondent stated that the daughter had a red mark on her inner upper right thigh approximately 1/2" to 1" in size. The respondent stated that the daughter did not tell her how she got the burn on her leg.

The father went outside to check on the scooter while the respondent put a burn ointment of the daughter's burn. The respondent also stated that no other medical treatment was needed and that the burn area did not blister or later scab over. After applying the burn ointment, the respondent stated she went out into the garage where the scooter was located. The respondent stated that when she got into the garage, it was filled with a light smoky haze and she could smell an electrical burn smell in the garage. There was not a smoke detector in the garage and the respondent stated that there would not have been enough smoke to activate an alarm anyway. The respondent stated that the father had removed the fuse of the scooter from its compartment and the scooter stopped smoking. The respondent also stated that the scooter had been in the driveway and the father had removed it to the garage after he removed the fuse. The respondent stated that after the incident, neither of the two scooters were used again by either daughter or further examined by anyone. The respondent also stated that after she contacted CPSC with her complaint, she attempted to contact the retailer and a website address noted on the subject scooters. She stated the retail store had closed and the website was not accessible.

Examination of the subject green scooter that was involved in the acceleration and smoking incident was conducted during the on-site visit. The respondent did not have a good fuse so the scooter could not be examined charged. Examination of the scooter did reveal what appeared to be melted wiring insulation to the wires directly connected to the fuse compartment. This examination also revealed exposed copper wiring that appears to have its insulation gone.

IDI 040914CCN0982

Page 3

An examination was made to the same fuse compartment area of the pink scooter and no obvious wiring insulation problems were noted. Attached to this report are photographs that were taken as a part of the scooter examination.

A visit was made to the retail location where the two scooters were purchased and this attempted visit revealed the store was closed and out of business at this location.

PRODUCT INFORMATION

The following information was obtained on the scooter involved in this incident.

PRODUCT: Electric Scooter

BRAND NAME: SunL

MODEL NUMBER: E-21 SunL250

SERIAL NUMBER: 261027-2

QUALITY CONTROL NUMBER: 4322403

RETAIL LOCATION: SunL Scooters
Northeast Mall
Hurst, Texas

MANUFACTURER: SunL Groups, Inc.
11410 Mathis Ave.
Farmers Branch, Texas 75234
972 243-4555
www.SunL.com

ATTACHMENTS

1. Authorization for Release of Name
2. Owners Manual
3. Photographs 1-14
4. Smoke Alarm Data Record Sheet

IDI 040914CCN0982

CONTACTS

Julie Cagle
1011 Arlena Drive
Arlington, Texas 76012
817 276-8758
juliecagleis@comcast.com



U. S. Consumer Product Safety Commission

AUTHORIZATION FOR RELEASE OF NAME

Thank you for assisting us in collecting information on a potential product safety problem. The Consumer Product Safety Commission depends on concerned people to share product safety information with us. We maintain a record of this information and use it to assist us in identifying and resolving product safety issues.

We routinely forward this information to manufacturers and private labelers to inform them of the involvement of their product in an accident situation. We also give the information to others requesting such about specific products. Manufacturers need the individual's name so that they can obtain additional information on the product or accident situation.

Would you please indicate on the bottom of this page whether you will allow us to disclose your name. If you ask that your name remain confidential, we will of course, honor that request.

After you have indicated your preference, please sign you name and date the document on the lines provided below.

jc X You are hereby authorized to disclose my name and address with the information collected on this case.

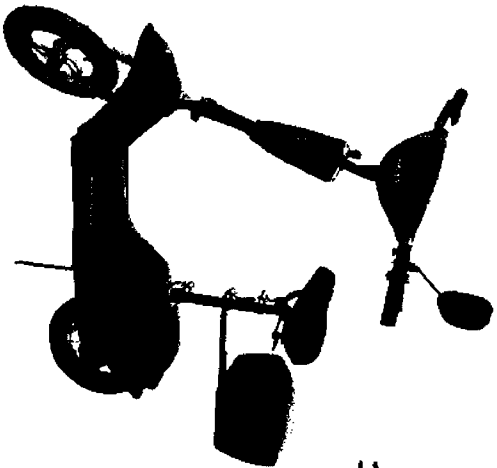
_____ My identity is to remain confidential.

Juan Carlos
Signature

9/30/04
Date

ELECTRIC SCOOTER

E-21



IPIT 0Y091422N0982
2



1.3 Charge instruction

1.3.1 To avoid damaging the battery, it is a must to use the charger appointed to charge the battery.

1.3.2 To confirm the charger input voltage in accordance with the socket voltage, then connect, if the red and green light in the charger are on, it means the power is connected. When the red light is becoming green, indicate the battery is full.

1.3.3 Charge time is not more than 18 hours.

1.3.4 To finish charge, please disconnect the power and unplug the charger plug.

1.3.5 Before storage, please charge the scooter fully, also suggest to charge the scooter per month.

1.4 Caution:

1.4.1 When riding on the smooth road at low windy speed, under the safety condition, should not stop and start the scooter frequently.

1.4.2 To ensure the battery to be in good condition, please charge it in time after your riding.

1.4.3 Should not start up the scooter frequently on the grade road.

2. Frame and instruction

2.1 The scooter is equipped with the battery of high power and lead-acid free of maintenance.

The battery is located in the best place, make the gravity point low, and insure the balance & safety to the rider.

2.2 This scooter is equipped with the electric driving control non-grade HHOER accelerator system, which can protect the motor and battery effectively and have a safety operation.

DOI 040914CC20982
#2

2.3 One special full automatic charger is used to this scooter, which can avoid overcharge.

3. Main technical parameter and function index

3.1 Entire scooter specification:

Max speed: 18Km/h Range per charge: 10Km
Max load: 85Kg Incline capacity: approx.4°
Span of two wheels: 860mm Net weight including battery: 28kg
Dimension (LxWxH): 1080 × 440 × 960mm
Tyre: front tire 12 inch rear tire 12 inch

IDI U40914CCN0982
#2

3.2 Motor parameter:

Rated power: 250W Rated volt: 24V

3.3 Battery:

Type: high power lead-acid storage battery free of maintenance

Current: 12Ah Voltage: 12V × 2

3.4 Charger:

Input volt: 110-220V Charge time: 4-7H

4. Assemble and adjust method

4.1 Assemble

4.1.1 Take out the scooter from the carton. (Figure.1)

4.1.2 Loose the flat bolt in the handle bar, remove the pin and insert the connector handle bar, then insert the pin shaft, tighten the bolt, turn and tighten the folding unit to steady the handle. (Figure 2)

3

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6. Troubleshooting
Please see the chart 2.

Chart 2: troubleshooting

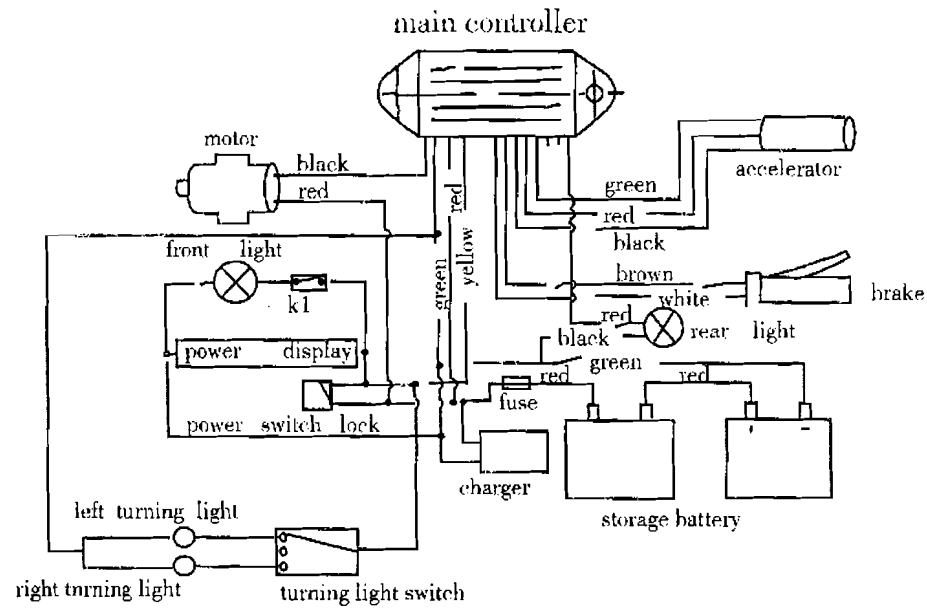
	Symptoms	Failure reasons	Methods of resolution
No.1	The speed cannot be out of order or the adjustable speed is lower than 10km/h.	1 The battery is undercharge; 2 The magnet steel of the motor mechanism connected with the steel cable is loose; 3 The spring of the motor mechanism is aging or losing efficiency.	(Charge the battery fully) (Clamp it after rewelding) (Recharge the spring)
No.2	The electric machinery stop rotating after reconnecting the power supply.	1 The battery wiring is loose; 2 The magnet steel of the motor mechanism connected with the steel cable is loose; 3 The wiring plug of electric machinery is loose or faulted; 4 Burn out the blown fuse; 5 The lead wire of the storage battery is broken.	(Repair and reconnect it) (Clamp tightly after rewelding) (Repair and rechange) (Recharge the blown fuse) (Reconnect it)
No.3	The driving distance is short of its requirement after charging at a time.	1 The tyre is short of air pressure; 2 Failure of the charger; 3 The battery is aged or damaged; 4 The battery is aged or damaged; 5 Many ascents or low temperature or heavy wind, the condition of the road surface isn't all-usable, weight body weight is over 90kg or the time of the brake is frequent; 6 The charge and discharge of the new battery is under 10 times.	(Charge it fully) (Repair the charger) (Recharge the controller) (Recharge the battery) (Still use the new battery, charge and discharge each it to upwards of 10 times)
No.4	The charge can not be charged	1 The charge socket dropped; 2 Burn out the blown fuse; 3 The lead wire of the storage battery dropped;	(Tighten the insert) (Recharge the blown fuse) (Reconnect it)
No.5	It can not show that the battery voltage is charged fully, it is difficult to start the electric machinery	1 Start the electric machinery and inspect the battery voltage is lower than 20V; 2 The battery main dropped; 3 The lead wire of the storage battery dropped;	(Recharge the battery) (Reconnect it and tighten it)

- 4.1.3 Assemble the handle bar, put the accelerator correct location, fix it with hex spanner. (Figure 3.)
- 4.2 Assemble the sandle pipe. adjust and tighten. (Figure 4.)
- 4.3 Adjust the rear brake
 - 4.3.1 Adjust the rear adjusting bolt, tighten the brake bar to insure rear wheel not turning, loose the brake bar, rear wheel turning freely. (Figure 5.)
 - 4.3.2 If brake shoe (brake rubber) wear-tear too much, please replace it in time.
- 4.4 Front wheel assembly, maintenance and service.
 - 4.4.1 Loose the front shaft nut, remove the special washer, follow the open direction the remove the front wheel.
 - 4.4.2 During the assembly, please put the bar of special washer to the hole ($\Phi 6.5$), tighten front shaft nut, insure the front wheel in correct location. (Figure 6.)
- 4.5 Adjust the chain
 - 4.5.1 Loose the rear shaft nut.
 - 4.5.2 Loose the bolts on both sides, move the rear wheel backside, adjust and make the chain running freely, tighten rear shaft nut. (Figure 7.)
- 4.6 Assembly the rear wheel
 - 4.6.1 Loose the rear shaft nut, put off the chain, take out the rear wheel.
 - 4.6.2 Put the chain, adjust the holt on both sides, finally, tighten the rear shaft nut. (Figure 8.)
- 5. Maintenance and service
 - 5.1 Daily inspection and service

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The model of E-21 general connection diagram



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#2

INSTRUCTION

1. SAFETY CAUTION

Please follow all the instructions mentioned in this manual and operate it correctly.

1.1 To ensure your and other people's safety, please obey all traffic rules and regulations, the user should ride it on the slow lane without taking anybody.

1.1.2 To ensure this scooter to have a long life, please read the manual instructions before your operation to this scooter. Don't lead it to the people who can't operate this scooter correctly.

1.1.3 Since the speed is fast, please be careful to use it in the snow or rain weather, have a brake in advance when braking is necessary.

1.1.4 Without adult's supervision, minors mustn't operate this scooter.

1.2 Operation instructions

1.2.1 To check if the scooter is in good situation.

1.2.2 To turn on the switch, the power light is on, it means the power is connected.

1.2.3 To hold two handle bars, lift the kickstand off the ground, turn the right accelerator at anticlockwise movement slowly, the scooter will speed up.

1.2.4 The scooter has the function of braking with power disconnect, when riding, use the brake to disconnect the power if necessary, and ensure to be safety.

1.2.5 When the volt of battery is lower 20.5V, the warning "beep" is sounding, please stop riding and charge soon.

1.2.6 When finishing ride, please turn off the switch and put down the kickstand.

- 1 To make sure if the motor has the clash, noise etc, abnormal phenomenon while running, please repair it in time if necessary.
- 2 To check if all parts and connectors are fixed well.
- 3 To check if the brake works well, any problem, please adjust or replace.
- 4 To check if all control and stay lines are perfect & flexible. Should not have any jamming phenomenon.
- 5 To check the pressure of two wheels to be up to instruction.
- 6 Please clean the scooter after use.

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#2

Regular inspection and maintenance

Please fill the front & rear axle, chain wheel etc, with lubricant regularly.

Chart 1 term inspection and maintenance

	300miles	600miles	1200miles	1800miles
Brake	A	1	A	1
Different control pull lines	L	1	L	1
Tyre	1	1	1	1
All the connect lines	1	1	T	1
Front fork and frame	1	1	1	1

Note: 1-inspection .clean and adjust 1: tighten A: adjust L: lubricant

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#2

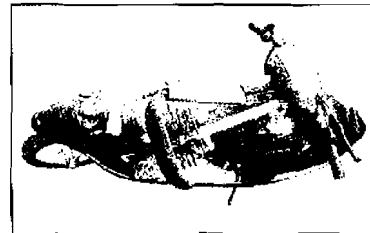
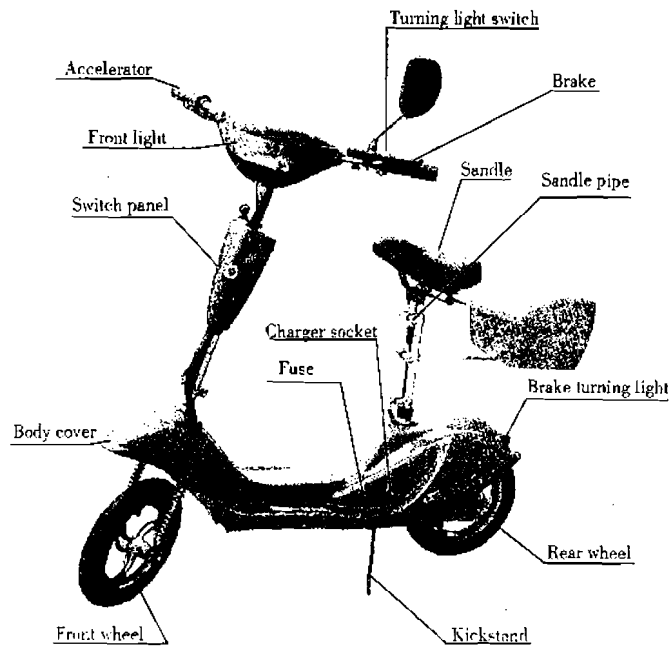


