

and safety. The company stands behind its products, and in the unlikely event a customer has a problem with his or her Manitou 2 or M-Sport suspension fork crown, Answer Products will provide a remedy. Below, we describe the remedial steps we already have taken to address this situation. See No. 12.

In his letter, Mr. Schoem requested that we provide the information specified in 16 C.F.R. § 1115.13(d) and certain additional information. To assist with the reporting, Answer Products sets forth the full text of the applicable provision of 16 C.F.R. § 1115.13(d) or paragraph from Mr. Schoem's letter together with its response.

1. 16 C.F.R. § 1115.13(b)(1): The name address, and title of the person submitting the "full report" to the Commission.

RESPONSE: Edward A. Cole, President/C.O.O., Answer Products, Inc., 17460 Avenue Scott, Valencia, California 91355; telephone number (805) 257-4411, Ext. 235.

2. 16 C.F.R. § 1115.13(b)(2): The name and address of the manufacturer (or importer) of the product and the addresses of the manufacturing plants for that product.

RESPONSE: Answer Products, Inc., 27460 Avenue Scott, Valencia, California 91355, is the assembler and distributor of Manitou 2 and M-Sport suspension forks. The foregoing is the address for Answer Products' plant.

3. 16 C.F.R. § 1115.13(b)(3): An identification and description of the product(s). Give retail prices, model numbers, serial numbers, and date codes. Describe any identifying marks and their location on the product. Provide a picture or a sample of the product.

RESPONSE: The Manitou 2 suspension forks involved are: (1) the 1992-93 Manitou 2 mountain bike suspension fork, retail price \$395 and (2) the 1992-93 M-Sport mountain bike suspension fork, retail price \$269. The 1992-93 Manitou 2 and M-Sport mountain bike suspension fork crowns at issue were made between July 1, 1992, and December 20, 1992.

A picture of the Manitou 2 mountain bike suspension fork is contained on pages 8-9 of the enclosed Answer Products' 1993 Mountain Bike Accessory Catalog. A picture of the M-Sport 1992-93 mountain bike suspension fork appears on page 14 of the enclosed catalog. Copies of the Owner's Manuals for the Manitou 2 and M-Sport suspension forks also

are enclosed. These manuals describe the suspension forks and contain relevant drawings. Four sample suspension forks are being sent under separate cover: a) a Manitou 2 suspension fork with a crown having a .10 inch wall thickness; b) a Manitou 2 suspension fork with a crown having a .15 inch wall thickness; c) a M-Sport suspension fork with a crown having a .10 inch wall thickness; and d) a M-Sport suspension fork with a crown having a .15 inch wall thickness.

4. 16 C.F.R. § 1115.13(b)(4): A description of the nature of the defect, failure to comply, or risk. If technical drawings, test results, schematics, diagrams, blueprints, or other graphic depictions are available, attach copies.

RESPONSE: A small percentage of Manitou 2 and M-Sport mountain bike suspension fork crowns in use may develop cracks after extended use. The suspension fork crown is the part holding the legs of the front fork in place. It connects the wheel to the bicycle's handlebars and frame. If any cracks in the crown go undetected and the fork's use continues, the cracks in the crown may lead to the possibility of the fork and wheel separating during use. Separation during use could result in the rider falling,

leading to physical injuries. Answer Products believes that most cracks will be easily detected and reported.

Between July 1, 1992, and December 20, 1992, Answer Products incorporated 23,587 fork crowns into its Manitou 2 and M-Sport suspension forks. Of this number, Answer Products believes that less than 1,000 of the aluminum crowns were machined from possibly discrepant materials. Answer Products' fork crown specifications called for the extrusion material to have a yield strength of 35,000 pounds per square inch and a tensile strength of 42,000 pounds per square inch. Fork crowns machined from the possibly discrepant material may fall below the required strength levels. A few crowns returned to Answer Products appear to have been made from non-conforming softer material.

Answer Products believes that less than 1,000 fork crowns were machined from possibly discrepant material based on several factors. Answer Products' supplier of extrusion material has informed it that about 5% of the extrusion material may have fallen below Answer Products' hardness or strength requirements. Also, the possible problem was not initially detected through Answer Products random sampling of