Figure 1

7

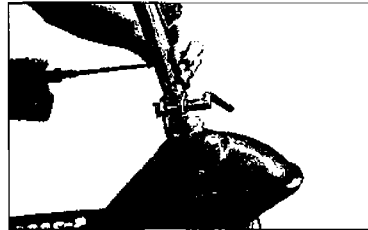


Figure 2

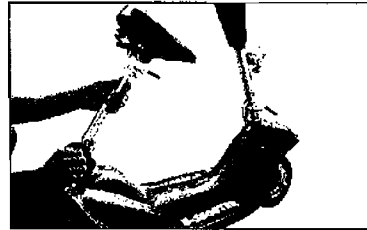


Figure 3

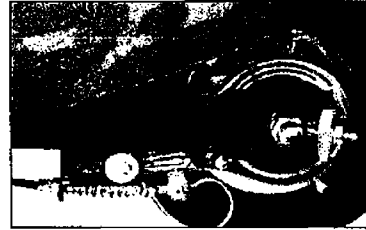


Figure 4



Figure 5

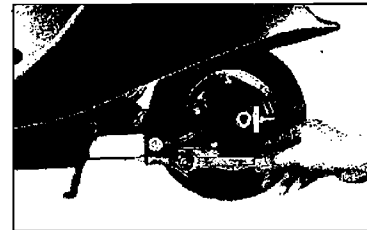


Figure 6

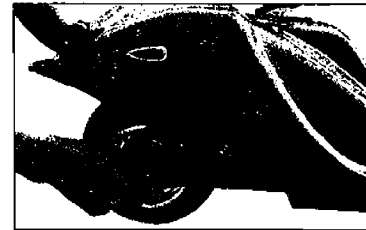


Figure 7

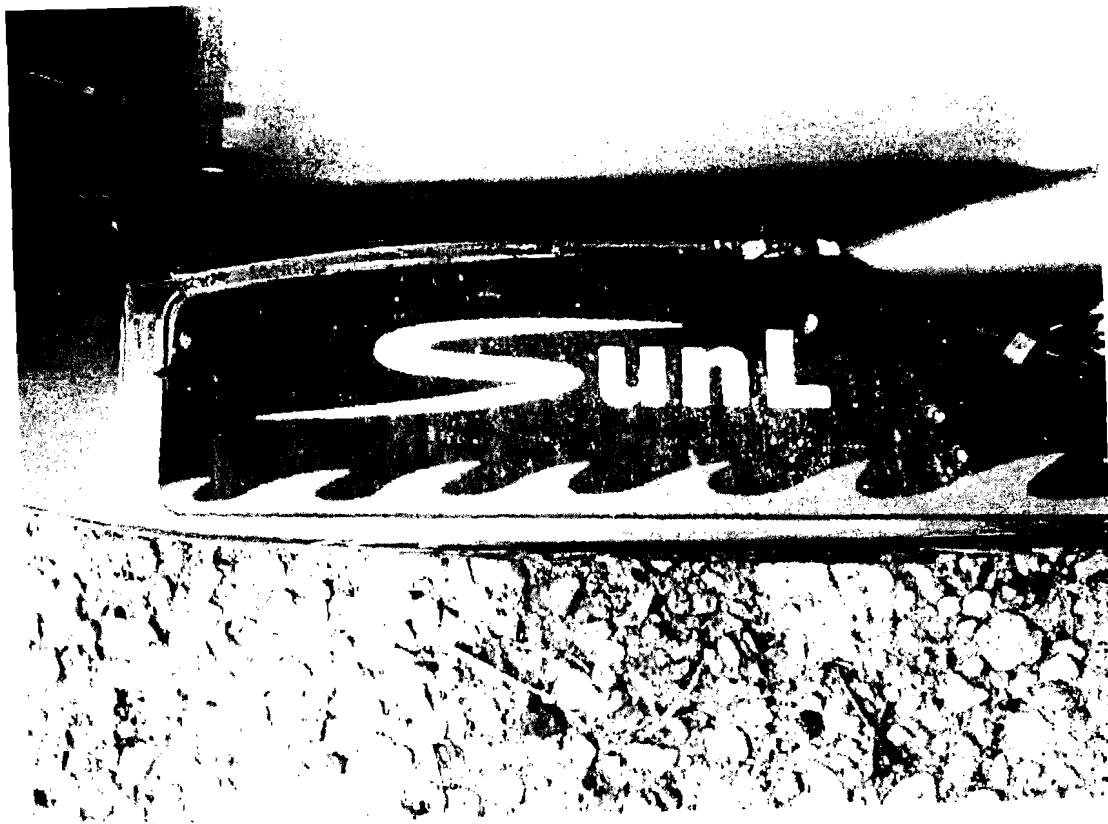
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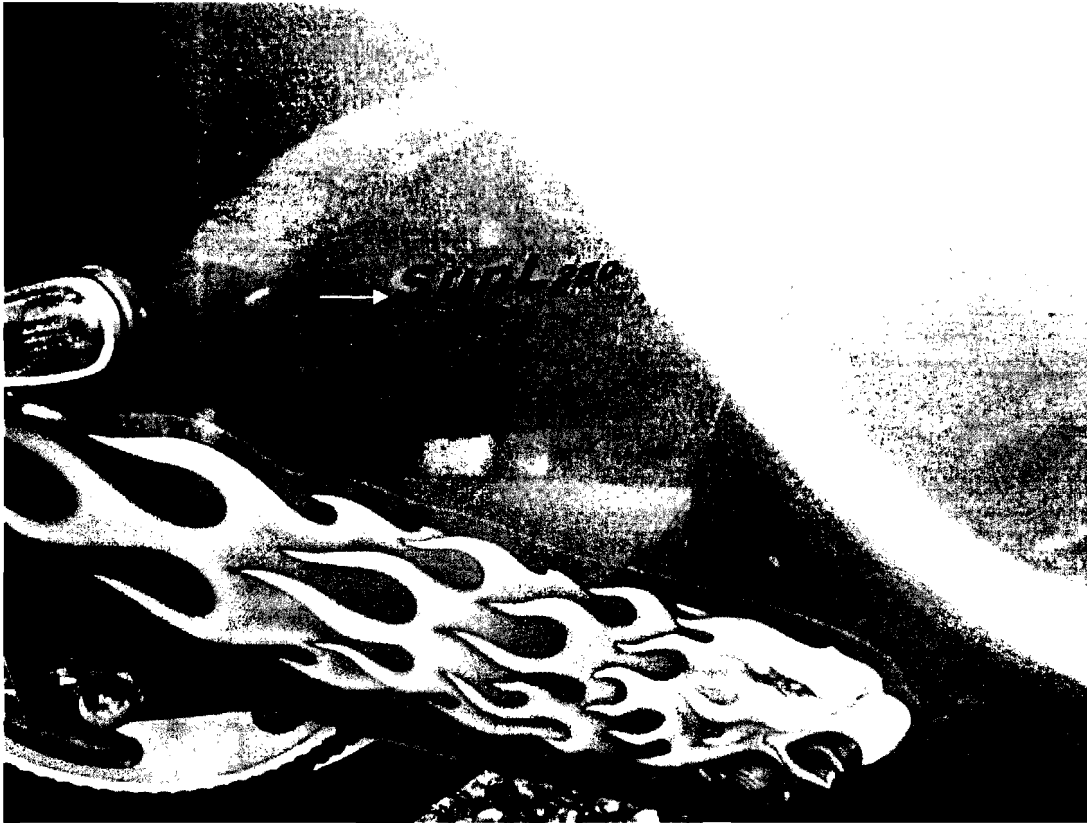
IDI 040914CCN0982 – Photo 1 – Overall view of the electric scooter.



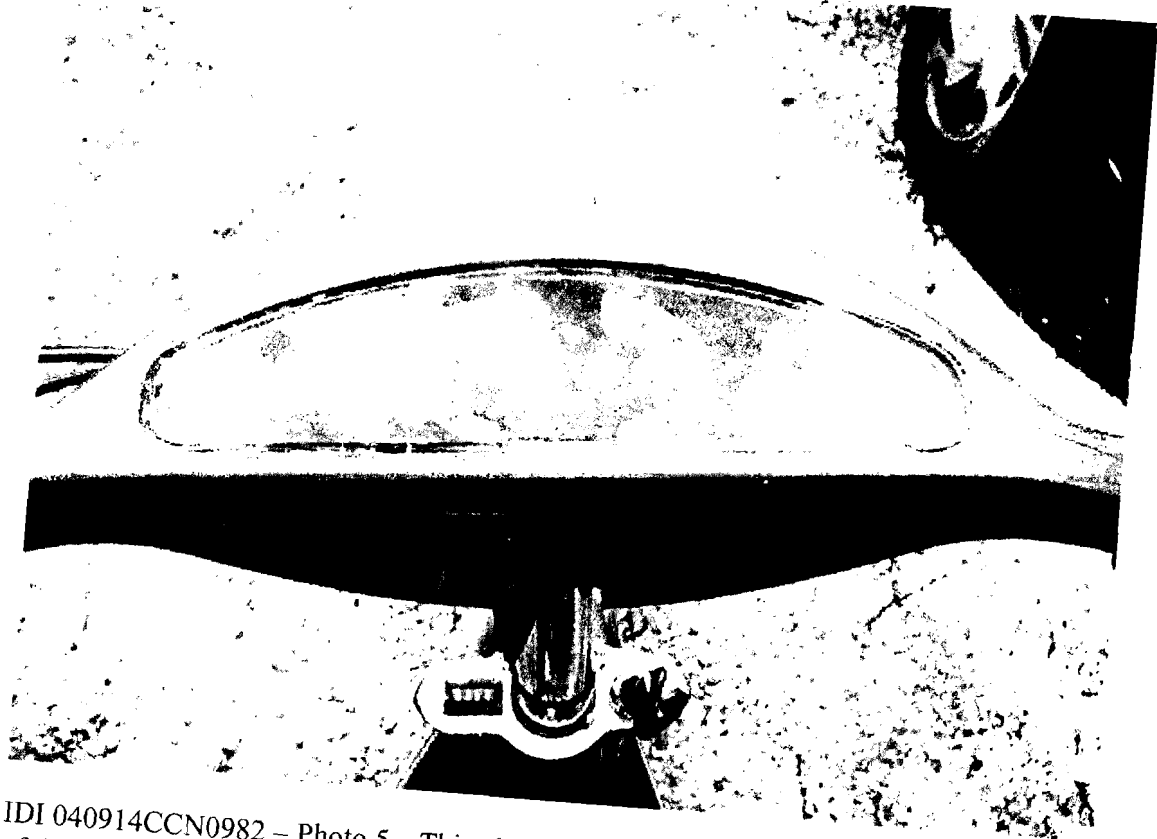
IDI 040914CCN0982 – Photo 2 – Another overall view of scooter.



IDI 040914CCN0982 – Photo 3 – This photo shows the brand name of the scooter “SunL”.



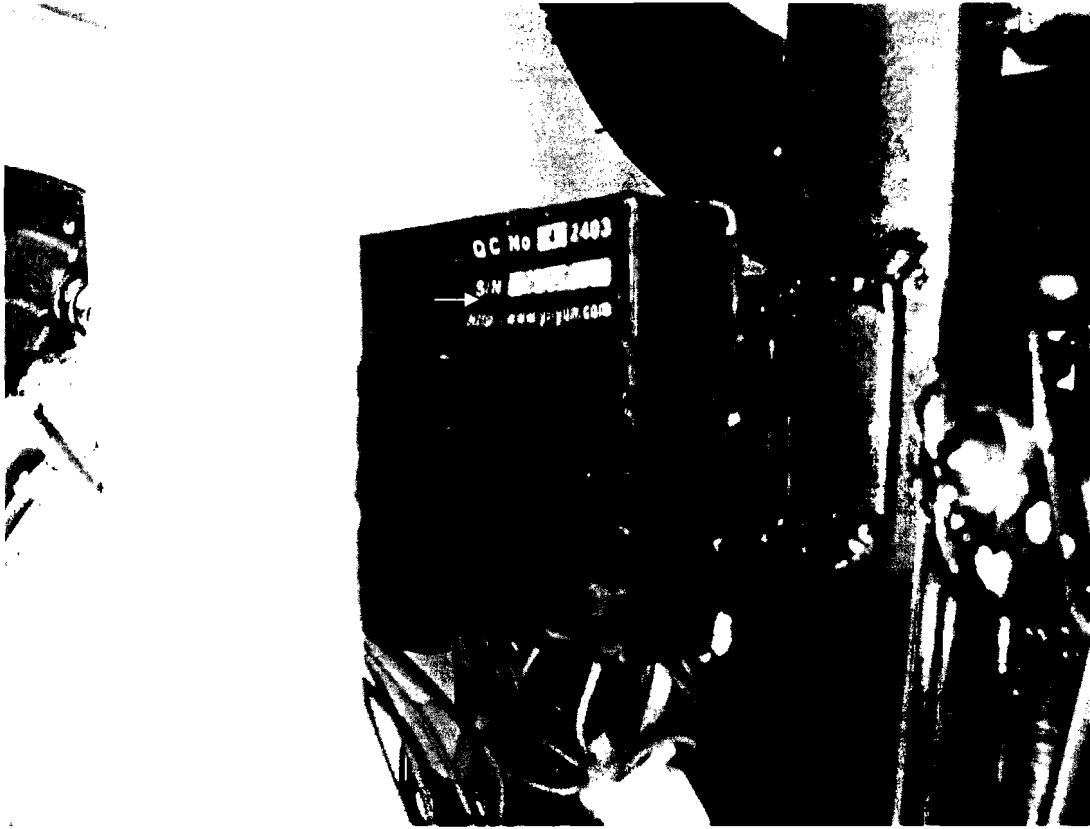
IDI 040914CCN0982 – Photo 4 – This photo shows the model number “SunL250”.



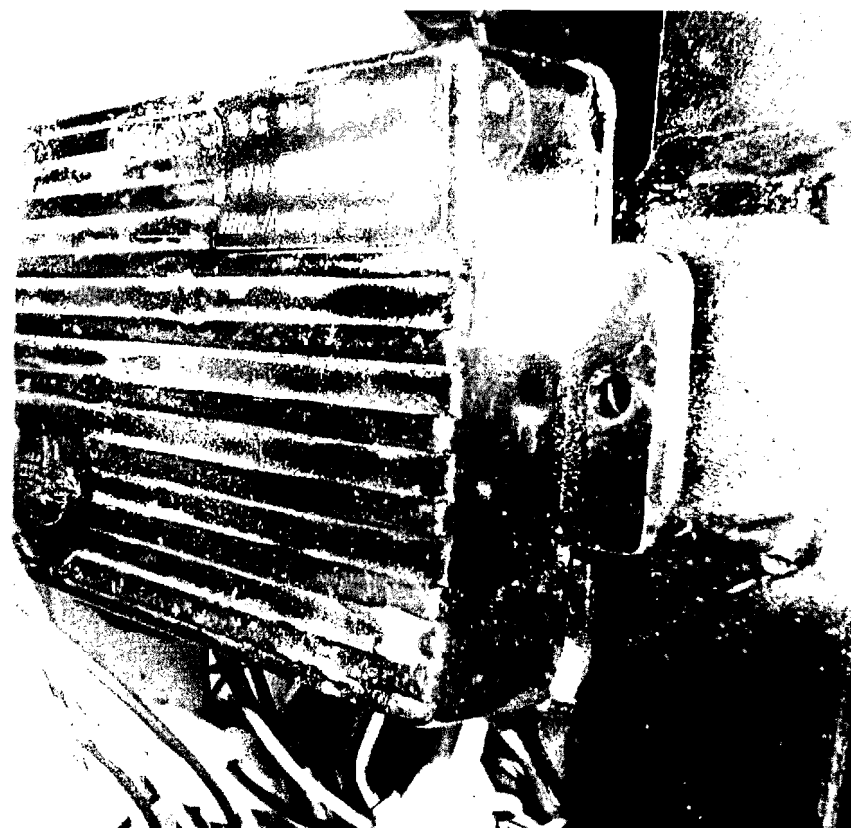
IDI 040914CCN0982 – Photo 5 – This photo shows the control panel on the handlebars of the scooter.



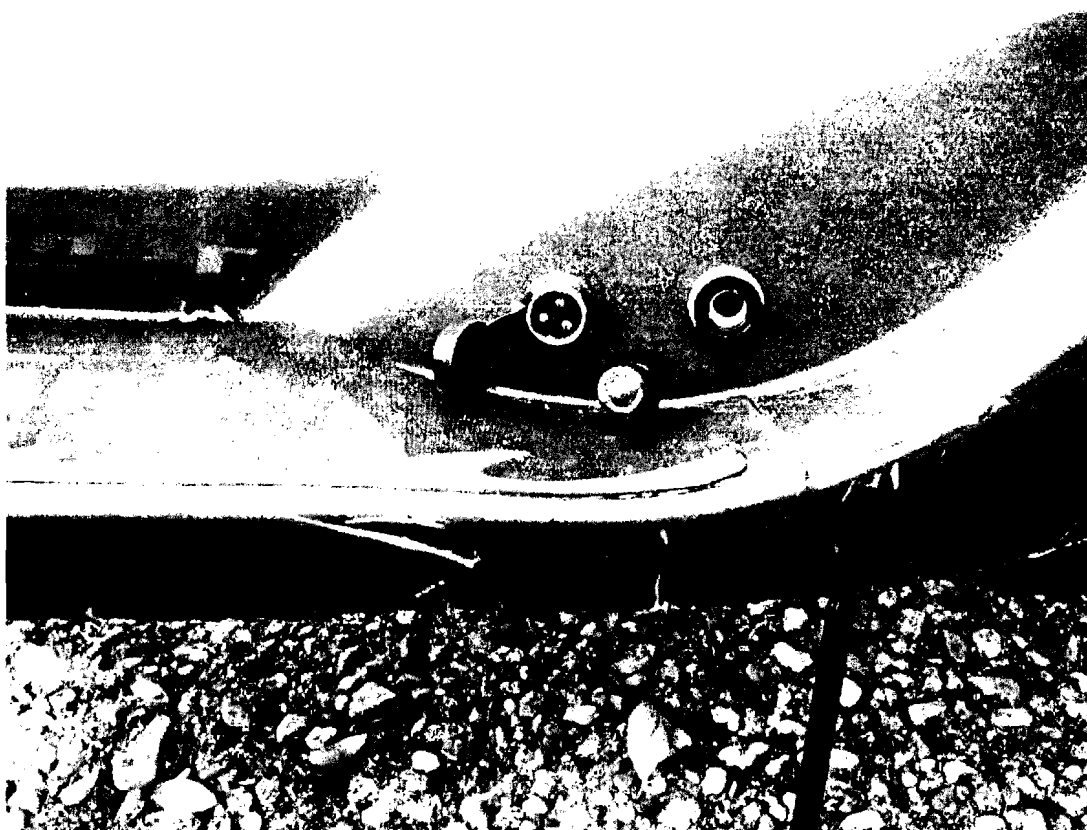
IDI 040914CCN0982 – Photo 6 – This photo shows the ignition switch of the scooter.



IDI 040914CCN0982 – Photo 7 – This photo shows the serial number of the scooter “261027-2”.



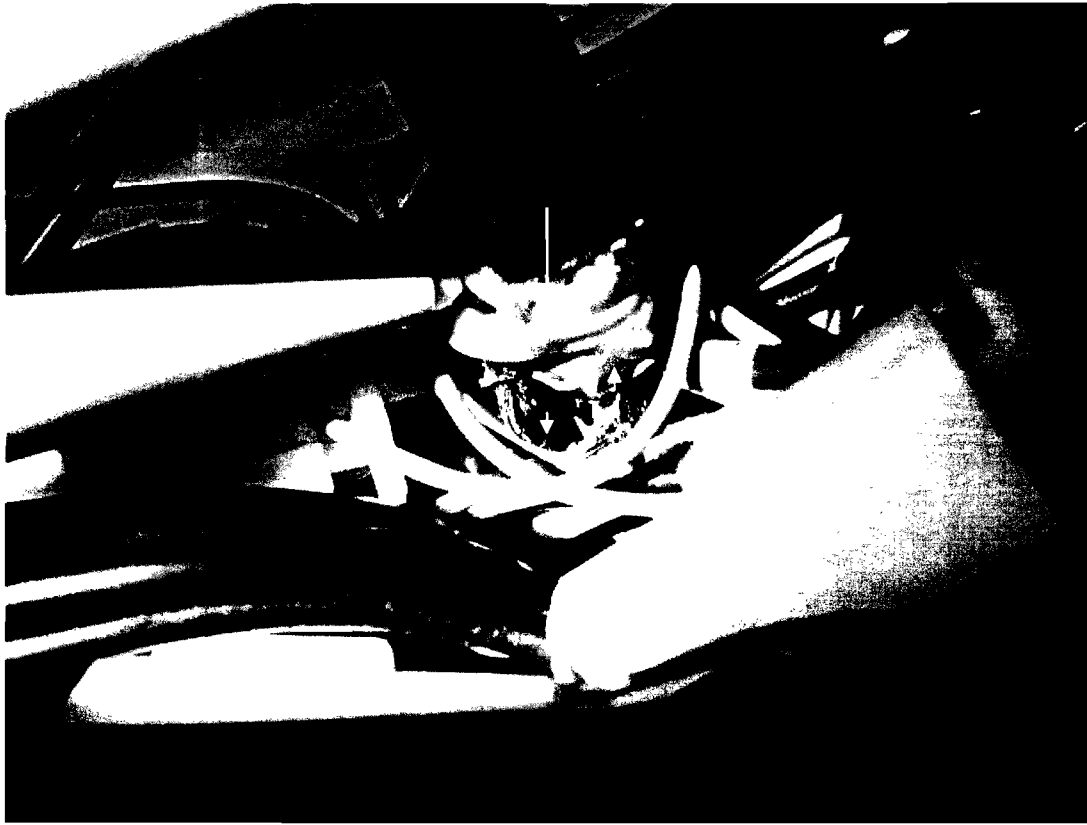
IDI 040914CCN0982 – Photo 8 – This photo shows the Q C Number “432403” and website www.yi-yun.com.



IDI 040914CCN0982 – Photo 9 – This photo shows the charger socket (red arrow) and fuse compartment (blue arrow) with fuse cap removed. The respondent stated that the scooter began accelerating without engaging the accelerator on the right side of the handlebar. The scooter then began to heat up from the motor and then large amounts of smoke were emitted. The 11 year-old daughter sustained a minor burn to her upper right thigh, but the respondent was not sure what part of the scooter burned the victim.



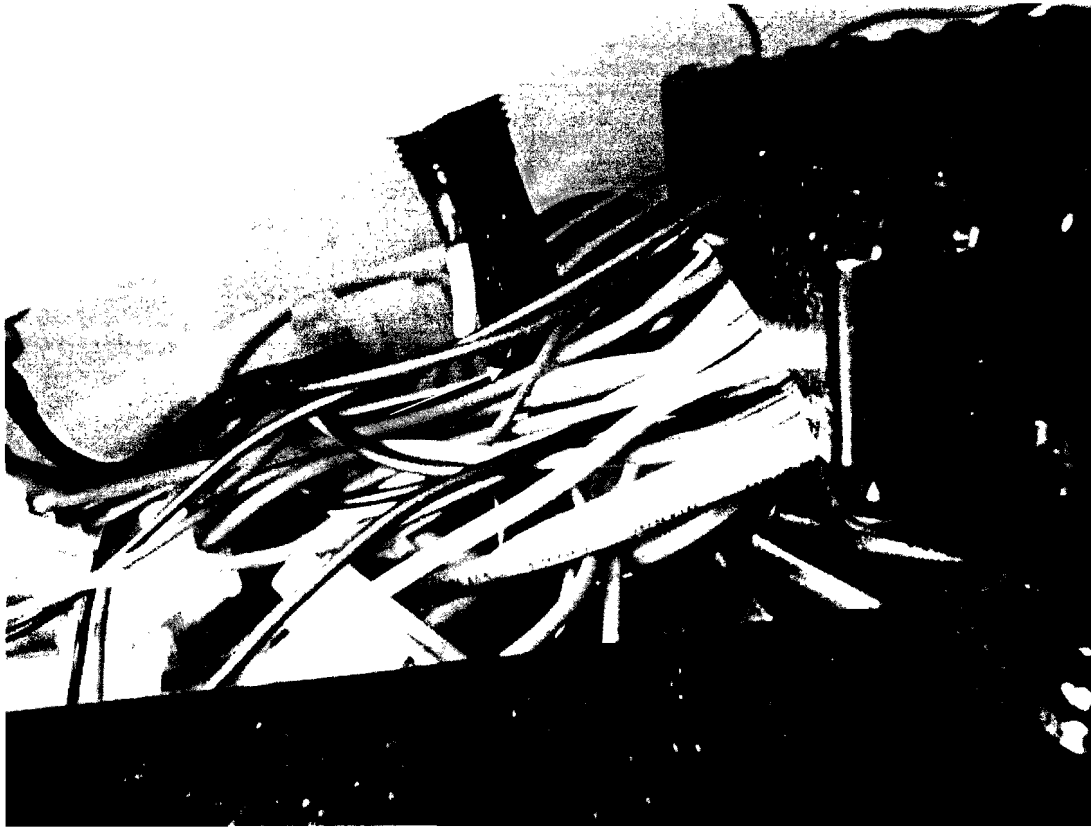
IDI 040914CCN0982 – Photo 10 – This photo shows a close-up of the electrical wiring connected to the bottom of the fuse compartment. Note the melted wire insulation in this area of the fuse compartment.



IDI 040914CCN0982 – Photo 11 – This photo shows another close-up view of the wiring connected to the bottom of the fuse compartment. Note the melted wire insulation and exposed copper wiring.



IDI 040914CCN0982 – Photo 12 – This is another close-up to the area of the wiring connected to the fuse compartment. Again note the melted wire insulation and exposed copper wiring. The yellow arrow points to the fuse compartment.



IDI 040914CCN0982 – Photo 13 – This photo shows the fuse compartment of the pink scooter that was not involved in the smoking and acceleration incident. Note that the wiring to this scooter does not appear to have the wire insulation melting problem noted with the green scooter.

040914CCN0982
#4

DATA RECORD SHEET
Investigation Guideline

PRODUCT: Smoke Alarms, Fire Sprinklers, and Fire Extinguishers
To be used as a supplement to investigations of residential fires where one or more of these products were present.

TASK NUMBER 040914CCN0982 **INCIDENT DATE** 9/11/2004

A. Smoke Alarms (Detectors):

1. Were there any smoke alarms present in this occupancy?
 Yes, continue - not in garage area
 No, SKIP to section B
 Unknown, SKIP to section B

2. Did a smoke alarm sound during the fire?
 Yes → Did the alarm contribute to initial recognition of the fire?
 Yes SKIP to Section B
 No SKIP to Section B
 Unknown SKIP to Section B
 No
 Unknown SKIP to Section B

3. Did enough smoke reach the alarm nearest to the fire origin that the occupant thought it should have sounded during the fire?
 Yes
 No SKIP to Section B
 Unknown SKIP to Section B

4. Was the alarm nearest to the fire origin powered?
 Yes SKIP to Question A.6
 No
 Unknown SKIP to Question A.6

5. What was the condition that resulted in lack of power?
 No battery
 Battery dead,
 Battery present but disconnected
 Alarm disconnected from electrical system (120 VAC)
 Electrical system inoperable,
 Other, describe _____

040914 CCN 0982
#4

6. Did the occupant have any problems with this alarm?

Yes, describe _____

No

Unknown

7. What are the characteristics of the alarm nearest to the fire origin?

a. Type:

Ionization (radioactive symbol)

Photoelectric

Combination

Unknown

b. Power source:

Battery only, SKIP to Question 7.d

Connected to electrical system (120 VAC)

Combination (120 VAC with battery back-up)

Unknown, SKIP to Question 7.d

c. Interconnected? (When one alarm sounds, they all sound. Ask the homeowner.)

Yes

No

Unknown

d. Manufacturer/Model: _____

e. Approximate age: _____ years

8. Additional comments: _____

B. Fire Sprinklers

1. Was there a fire sprinkler system in this occupancy?

Yes, continue

No, SKIP to Section C

Unknown, SKIP to Section C

2. Did the room of origin have sprinkler heads installed?

Yes

No

Unknown

3. Did the sprinkler system operate during the fire?

- Yes
- No
- Unknown

4. Did flame damage extend outside the room of origin?

- Yes
- No
- Unknown

5. Was the water to the system turned on at the time of the fire?

- Yes
- No → Why not? _____
- Unknown

6. Sprinkler System Characteristics:

a) Type

- Wet Pipe
- Dry Pipe
- Preaction
- Other, describe _____
- Unknown

b) Age: _____ years

c) Manufacturer/Model _____

7. Additional comments: _____

C. Fire Extinguishers

1. Was there a fire extinguisher in this occupancy?

- Yes
- No End of Data Record Sheet
- Unknown End of Data Record Sheet

2. Did the occupant try to use a fire extinguisher to control the fire?

- Yes → Describe degree of success _____
- No
- Unknown

040914CCN0982
#4

3. Fire Extinguisher Characteristics:

a) Rating

_____ Class A

_____ Class B

_____ Class C

_____ Combination., specify _____

_____ Other, spccify _____

_____ Unknown

b) Age: _____ years

c) Manufacturer/Model _____

4. Additional comments: _____

GAUSERS\EPHALIS\Word\Investigation Guideline Fire Safety Deviccs.doc

I0490082A

50

09/08/2004

09/05/2004 16:38:03

Name = ERICA L. BOWMAN
Address = RT. 3 BOX 5602
City = JACKSONVILLE
State = Texas
Zip = 75766
Email = ericabj@aol.com
Telephone = 9037953317
Name of Victim = CHRISTOPHER E. BOWMAN
Victim's Address = RT. 3 BOX 5602
Victim's City = JACKSONVILLE
Victim's State = Texas
Victim's Zip = 75766
Victim's Telephone = 9037953317

~~RECEIVED~~ 9/6/04
COMMENTS: YES NO
OVERFOED: APPROVED
EXCERPTS/FOIA Ex: _____
Revision: _____
 DO NOT RE-NOTIFY RE-NOTIFY

Incident Description: WHILE THE CHILD WAS RIDING THE E-21 SCOOTER SOLD BY THE SUNL GROUP, SPARKS AND FIRE SHOT OUT FROM UNDER THE SCOOTER. MY CHILD JUMPED OFF OF THE SCOOTER AND RAN LEAVING IT IN THE ROAD. I WAITED FOR THE SCOOTER TO COOL OFF AND TOOK IT BACK TO MY HOME. NOE MY SON IS PETRIFIED TO RIDE THE SCOOTER AND IT IS KEPT OUTSIDE IN CASE IT CATCHES ON FIRE IN THE WIRES OR BATTERY.

Victim's age at time of incident = 10
Victim's sex = Male
Date of incident = July,2004
Product involved = E-21 RED SCOOTER 250W / 24V BATTERY
Product brand name/manufacturer = SUNL GROUP
Place where manufactured (City and State or Country) = 11410 MATHIS AVENUE FARMERS BRANCH, TX 75234
Product involved still available = Yes
Product model and serial number, manufacture date = E-21 RED SCOOTER 250W SIN 26103-4
Date product purchased = JUNE,2004
Name Release = Release name to the manufacturer and public

If you have any changes, additions, or comments you wish to make concerning your attached report, please make them in the space below.

I confirm that the information in the attached report (including any changes, additions, or comments I have made) is accurate to the best of my knowledge and belief.

Erica L. Bowman 9-14-04
Signature Date

- I request that you do not release my name.
- You may release my name to the manufacturer but I request that you not release it to the general public.
- You may release my name to the manufacturer and to the public.

1. Task Number 050909CCN0854		2. Investigator's ID TX		EPIDEMIOLOGIC INVESTIGATION REPORT
3. Office Code 840	4. Date of Accident YR MO DAY 2005 08 28	5. Date Initiated YR MO DAY 2005 09 21		
6. Synopsis of Accident or Complaint UPC A ten year-old female was riding her motorbike up an incline on an asphalt road when the rear wheel of the motorbike locked up because the seat's shock absorber broke loose from the frame. No injuries were sustained. <div style="text-align: center;"> <p>WERE/PSY/BR/NOTIFIED</p> <p>COMMENTS <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p> <p><input type="checkbox"/> OVERRULED <input type="checkbox"/> ATTACHED</p> <p><input type="checkbox"/> EXCISION OF PAGES <input type="checkbox"/> REVISION</p> <p><input checked="" type="checkbox"/> DO NOT RE-NOTIFY <input type="checkbox"/> RE-NOTIFY</p> <p style="font-size: 1.2em;"><i>7/16/07</i></p> </div>				
7. Location (Home, School, etc) 4 - Street or Highway		8. City KAUFMAN		9. State TX
10A. First Product 5035 - Minibikes, Powered		10B. Trade/Brand Name SUNL GROUP		10C. Model Number SLS815B
10D. Manufacturer Name and Address UNKNOWN				
11A. Second Product 0		11B. Trade/Brand Name NONE		11C. Model Number NONE
11D. Manufacturer Name and Address NONE				
12. Age of Victim 10	13. Sex 2 - Female	14. Disposition 0 - No Injury	15. Injury Diagnosis 70 - No injury	
16. Body Part(s) involved 99 - NO INJURY	17. Respondent 1 - Victim/Complainant	18. Type of Investigation 1 - On-Site	19. Time Spent (Operational / Travel) 8 / 4	
20. Attachment(s) 9 - Multiple Attachments		21. Case Source 07 - Consumer Complaint		22. Sample Collection Number
23. Permission to Disclose Name (Non NEISS Cases Only) <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Verbal				
24. Review Date 10/17/2005	25. Reviewed By 8631		26. Regional Office Director Frank J. Nava	
27. Distribution Topka Ivins, Tanya			28. Source Document Number 10590013A	

The information for this narrative was acquired during an on-site visit to the victim's rural home on 9/21/05. This inspector interviewed the victim, her sister and their mother.

The ten-year-old female was riding her SUNL Group motorbike up a paved private road near her home in Kaufman, TX. Her thirteen-year-old sister was riding ahead of her on her own motorized bike. Her parents purchased the vehicle on July 8, 2005 from a SUNL Motor Sport dealership in Farmer's Branch, TX. The model number of the bike is SLS-815B and the serial number is 0884593. The victim's mother was unable to provide a user's manual. She states her daughter had not used the product more than four times and it was on a second tank full of gas. Both girls were wearing helmets and other safety equipment according to their mother. It was a normal sunny Sunday afternoon when both girls were riding their motorized bikes up and down the smooth paved country road. It is located two miles from their home and the mother states it is a private road bordered on both sides by "Doublewide land/home package" residences. The victim states she had made a turn on the road and was following her sister. She was afraid of going uphill and was traveling approximately 10 miles per hour as she reached the summit of a slight incline on the road.

As the victim reached the top of the incline she heard a loud noise and the bike's rear wheel locked. The motor shut off and she skidded to a halt on the bike's right side. The forward momentum caused her to bruise her right arm against the edge of the bike's windshield before she fell to the side. Gasoline from a ruptured line spilled on her lower legs and formed a puddle on the road.

The victim's older sister heard the loud noise and looked back to see her sister skid to a stop. She turned her bike around to render aid. She helped her sister attempt to start the motorbike but was unsuccessful. Closer scrutiny of the bike's rear wheel revealed that the seat's shock absorber rod had torn off the frame and was jammed into the wheel. She went to a neighboring household and phoned her parents for assistance. The victim's father placed the motorbike in his truck and transported the victim home.

That same night he electronically mailed a memo to the dealership complaining about the incident. The distributorship responded the next day and requested he contact their parts department in Farmers Branch, TX. The parts department representative offered them a new vehicle but insisted they leave the motorbike with them for an assessment. They refused and contacted the Consumer Product Safety Commission hot line to report the incident in an attempt to prevent more injuries to unsuspecting consumers. The victim's mother states the victim is a diabetic and is concerned about the injuries her daughter would have sustained if she had been traveling at a higher rate of speed when the incident occurred.

On September 23, 2005, this inspector phoned the SUNL Group to attempt to acquire the manufacture's name and address. Mr. Jeff Boudreux, General Manager, requested I mail him a written request along with a copy of the complaint before he could provide any information. Time restrictions for report submission did not allow for this.

PRODUCT IDENTIFICATION:**Product:** SUNL Group Pocket Bike**Model number:** SLS-815B**Serial Number:** 0884593**Engine Block Number:** XY1P39FMB 050100145**Color:** Pink**Price:** \$513.00

Manufacturer:

N/A

Dealer:

SUNL Motor Sport
11410 Mathis Ave.
Farmers Branch, TX 75234
Tel: (866) 610-7865 Ext. 24 Tony Tarell

WARNING LABELS:

CAUTION!!!

Riders must comply with local allowable age rule, all local laws and reg (illegible). Minors shall never operate this product without adult supervision. DO NOT operate this product under the influence of medical treatment and alcohol. DO NOT ride this product without wearing protective equipment such as helmet, gloves, kneepads, elbow pads, and any necessary protection your local law requires. Read instructions carefully and always inspect this product prior to each use to ensure it is in a safe operating condition. DO NOT operate this product until you can safely start, stop, turn, and yield to all obstacles environment. This product is not intended for use on public roads or highways: near water, sloped driveways or alleyways during nighttime or inclement weather conditions: or on slippery or uneven surfaces.

ATTACHMENTS

1. Photo exhibits.
2. Release of Name.

CONTACTS

Mr. Jeff Boudreux, General Manager, SUNL Motor Sport 11410 Mathis Ave.
Farmers Branch, TX 75234 Tel: (866) 610-7865. Initial phone contact was 9/23/05.



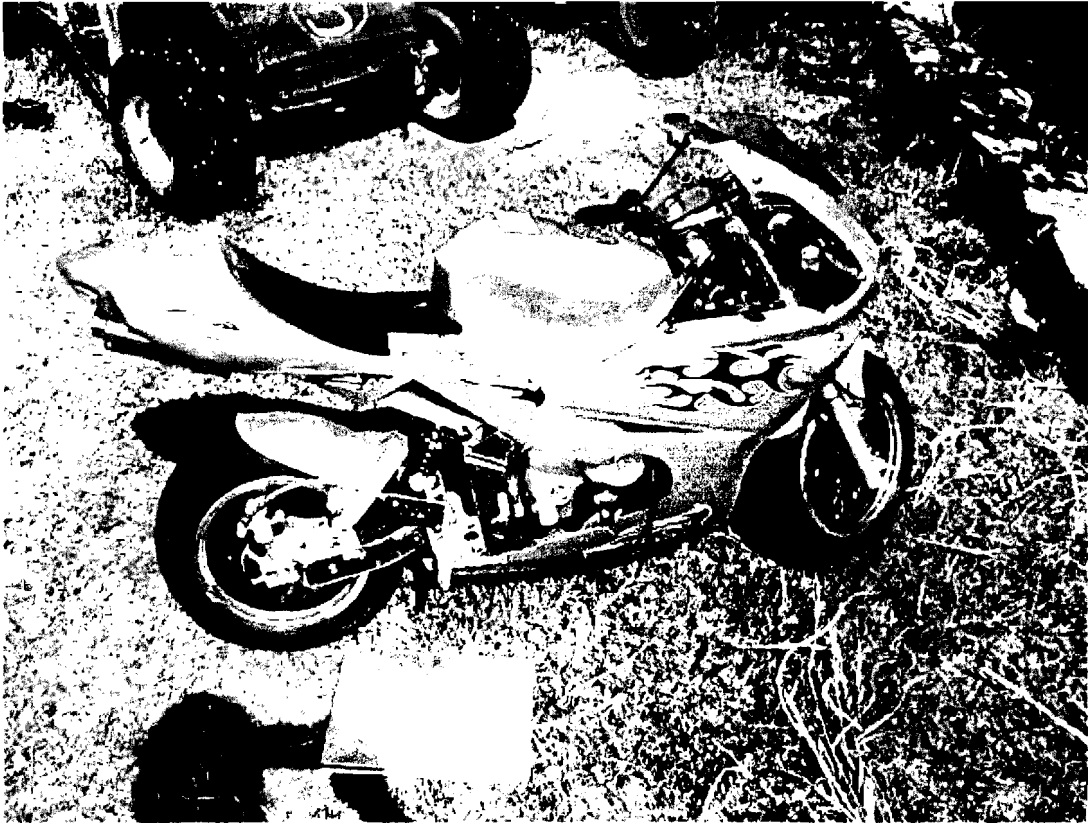
050909CCN0854 – Photo 1 – This photo shows an overall view of the incident site.

Exhibit 1



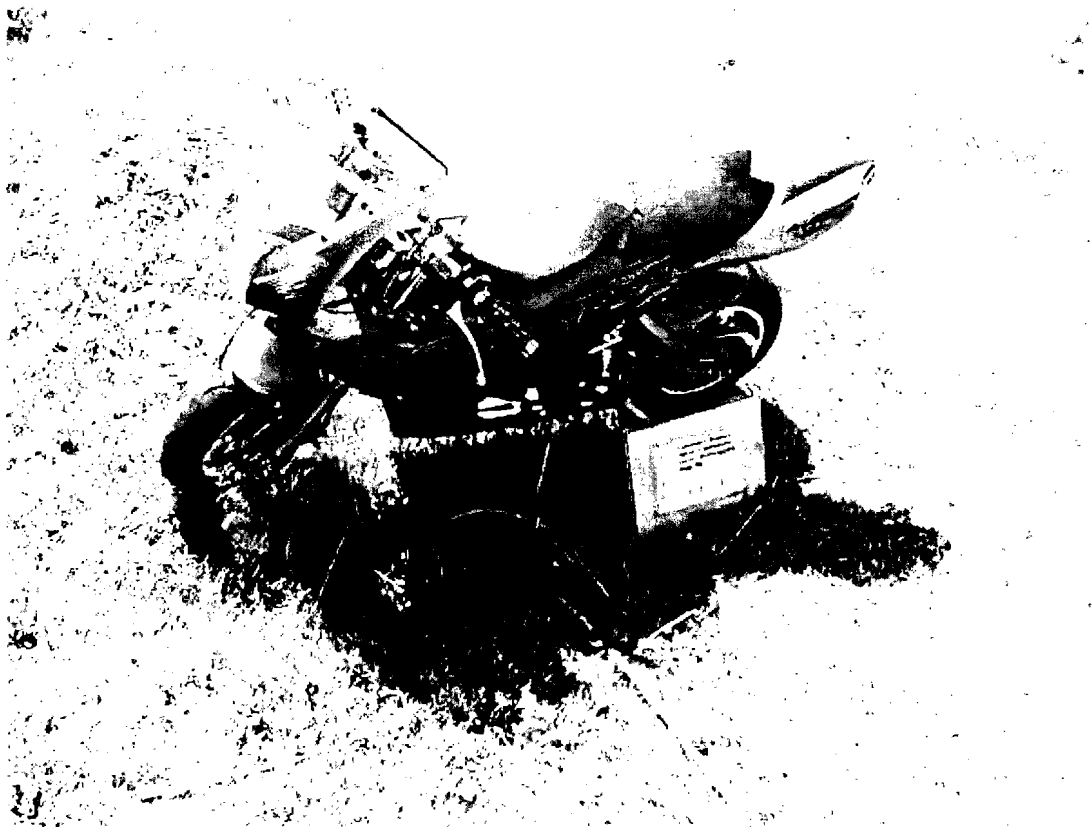
050909CCN0854 – Photo 2 – This photo shows an area in the road where the gas line ruptured and gas spilled onto the road.

Exhibit 1



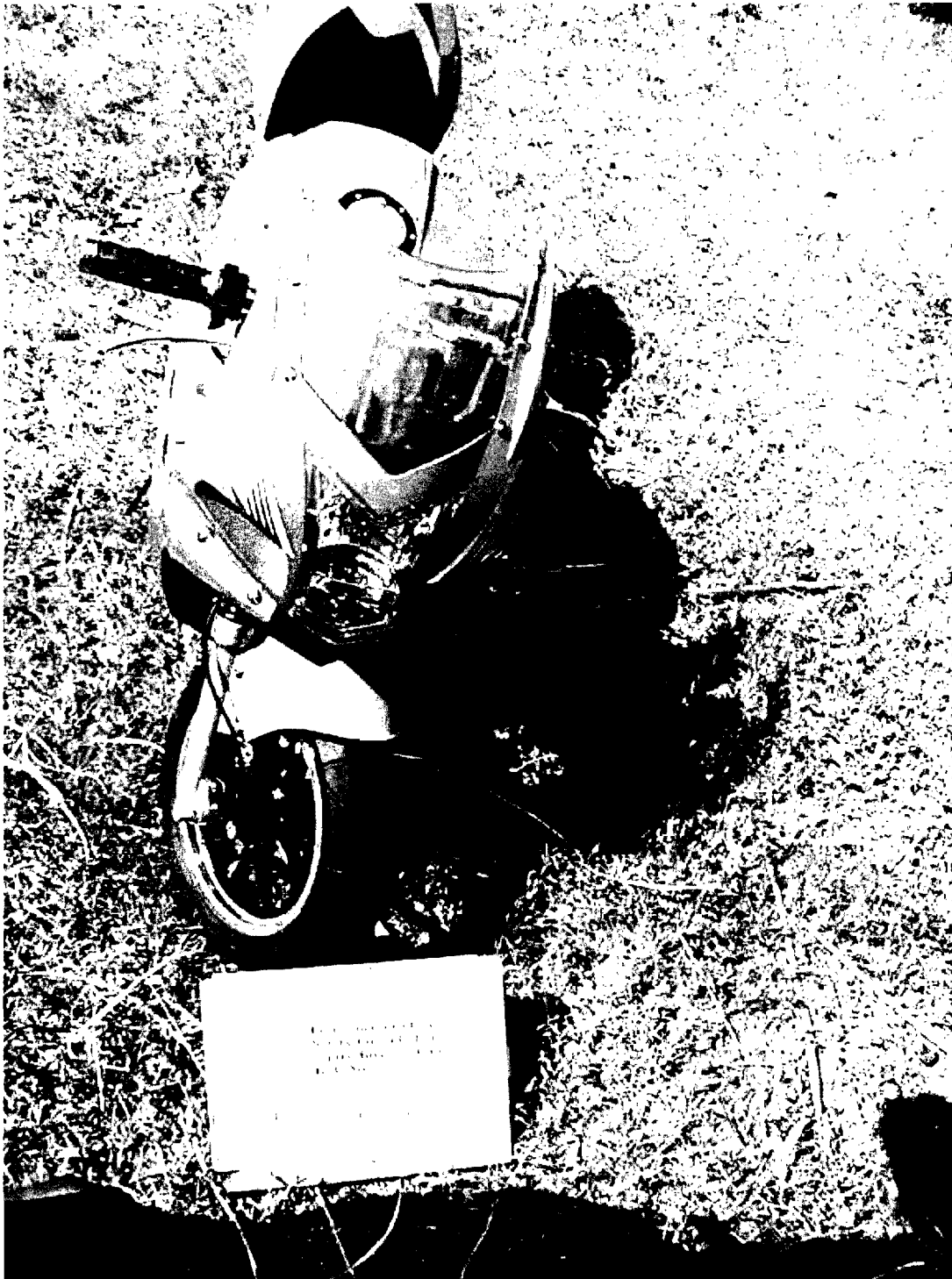
050909CCN0854 – Photo 3 – This photo shows an overall view of the motorized bike.

Exhibit 1



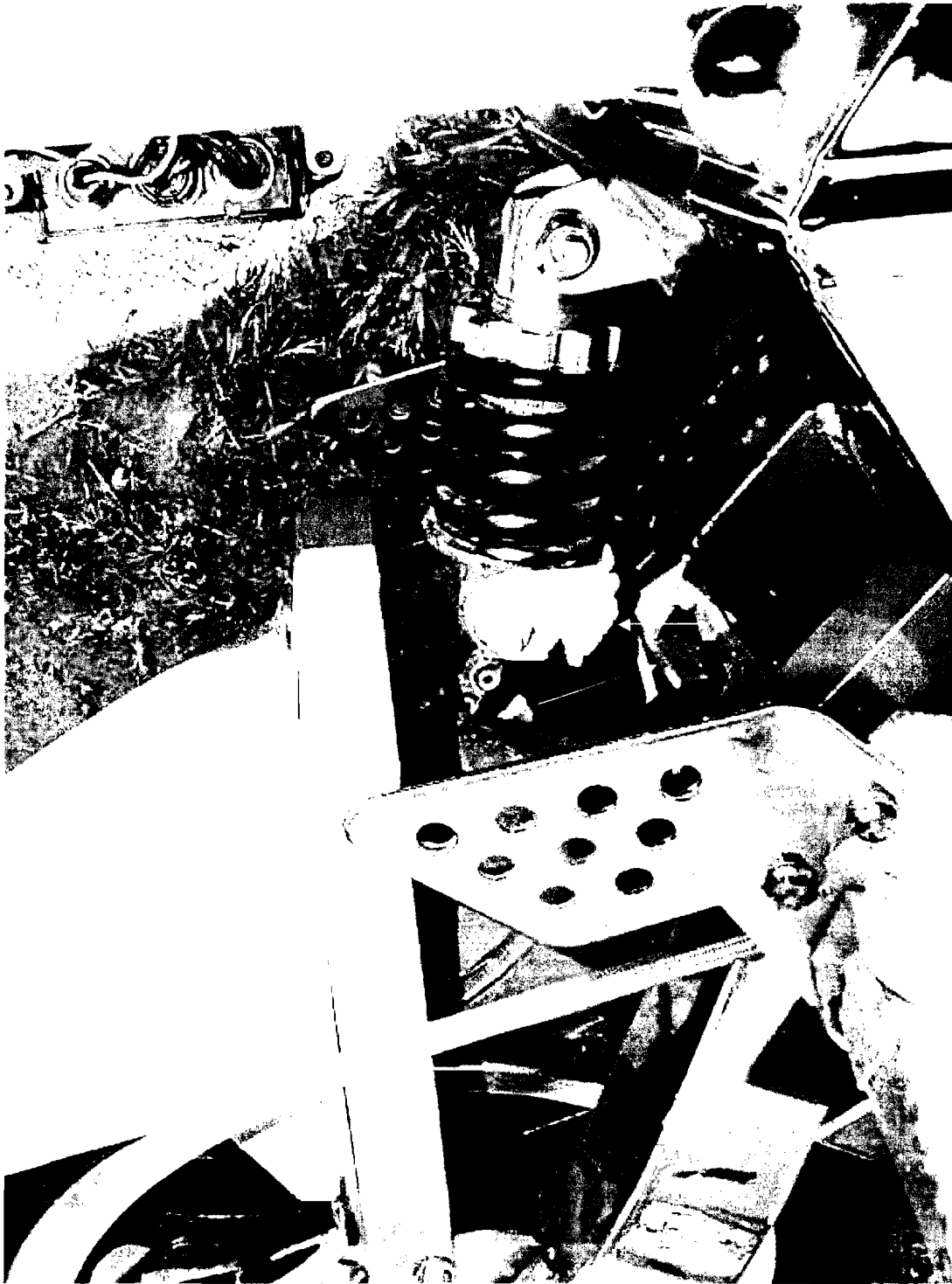
050909CCN0854 – Photo 4 – This photo shows another overall view of the motorbike.

Exhibit 1



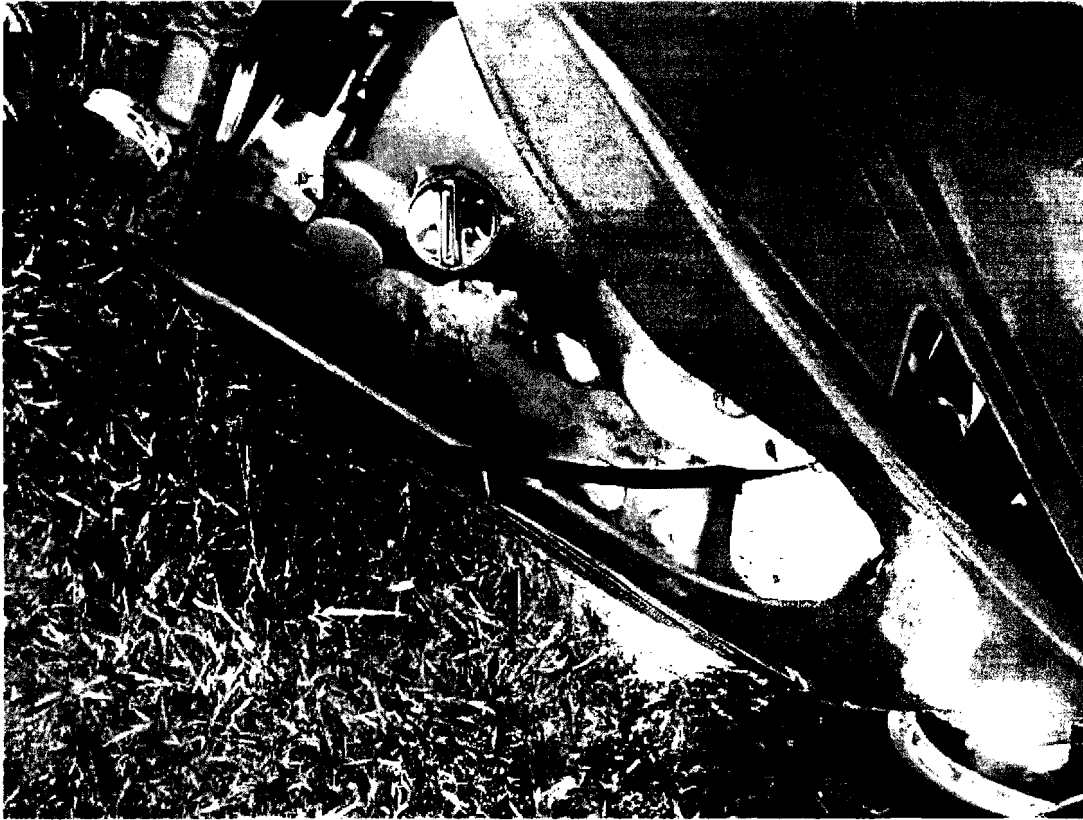
050909CCN0854 – Photo 5 – This photo shows a front view of the motor bike.

Exhibit 1



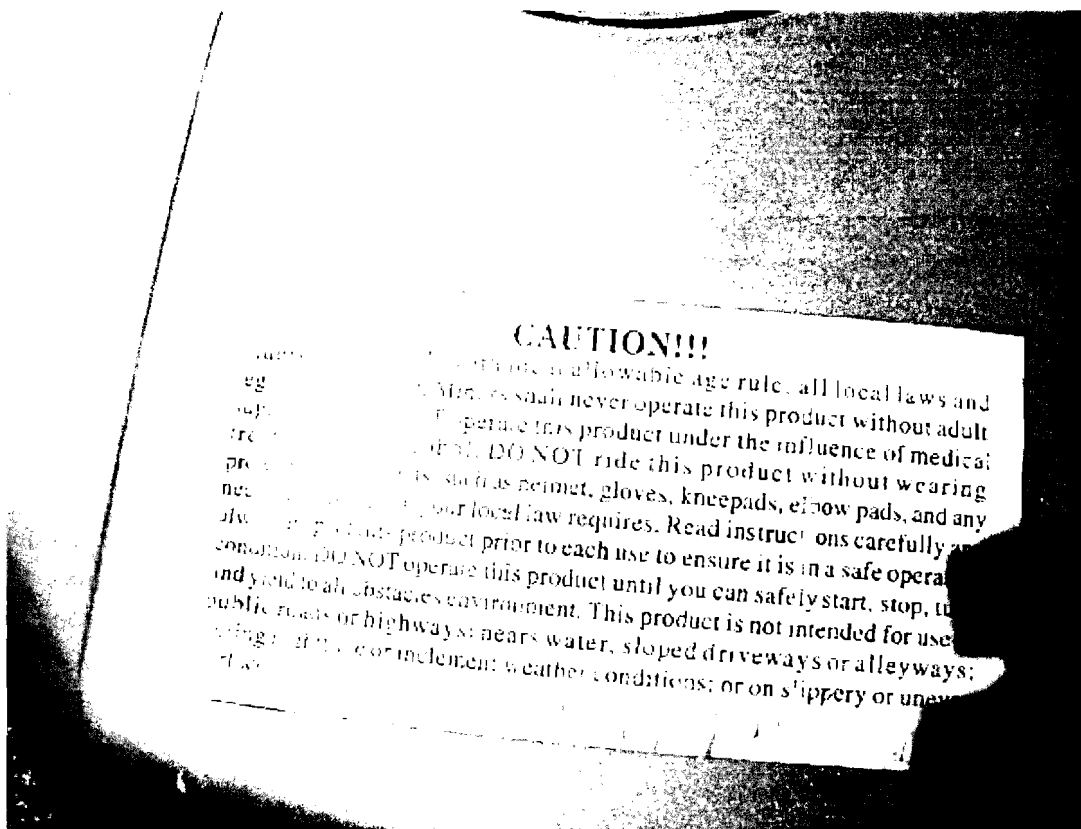
050909CCN0854 – Photo 6 – The arrows in the photo point to the area where the seat's shock absorber broke loose from the frame and then jammed into the rear wheel which caused the wheel to lock up.

Exhibit 1



050909CCN0854 – Photo 7 – This photo shows the gas line that was severed in the incident and allowed gasoline to spill onto the roadway shown in a previous photo.

Exhibit 1



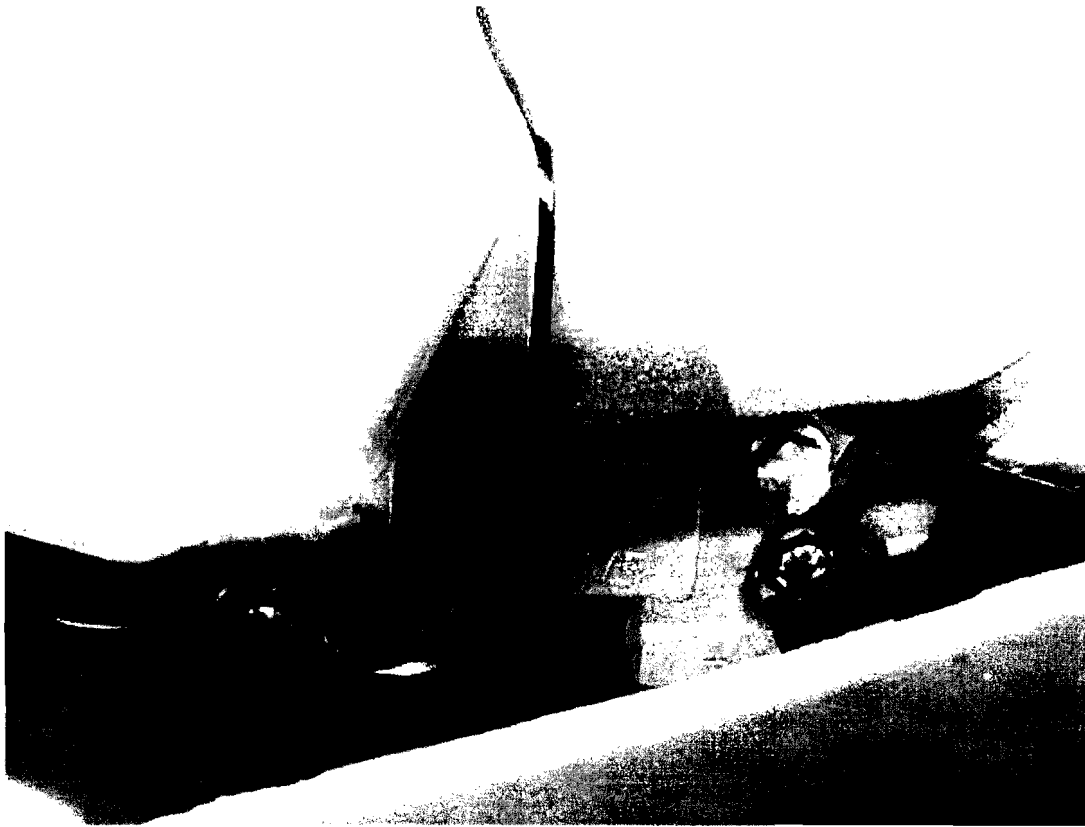
050909CCN0854 – Photo 8 – This photo shows a warning label noted on the motor bike.

Exhibit 1



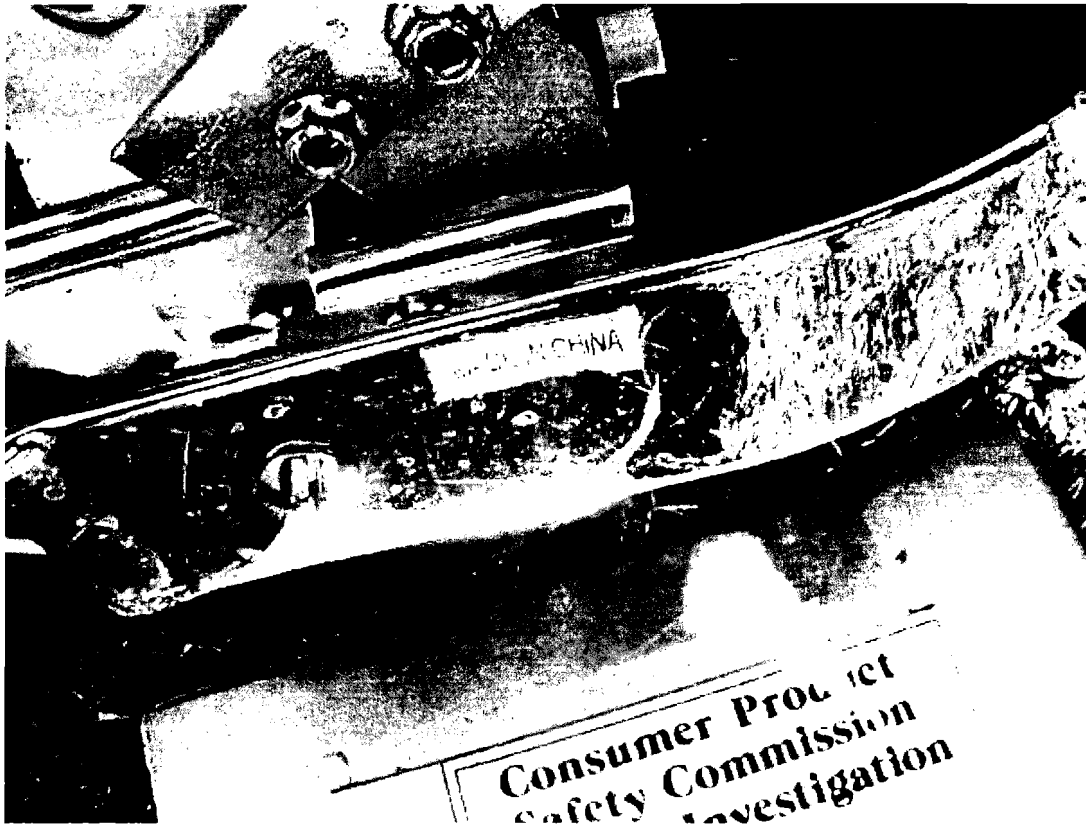
050909CCN0854 – Photo 9 - This photo shows the number “0884593” noted on the motor bike.

Exhibit 1



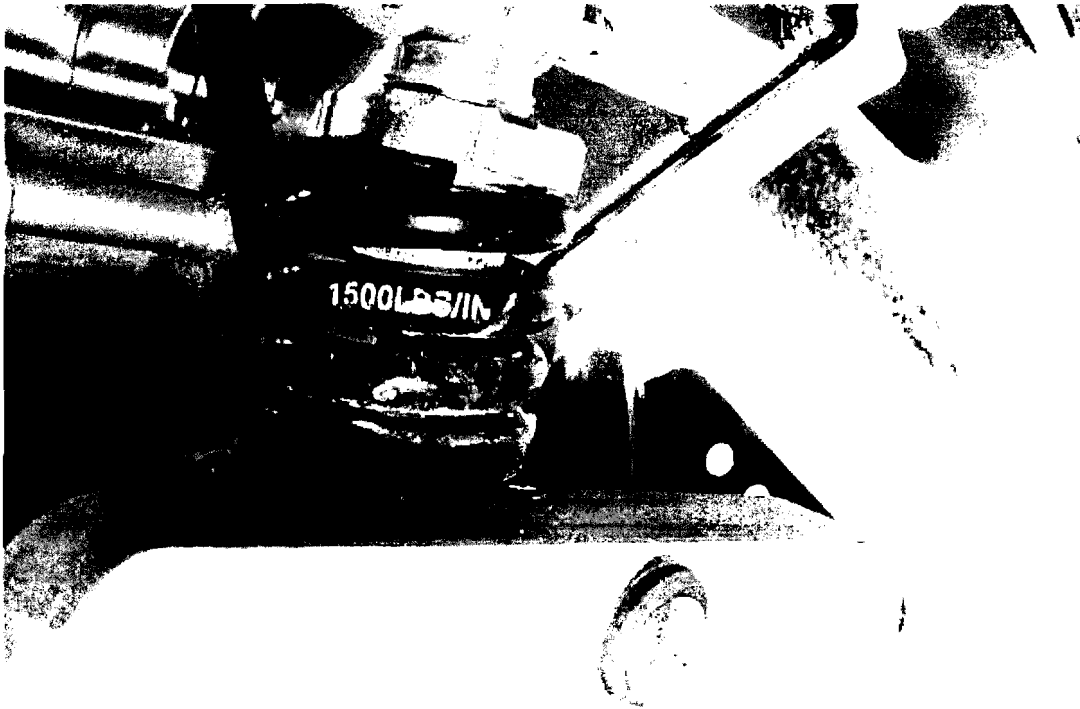
050909CCN0854 – Photo 10 – This photo shows the numbers “XY1P39FMB
0501001/5” on the motor bike.

Exhibit 1



050909CCN0854 – Photo 11 – This photo shows the label “MADE IN CHINA” on the motor bike.

Exhibit 1



050909CCN0854 – Photo 12 – This photo shows a close-up of the seats shock absorber that broke loose from the frame.

Exhibit 1



U. S. Consumer Product Safety Commission

050909CCN0854 Exhibit 2

AUTHORIZATION FOR RELEASE OF NAME

Thank you for assisting us in collecting information on a potential product safety problem. The Consumer Product Safety Commission depends on concerned people to share product safety information with us. We maintain a record of this information and use it to assist us in identifying and resolving product safety issues.

We routinely forward this information to manufacturers and private labelers to inform them of the involvement of their product in an accident situation. We also give the information to others requesting such about specific products. Manufacturers need the individual's name so that they can obtain additional information on the product or accident situation.

Would you please indicate on the bottom of this page whether you will allow us to disclose your name. If you ask that your name remain confidential, we will of course, honor that request.

After you have indicated your preference, please sign your name and date the document on the lines provided below.

You are hereby authorized to disclose my name and address with the information collected on this case.

My identity is to remain confidential.

James J. [Signature]
Signature

9-21-05
Date

371258

1. Task Number 061207CCC1156		2. Investigator's ID 9102		EPIDEMIOLOGIC INVESTIGATION REPORT
3. Office Code 810	4. Date of Accident YR MO DAY 2006 11 25	5. Date Initiated YR MO DAY 2006 12 07		
6. Synopsis of Accident or Complaint UPC				
<p>The mother of the 6 year old female and 23 month old female was allowing her children to drive a 50cc 4 wheel ATV out on the black top street in front of their home. The 6 year old stated the "gas got stuck" and she went 100 yards and across traffic and ran into the side of a concrete building. The older child received minor scratches and the younger female received a fractured jaw. Both were treated at a hospital.</p> <p style="text-align: center;"> <input checked="" type="checkbox"/> MER/EXCISE/RECALLED <input checked="" type="checkbox"/> COMMENTS YES <input checked="" type="checkbox"/> NO <input checked="" type="checkbox"/> OVERRULED <input checked="" type="checkbox"/> ATTACHED <input checked="" type="checkbox"/> EXCISE/RECALLED 2sc <small>REVISOR</small> <input checked="" type="checkbox"/> DO NOT RE-NOTIFY <input type="checkbox"/> RE-NOTIFY 7/16/07 </p>				
7. Location (Home, School, etc) 1 - HOME		8. City POMPANO BEACH		9. State FL
10A. First Product 3286 - All Terrain Vehicles (four W		10B. Trade/Brand Name SUNL VIN 05097367		10C. Model Number SLA-50
10D. Manufacturer Name and Address SUNL GROUP, INC. 8551 Esters Blvd Irving, TX 75063				
11A. Second Product 0		11B. Trade/Brand Name NONE		11C. Model Number NONE
11D. Manufacturer Name and Address NONE				
12. Age of Victim 223	13. Sex 1 - Male	14. Disposition 4 - Hospitalized	15. Injury Diagnosis 57 - Fracture	
16. Body Part(s) Involved 76 - FACE	17. Respondent 1 - Victim/Complainant	18. Type of Investigation 1 - On-Site	19. Time Spent (Operational Travel) 12 / 3	
20. Attachment(s) 9 - Multiple Attachments		21. Case Source 05 - Newspaper		22. Sample Collection Number
23. Permission to Disclose Name (Non NEISS Cases Only) <input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Verbal				
24. Review Date 01/26/2007	25. Reviewed By 9084		26. Regional Office Director Eric B. Ault	
27. Distribution Topka, Tanya			28. Source Document Number X06C0117A	

This investigation was initiated by a newspaper article received by the U.S. Consumer Product Safety Commission. Recent instructions from compliance regarding abbreviated ATV investigations were received after this investigation was nearly complete.

The information contained in this investigation was supplied by the following sources:

1. The police report on this incident.
2. A telephone interview with the mother of the victims on 12-28-2006.
3. An on-site visit to the area on 12-13-2006 and interview with unspecified witnesses to the incident.

Victim #1 – 23 month old male, height and weight unknown.

Victim #2 – 6 year old female, height and weight unknown.

This incident occurred close to the home of the mother of the victims on 11-25-2006, in Pompano Beach, FL. Information on the home was not relevant and not collected.

In approximately December of 2005, the mother of the victims purchased a new 50 cc mini/small ATV from an ATV dealer in Miami, FL. She could not remember the name of the location and was unable to locate a copy of the receipt of purchase.

The mother was very reluctant to discuss this incident and I was able to obtain only limited information. The mother stated that it was their custom to "drive" the mini ATV out in front of their home. She did not indicate the frequency or if the children had any training on the vehicle. She indicated that they were not wearing helmets or goggles. She did not indicate whether the product was stored in a protected area or outside in the weather.

The mother indicated that the vehicle would not take a charge and required a new battery, which had just recently been repaired. Otherwise the children had not been riding the vehicle for the past four months.

The police report indicates the following conditions at the time of the incident: the vehicle had no defects; the vehicle was traveling straight ahead; the area was primarily a business area; the road surface was dry, flat, paved and straight/level with no defects; the weather was clear and the driver's vision was not obscured, it was daytime and the lighting conditions were daylight.

The mother would not elaborate on the specifics prior to the incident but indicated that the 6 year old was driving and the 23 month old was a

passenger. She stated that the 6 year old told her after the incident that the "gas got stuck" and she was not able to stop the vehicle.

According to an anonymous witness at an auto repair shop located 100 yards down the road, at approximately 3:09 p.m., they saw a small ATV driving down the street towards their repair shop. He would not estimate how fast the child was driving the vehicle. The vehicle crossed five lanes of traffic, went across a flat grassy area, and struck a concrete block and stucco wall. Please see the photographs in the exhibits and the map in the police report.

The witness stated that the victim was very lucky that this incident occurred on a Saturday when the traffic along the main road was at a minimum. Normally the ATV would have struck a traveling vehicle.

The mother indicated that the 6 year old received only minor scratches and the 23 month old received a fractured jaw. Both children were transported to a local hospital and treated. The mother did not elaborate on the current condition of the children. The mother would not approve or sign a medical disclosure and medical records were not able to be obtained (Exhibit 7, Missing Document Form).

Attempts to obtain permission to photograph the unit at the impounded storage unit were unsuccessful. Attempts to get photographs of the unit from the police department were unsuccessful and they did not respond to phone calls or letters. The mother of the victims did not want her name released with copies of this report. Please see the form in the exhibits.

The web site for the manufacturer did not list a 50 cc ATV; however, I was able to find information on a 50 cc ATV on what appeared to be an alternate web site for the manufacturer. Please see exhibit #7. The age of the unit could not be determined. I called several ATV dealers for SUNL and they stated that they would be unable to determine any information on the unit based on the VIN number.

Product Information:

ATV:

SunL Group, Inc.

VIN: 05097367

8551 Esters Blvd

Irving, TX 75063

972-243-4555

972-243-0553 fax

www.SunL.com

Attachments:

Exhibit #1	Contacts
Exhibit #2	Police Report
Exhibit #3	Photographs of the scene (9)
Exhibit #4	Map of the area
Exhibit #5	Release of name form
Exhibit #6	Company Information
Exhibit #7	Missing Document Form (Med Disclosure & Medical Records)

Contacts:

12-13-2006

Just Tires & Auto Service Corp
601 NW 31ST AVE
POMPANO BEACH, FL 33069-5729
Phone: (954)974-4800

12-28-2006

Broward County Sheriff's Office
Evidence Section
2601 W. Broward Blvd
Ft. Lauderdale, FL 33312
954-831-6412
954-831-6218 fax

12-22-2006

Alica Frazier
3019 NW 6th St.
Pompano Beach, FL 33069

12-29-2006

Pompano Beach/Broward County Sheriff's Office
100 SW 3rd Street
Pompano Beach, FL 33060
(954) 786-4201
Officer Linquist

12-29-2006

Driscoll's Towing
1701 N. Dixie Hwy.
Pompano Beach, FL. 33060
954. 946.4747 (office)
954. 946.1820 (fax)

NW 27 Ave / NW 4th 1119

FLORIDA TRAFFIC CRASH REPORT

LONG FORM

MAIL TO: DEPT. OF HIGHWAY SAFETY & MOTOR VEHICLES, TRAFFIC CRASH RECORDS, NEIL KIRKMAN BUILDING, TALLAHASSEE, FL 32389-0500

DO NOT WRITE IN THIS SPACE

DATE OF CRASH: 11/25/06, TIME OF CRASH: 3:09 PM, TIME OFFICER NOTIFIED: 3:09 PM, TIME OFFICER ARRIVED: 3:11 PM, INVEST. AGENCY REPORT NUMBER: PB06-11-8056, HSMV CRASH REPORT NUMBER: 76128355. COUNTY: Broward, CITY OR TOWN: Pompano Beach, ON STREET, ROAD OR HIGHWAY: NW 31st Ave, AT THE INTERSECTION OF: NW 6th St.

SECTION 1

DRIVER ACTION: 3, MAKE: SUN, TYPE: 13, USE: 77, STATE: FL, VEHICLE IDENTIFICATION NUMBER: 05097367. TRAILER OR TOWED VEHICLE INFORMATION: None. VEHICLE TRAVELING: NW 6th St, AT: 25, POSTED SPEED: 25, EST. VEHICLE DAMAGE: \$200.00. MOTOR VEHICLE INSURANCE COMPANY: None. POLICY NUMBER: [blank]. VEHICLE REMOVED BY: 2. Name of vehicle owner: Alica Frazier, 3019 NW 6th St Pompano Beach FL, 33069. Name of driver: Desneschia Dennis, 3019 NW 6th St Pompano Beach FL, 33069. Driver license number: 5, RESULTS: N/A, ALC/DRUG: 1, PHYS. DEF: 1, RES: 1, RACE: 2, SEX: 1, INJ: 3, S. EQUIP: 0, EJECT: 1, 2. HAZARDOUS MATERIALS: 2, PLACARDED: 2, WAS HAZARDOUS MATERIAL SPILLED: 2, RECOMMENDED DRIVER RE-EXAM: 2, DRIVER'S PHONE NO: 954 691 5362.

SECTION 2

DRIVER ACTION: [blank], MAKE: [blank], TYPE: [blank], USE: [blank], STATE: [blank], VEHICLE IDENTIFICATION NUMBER: [blank]. TRAILER OR TOWED VEHICLE INFORMATION: [blank]. VEHICLE TRAVELING: [blank], AT: [blank], POSTED SPEED: [blank], EST. VEHICLE DAMAGE: [blank]. MOTOR VEHICLE INSURANCE COMPANY: [blank]. POLICY NUMBER: [blank]. VEHICLE REMOVED BY: [blank]. Name of vehicle owner: [blank], CURRENT ADDRESS: [blank], CITY AND STATE: [blank], ZIP CODE: [blank]. Name of owner: [blank], CURRENT ADDRESS: [blank], CITY AND STATE: [blank], ZIP CODE: [blank]. Name of motor carrier: [blank], CURRENT ADDRESS: [blank], CITY & STATE / ZIP CODE: [blank]. US DOT or ICC MC IDENTIFICATION NUMBERS: [blank]. Name of driver: [blank], CURRENT ADDRESS: [blank], CITY, STATE & ZIP CODE: [blank], DATE OF BIRTH: [blank]. Driver license number: [blank], STATE: [blank], DL TYPE: [blank], REQ. END: [blank], ALC/DRUG TEST TYPE: [blank], RESULTS: [blank], ALC/DRUG: [blank], PHYS. DEF: [blank], RES: [blank], RACE: [blank], SEX: [blank], INJ: [blank], S. EQUIP: [blank], EJECT: [blank]. HAZARDOUS MATERIALS: [blank], PLACARDED: [blank], IF YES, INDICATE NAME OR 4 DIGIT NUMBER FROM DIAMOND OR BOX ON PLACARD, AND 1 DIGIT NUMBER FROM BOTTOM OF DIAMOND: [blank], WAS HAZARDOUS MATERIAL SPILLED: [blank], RECOMMENDED DRIVER RE-EXAM: [blank], DRIVER'S PHONE NO: [blank].

Code Information table with columns: VEHICLE TYPE, VEHICLE USE, TRAILER TYPE, RESIDENCE (Driver / Ped.), PHYSICAL DEFECTS, ALCOHOL / DRUG USE, LOCATION IN VEHICLE, INJURY SEVERITY, SAFETY EQUIPMENT IN USE, EJECTED.

SECTION 3

DRIVER ACTION 1. Phantom 2. Hit & Run 3. N/A	YEAR	MAKE	TYPE	USE	VEH. LICENSE NUMBER	STATE	VEHICLE IDENTIFICATION NUMBER	<table border="1" style="font-size: 8px;"> <tr><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>7</td></tr> <tr><td>1</td><td>15</td><td>16</td><td>17</td><td>8</td><td></td></tr> <tr><td>14</td><td>13</td><td>12</td><td>11</td><td>10</td><td>9</td></tr> </table>	2	3	4	5	6	7	1	15	16	17	8		14	13	12	11	10	9	18. Undercarriage 19. Overturn 20. Windshield 21. Trailer
2	3	4	5	6	7																						
1	15	16	17	8																							
14	13	12	11	10	9																						
TRAILER OR TOWED VEHICLE INFORMATION		Trailer Type								SHOW FIRST POINT OF VEHICLE DAMAGE AND CIRCLE DAMAGED AREAS																	
VEHICLE TRAVELING ON		AT		Est. MPH	Posted Speed	EST. VEHICLE DAMAGE		EST. TRAILER DAMAGE	1. Disabling 2. Functional 3. No Damage																		
MOTOR VEHICLE INSURANCE COMPANY (LIABILITY OR PIP)					POLICY NUMBER		VEHICLE REMOVED BY:		1. Tow Rotation List 2. Tow Owner's Request 3. Driver 4. Other																		
NAME OF VEHICLE OWNER (Check Box If Same As Driver)				CURRENT ADDRESS (Number and Street)				CITY AND STATE		ZIP CODE																	
NAME OF OWNER (Trailer or Towed Vehicle)				CURRENT ADDRESS (Number and Street)				CITY AND STATE		ZIP CODE																	
NAME OF MOTOR CARRIER (Commercial Vehicle Only)				CURRENT ADDRESS (Number and Street)				CITY & STATE / ZIP CODE		US DOT or ICC MC IDENTIFICATION NUMBERS																	
NAME OF DRIVER (Taken From Drivers License) / PEDESTRIAN				CURRENT ADDRESS (Number and Street)				CITY, STATE & ZIP CODE		DATE OF BIRTH																	
DRIVER LICENSE NUMBER		STATE	OL TYPE	REQ. END.	ALC/DRUG TEST TYPE 1. Blood 3. Urine 5. None 2. Breath 4. Refused	RESULTS	ALC/DRUG	PHYS. DEF.	RES.	RACE	SEX	INJ.	S EQUIP.	EJECT													
HAZARDOUS MATERIALS BEING TRANSPORTED		PLACARDED		IF YES, INDICATE NAME OR 4 DIGIT NUMBER FROM DIAMOND OR BOX ON PLACARD, AND 1 DIGIT NUMBER FROM BOTTOM OF DIAMOND			WAS HAZARDOUS MATERIAL SPILLED?		RECOMMENDED DRIVER RE-EXAM, IF YES, EXPLAIN IN NARRATIVE		DRIVER'S PHONE NO.																

#	PROPERTY DAMAGE - OTHER THAN VEHICLES	EST. AMOUNT \$	OWNER'S NAME	ADDRESS	CITY	STATE	ZIP
1							
#	PROPERTY DAMAGE - OTHER THAN VEHICLES	EST. AMOUNT \$	OWNER'S NAME	ADDRESS	CITY	STATE	ZIP
2							

CONTRIBUTING CAUSES - DRIVER / PED	VEHICLE DEFECT	VEHICLE MOVEMENT	VEHICLE SPECIAL FUNCTIONS
01 No Improper Driving / Action 02 Careless Driving (Explain in Narrative) 03 Failed to Yield Right-of-Way 04 Improper Backing 05 Improper Lane Change 06 Improper Turn 07 Alcohol/Under Influence 08 Drugs-Under Influence 09 Alcohol & Drugs-Under Influence 10 Following Too Closely 11 Disregarded Traffic Signal 12 Exceeded Safe Speed Limit 13 Disregarded Stop Sign 14 Failed to Maintain Equip/Vehicle 15 Improper Passing 16 Drove Left of Center 17 Exceeded State Speed Limit 18 Obstructing Traffic	01 No Defects 02 Def. Brakes 03 Worn / Smooth Tires 04 Defective / Improper Lights 05 Puncture / Blowout 06 Steering Mech. 07 Windshield Wipers 08 Equipment / Vehicle Defect 77 All Other (Explain in Narrative)	01 Straight Ahead 02 Slowing / Stopped / Stalled 03 Making Left Turn 04 Backing 05 Making Right Turn 06 Changing Lane 07 Entering / Leaving / Parking Space 08 Properly Parked 09 Improperly Parked 10 Making U-Turn	1 None 2 Farm 3 Police Pursuit 4 Recreational 5 Emergency Operation 6 Construction / Maintenance 77 All Other (Explain in Narrative)
19 Improper Load 20 Disregarded Other Traffic Control 21 Driving Wrong Side / Way 22 Fleeing Police 23 Vehicle Modified 24 Driver Distraction (Explain in Narrative) 77 All Other (Explain in Narrative)	POINT OF COLLISION 1 On Road 2 Not On Road 3 Shoulder 4 Median 5 Turn Lane 77 All Other (Explain in Narrative)	PEDESTRIAN ACTION 01 Crossing Not at Intersection 02 Crossing at Mid-block Crosswalk 03 Crossing at Intersection 04 Walking Along Road With Traffic 05 Walking Along Road Against Traffic 06 Working on Vehicle in Road 07 Other Working in Road 08 Standing/Playing in Road 09 Standing in Pedestrian Island 77 All Other (Explain in Narrative) 88 Unknown	SOURCE OF CARRIER INFORMATION 1 Not Applicable 2 Shipping Papers 3 Vehicle Side 4 Driver 5 Other
WORK AREA 01 None 02 Nearby 03 Entered			LOCATION TYPE 1 Primary Business 2 Primary Residential 3 Open Country

FIRST / SUBSEQUENT HARMFUL EVENT (S)	ROAD SYSTEM IDENTIFIER	LIGHTING CONDITIONS
01 Collision With MV in Transport (Rear-end) 02 Collision With MV in Transport (Head-on) 03 Collision With MV in Transport (Angle) 04 Collision With MV in Transport (Left Turn) 05 Collision With MV in Transport (Right Turn) 06 Collision With MV in Transport (Side-swipe) 07 Collision With MV in Transport (Back Into) 08 Collision With Parked Car 09 Collision With MV on Roadway 10 Collision With Pedestrian 11 Collision With Bicycle 12 Collision With Bicycle (Bike Lane) 13 Collision With Moped 14 Collision With Train	01 Interstate 02 U.S. 03 State 04 County 05 Local 06 Turnpike / Toll 07 Forest Road 08 Private Property 77 All Other (Explain in Narrative)	01 Daylight 02 Dusk 03 Dawn 04 Dark (Street Light) 05 Dark (No Street Light) 88 Unknown
15 Collision With Animal 16 MV Hit Sign / Sign Post 17 MV Hit Utility / Light Pole 18 MV Hit Guard Rail 19 MV Hit Fence 20 MV Hit Concrete Barrier Wall 21 MV Hit Bridge / Pier / Abutment / Rail 22 MV Hit Tree / Scrubber 23 Collision With Construction Barricade Sign 24 Collision With Traffic Gate 25 Collision With Crash Attenuators 26 Collision With Fixed Object Above Road 27 MV Hit Other Fixed Object 28 Collision With Movable Object On Road	29 MV Ran Into Ditch / Culvert 30 Ran Off Road Into Water 31 Overturned 32 Occupant Fell from Vehicle 33 Tractor / Trailer Jackknifed 34 Fire 35 Explosion 36 Downhill Runaway 37 Cargo Loss or Shift 38 Separation of Units 39 Median Crossover 77 All Other (Explain in Narrative)	ROAD SURFACE/CONDITION 01 Dry 02 Wet 03 Slippery 04 Icy 77 All Other (Explain in Narrative)
ROAD CONDITIONS AT TIME OF CRASH	VISION OBSTRUCTED	TRAFFIC CONTROL
01 No Defects 02 Obstruction With Warning 03 Obstruction Without Warning 04 Road Under Repair / Construction 05 Loose Surface Materials 06 Shoulders - Soft / Low / High 07 Holes / Ruts / Unsafe Paved Edge 08 Standing Water 09 Worn / Polished Road Surface 77 All Other (Explain in Narrative)	01 Vision Not Obscured 02 Inclement Weather 03 Parked / Stopped Vehicle 04 Trees / Crops / Bushes 05 Load on Vehicle 06 Building / Fixed Object 07 Signs / Billboards 08 Fog 09 Smoke 77 All Other (Explain in Narrative) 10 Other	01 No Control 02 Special Speed Zone 03 Speed Control Sign 04 School Zone 05 Traffic Signal 06 Stop Sign 07 Yield Sign 08 Flashing Light 09 Railroad Signal 10 Officer / Guard / Flagperson 11 Posted No U - Turn 77 All Other (Explain in Narrative)
		SITE LOCATION 01 Not At Intersection / RR'ing / Bridge 02 At Intersection 03 Influenced By Intersection 04 Driveway Access 05 Railroad 06 Bridge 07 Entrance Ramp 08 Parking Lot - Public 09 Parking Lot - Private 10 Private Property 11 Private Property 12 Toll Booth 13 Public Bus Stop Zone 77 All Other (Explain in Narrative)
		TRAFFIC WAY CHARACTER 1 Straight - Level 2 Straight - Upgrade / Downgrade 3 Curve - Level 4 Curve - Upgrade / Downgrade TYPE SHOULDER 1 Paved 2 Unpaved 3 Curb

Violator (s)	SECTION #	NAME OF VIOLATOR	FL STATUTE NUMBER	CHARGE	CITATION NUMBER
	SECTION #	NAME OF VIOLATOR	FL STATUTE NUMBER	CHARGE	CITATION NUMBER
	SECTION #	NAME OF VIOLATOR	FL STATUTE NUMBER	CHARGE	CITATION NUMBER
	SECTION #	NAME OF VIOLATOR	FL STATUTE NUMBER	CHARGE	CITATION NUMBER

FLORIDA TRAFFIC CRASH REPORT
NARRATIVE / DIAGRAM

MAIL TO: DEPARTMENT OF HIGHWAY SAFETY & MOTOR VEHICLES, TRAFFIC CRASH
RECORDS SECTION, NEK KIRKMAN BUILDING, TALLAHASSEE, FL 32309-0500

DO NOT WRITE IN THIS SPACE

TIME EMS NOTIFIED (FATALITIES ONLY) <input type="checkbox"/> AM <input type="checkbox"/> PM	TIME EMS ARRIVED (FATALITIES ONLY) <input type="checkbox"/> AM <input type="checkbox"/> PM	DATE OF CRASH 11 25 06	COUNTY / CITY CODE 10/72	INVEST. AGENCY REPORT NUMBER PB06-11-8056	HMSV CRASH REPORT NUMBER 76128355
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(NARRATIVE)

Witness advised that vehicle 1, which is a recreation type four wheel vehicle was traveling west bound on NW 6th Ave. The vehicle continued traveling westbound across NW 31st Ave and struck a wall on the west side of NW 31st Ave. The passenger of the vehicle was air lifted to Broward General Hospital.

The driver of the vehicle was transported by Fire Rescue 52 to North Broward Hospital.

The passanger was transported by Air 85 to Broward General Hospital.

SEC#	PASS#	PASSENGER'S NAME	CURRENT ADDRESS	CITY & STATE	ZIP CODE	DATE OF BIRTH	RACE	SEX	LOC	INJ	S. EQUIP.	EJECT
1	1	Desie Frazier				12/09/04	2	1	9	3	0 0	2
SEC#	PASS#	PASSENGER'S NAME	CURRENT ADDRESS	CITY & STATE	ZIP CODE	DATE OF BIRTH	RACE	SEX	LOC	INJ	S. EQUIP.	EJECT
SEC#	PASS#	PASSENGER'S NAME	CURRENT ADDRESS	CITY & STATE	ZIP CODE	DATE OF BIRTH	RACE	SEX	LOC	INJ	S. EQUIP.	EJECT
SEC#	PASS#	PASSENGER'S NAME	CURRENT ADDRESS	CITY & STATE	ZIP CODE	DATE OF BIRTH	RACE	SEX	LOC	INJ	S. EQUIP.	EJECT
SEC#	PASS#	PASSENGER'S NAME	CURRENT ADDRESS	CITY & STATE	ZIP CODE	DATE OF BIRTH	RACE	SEX	LOC	INJ	S. EQUIP.	EJECT
SEC#	PASS#	PASSENGER'S NAME	CURRENT ADDRESS	CITY & STATE	ZIP CODE	DATE OF BIRTH	RACE	SEX	LOC	INJ	S. EQUIP.	EJECT

Violator (s)	SECTION #	NAME OF VIOLATOR	FL STATUE NUMBER	CHARGE	CITATION NUMBER
	SECTION #	NAME OF VIOLATOR	FL STATUE NUMBER	CHARGE	CITATION NUMBER

WITNESS NAME (1) James Wagner	CURRENT ADDRESS 1580 NE 30th Pl	CITY & STATE Oakland Park Florida	ZIP CODE 33334	WITNESS NAME (2)	CURRENT ADDRESS	CITY & STATE	ZIP CODE	
FIRST AID GIVEN BY - NAME Pompano Beach Fire Rescue	1. Physician or Nurse 2. Paramedic or EMT 3. Police Officer 4. Certified 1st Aider 5. Other	INJURED TAKEN TO: North Broward Hospital/Broward General	BY - NAME Rescue 52 / Air 85	2				
WAS INVESTIGATION MADE AT SCENE 1. YES 2. NO	IF NO, THEN WHERE? 1	IS INVESTIGATION COMPLETE 1. YES 2. NO	IF NO, THEN WHY? 1	DATE OF REPORT 11 25 06	PHOTOS TAKEN 1. YES 2. NO	1	IF YES, BY WHOM? 1. INVESTIGATING AGENCY 2. OTHER	1
INVESTIGATOR'S RANK & SIGNATURE <i>Lindquist</i>	ID / BADGE NUMBER 13979	DEPARTMENT Broward County Sheriff's Office	FHP	SO	PD	OTHER		

934-786-4201

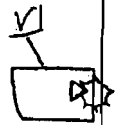
DIAGRAM

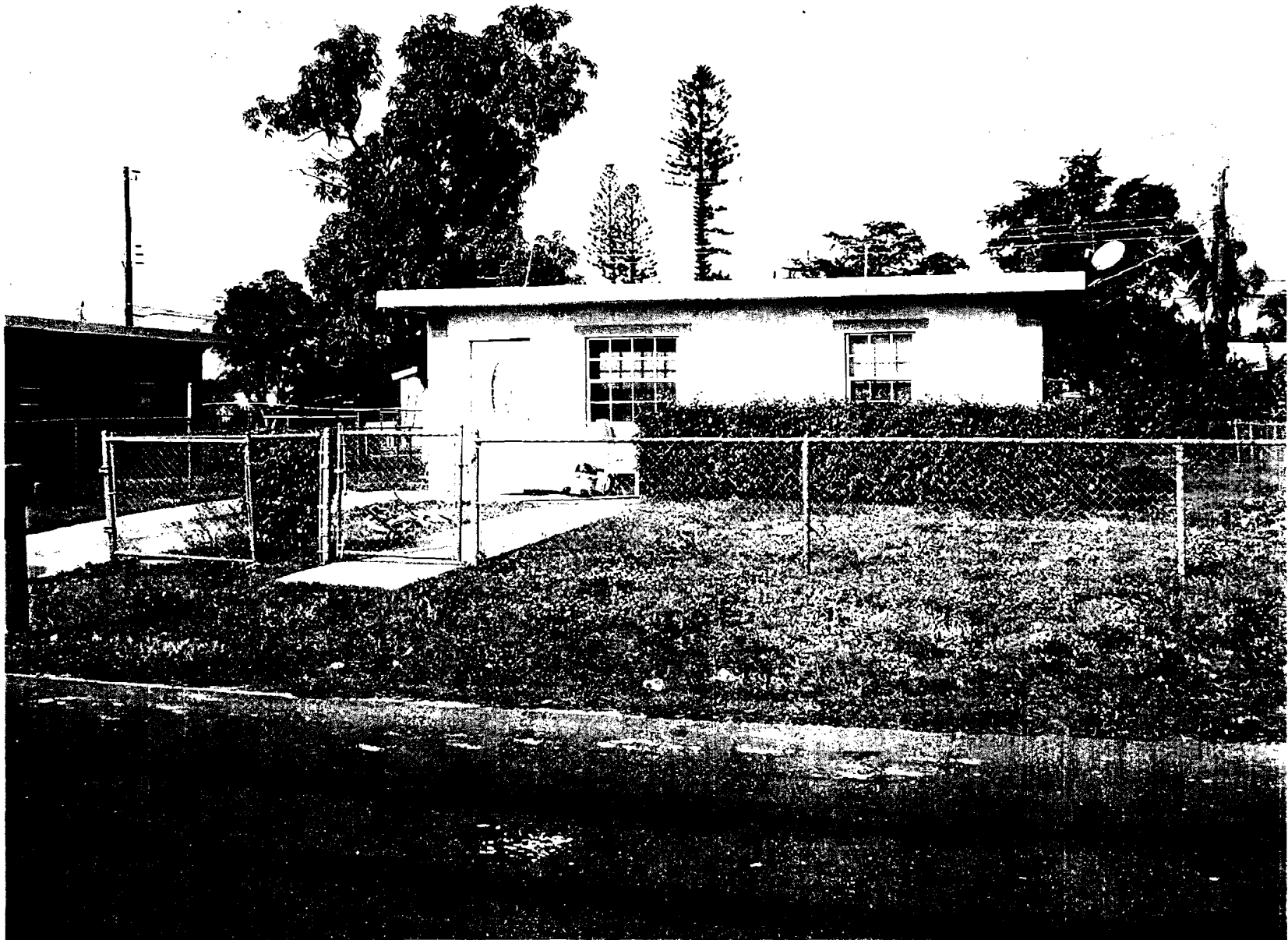


INDICATE NORTH
WITH ARROW

↑
Nw 31 Ave
↓

← Nw Q St →





Photograph of the front of the home.



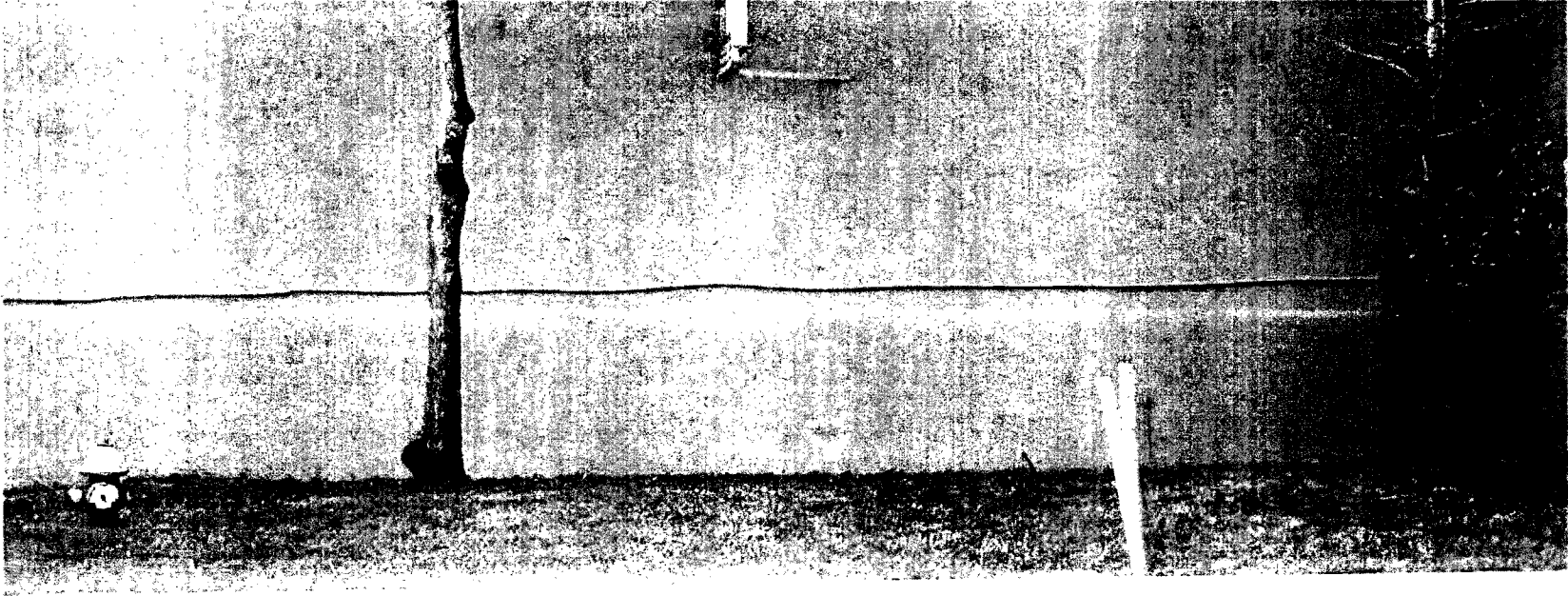
Photograph looking toward the struck building.



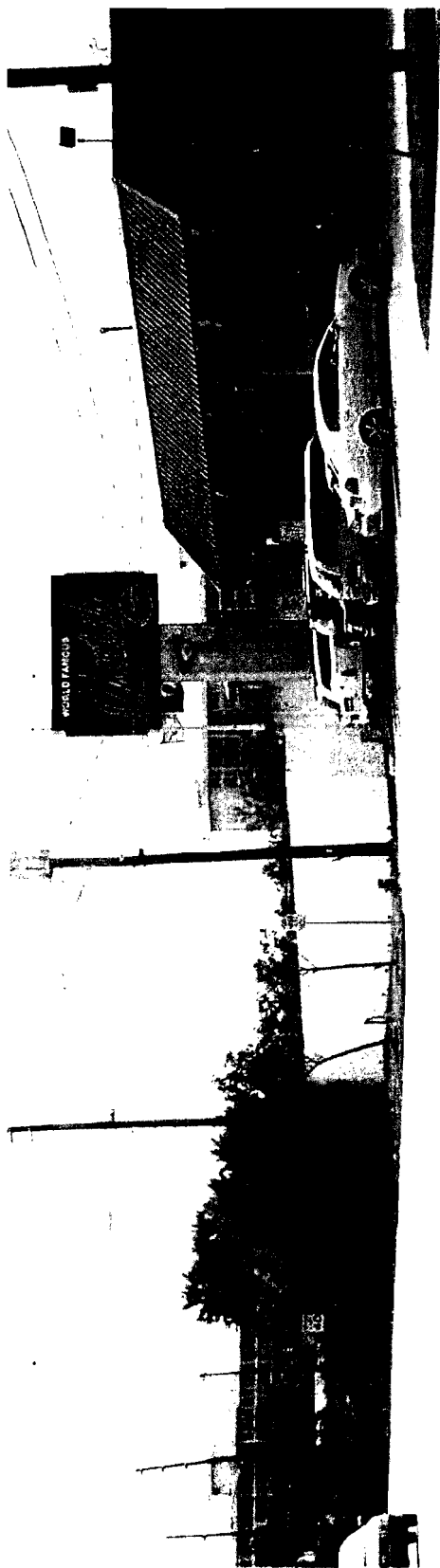
Close up of the above photograph.



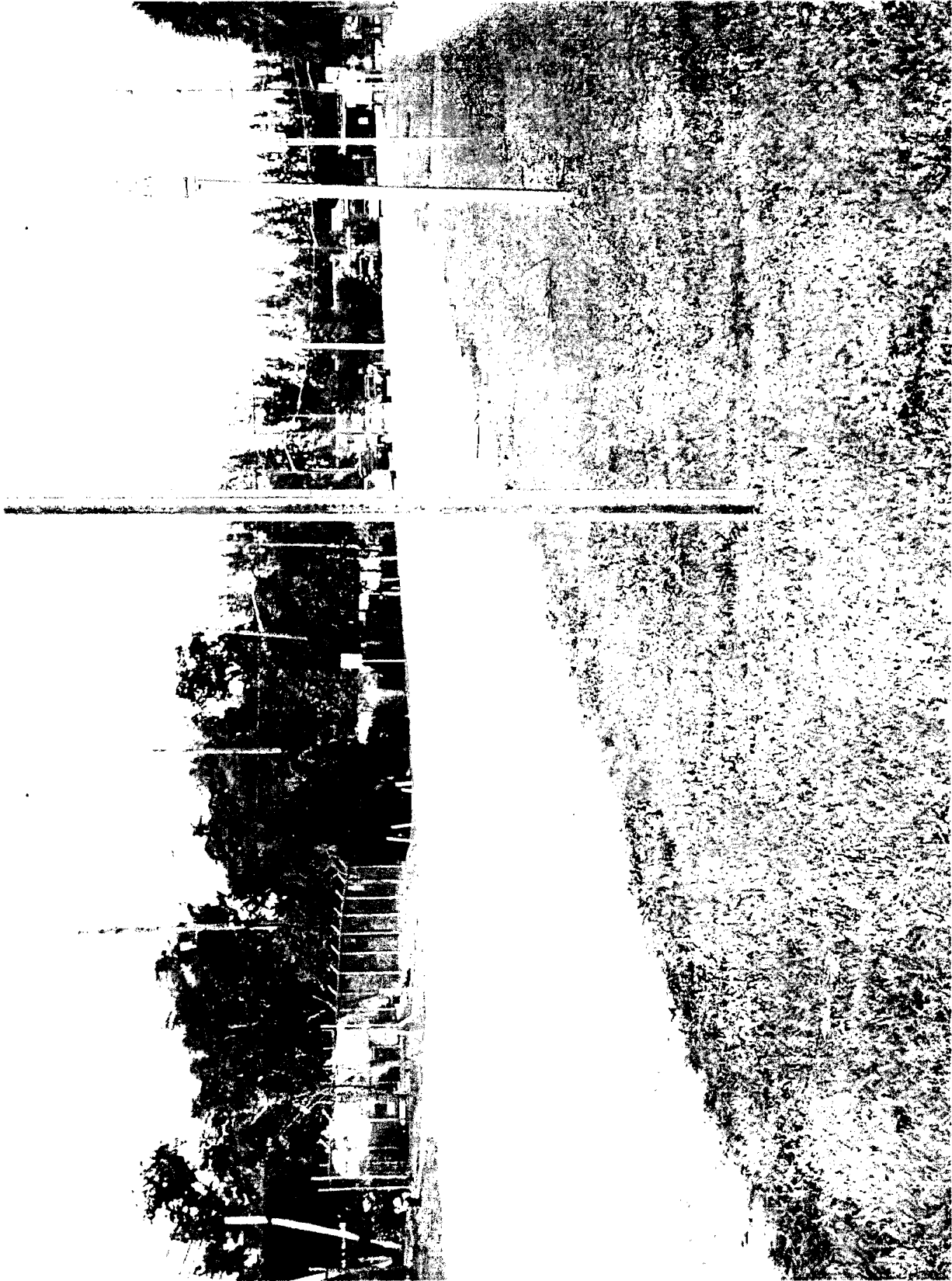
Close up of the above photograph.



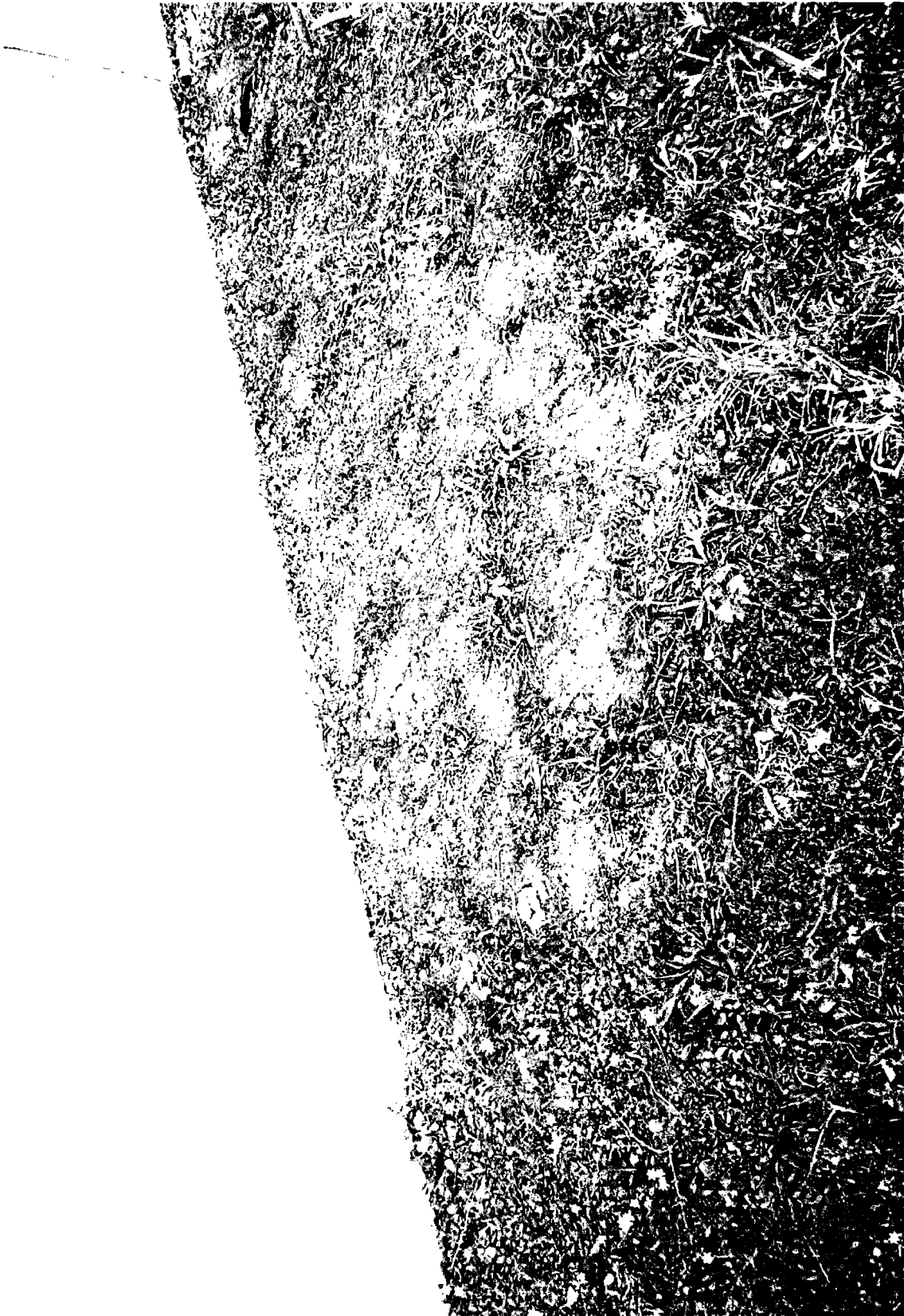
Close up of the above photograph. The yellow circle on the building by the police department indicates the point of impact,



Photograph looking South down the 5 lanes of traffic.




Photograph looking North up the 5 lanes of traffic.



Close up photograph of the point of contact.




Photograph looking back towards the origination point.

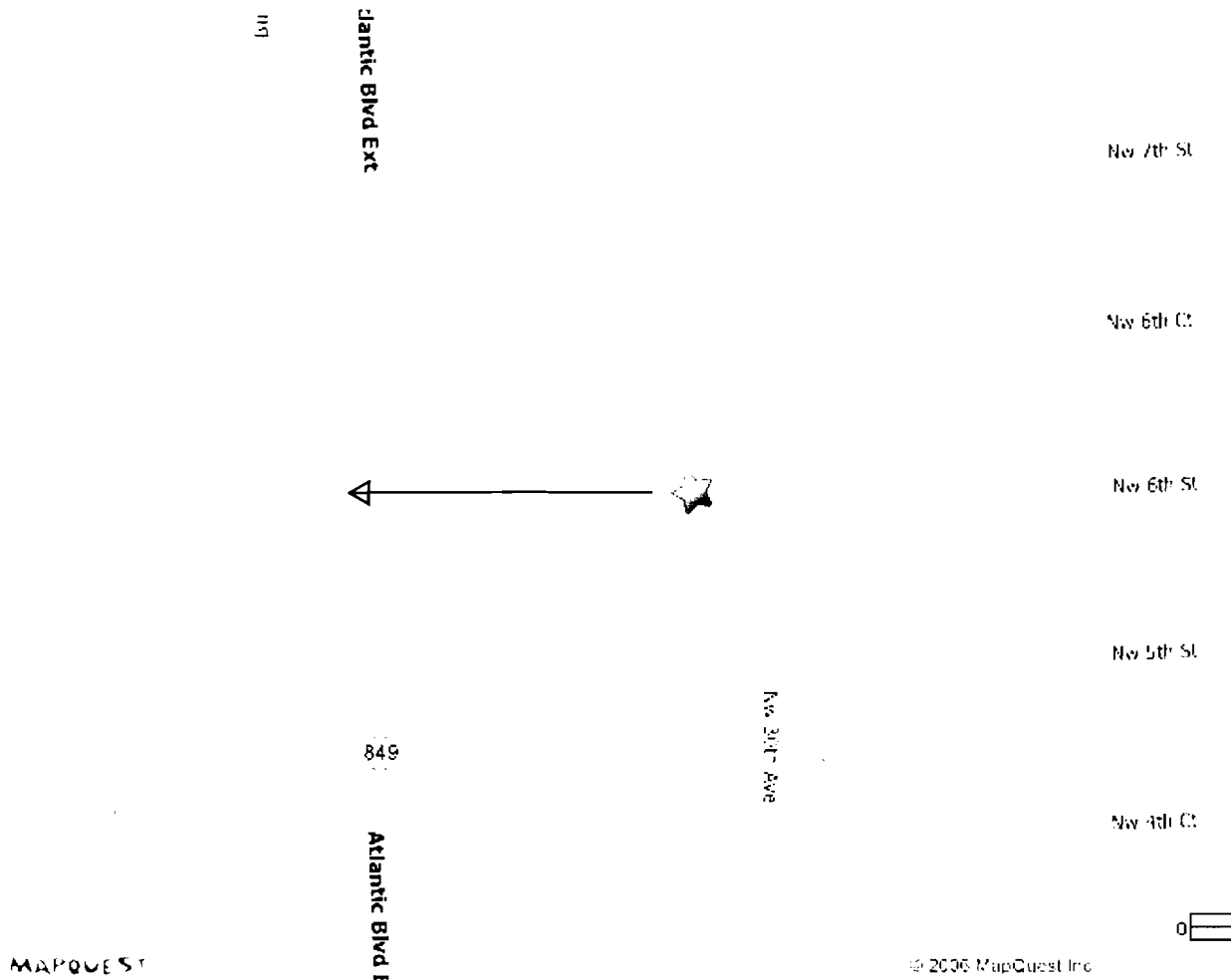
 **Sorry!** When printing directly from the browser your map may be incorrectly cropped. To print the entire map, try clicking the **"Printer-Friendly"** link at the top of your results page.

MAPQUEST

☆ 3019 Nw 6th St

Pompano Beach, FL 33069-2123, US

 **Sorry!** When printing directly from the browser your map may be incorrectly cropped. To print the entire map, try clicking the **"Printer-Friendly"** link at the top of your results page.



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

U. S. CONSUMER PRODUCT SAFETY COMMISSION

AUTHORIZATION FOR RELEASE OF NAME

Thank you for assisting us in collecting information on a potential product safety problem. The U. S. Consumer Product Safety Commission depends on concerned people to share product safety information with us. We maintain a record of this information, and use it to assist us in identifying and resolving product safety problems.

We routinely forward this information to manufacturers and distributors to inform them of the involvement of their product in an incident situation. We also give the information to others requesting information about specific products or hazards. Manufacturers may need the individual's name so that they can obtain additional information on the product or incident situation.

Would you please indicate on the bottom of this page whether you will allow us to disclose your name. If you request that your name remain confidential, we will of course, honor that request. After you have indicated your preference, please sign your name and date the document on the lines provided.

YES

NO

(Signature)

(Date)

By Phone

12-28-2006



Home

Online Retailers

Dealer Inquiry

Help

Contact

Customer Login

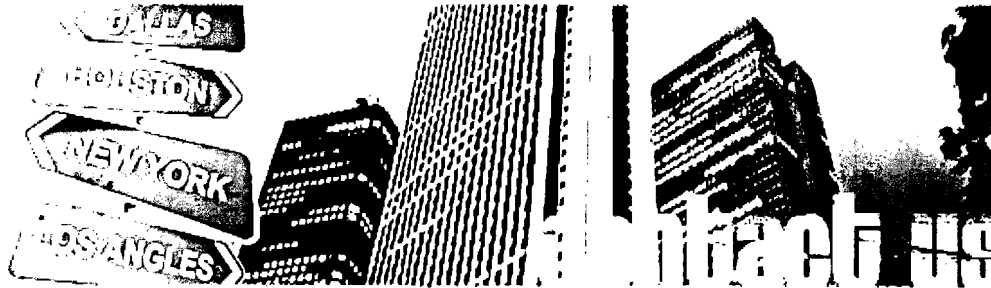
Checkout

motorcycle

atv

scooter

utility



8551 Esters Blvd
Irving, Tx 75063
Tel:972-243-4555
Fax:972-243-0553
1-866-423-1072

District Sales Managers

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Patrick@sunl.com
Brad@sunl.com
Derrick@sunl.com

15801 E. Valley Blvd ,
City of industry, CA 91744

Tel: 626-369-4555

5601 Bonhomme Road
Houston, TX 77036-2001

Tel: 713-784-4888
Fax: 713-784-8883
Toll Free: 1-866-784-4888

Sales Department

Sales: houston@sunl.com
Tina S: tina@sunl.com
Wady R: wady@sunl.com

83 Mayfield Avenue
Edison, New Jersey 08837

Tel:732-346-1234

Fax: 626-369-4488
Toll Free: 1-800-605-7865

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Luis: Luis@sunl.com

Irene: Irene@sunl.com

Accounting Department
Janet: janet@sunl.com
Christy: Christy@sunl.com

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Toll-free:1(866) 610-sunl (7865)
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bpena@sunl.com
972-243-4555 x 204


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Lupe: Guadalupe@sunl.com x220
Jennifer: jennifer@sunl.com x202

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Toll Free: 1-888-550-0400

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Toby : toby@sunl.com

18-H International Convention &
Exhibition Centre, No.168 Baizhang
Road,Ningbo,China


Tel: +86-574-87739280
Fax: +86-574-87739285
Jack Yu: jack@sunl.com



Access Wholesale Bikes >>>

FRANCHISING DEALER LOCATION DEALER

HOME COMPANY CATALOG TRADE SHOW NEWS/ITEMS IMG CONTACT



SEARCH

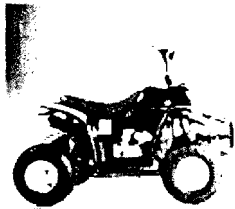
- MY ACCOUNT
- SHOPPING CART
- TECHNICAL SUPPORT
- RMA REQUEST

001-Red



1

 ADD TO CART



REVIEWS

ADD TO CART

Exhibit #7
GLD

Task No.: 061207CCC1156

STATUS OF MISSING DOCUMENT

The purpose of this record is to notify the reader that the following document(s), which is/are missing from this report, will not be collected.

1. Medical Records Disclosure

2. Medical Records

3. _____

The investigator indicates in the report that he/she requested a copy of the above listed document(s), but the document(s) was/were not yet available when the investigation report was completed. The investigator intended to forward the document(s) for attachment to this report when the requested material was obtained.

The investigator has made numerous attempts, since the original request, to collect a copy of the requested document(s) but has not been successful. Because of the problems associated with the collection of this material and our limited investigation resources, no additional efforts will be made to collect the missing document(s).

We apologize for any inconvenience the missing data may cause you.

Date: January 26, 2007

Investigator No.: 9102

Regional Office: CFIE

Supervisor No.: 9084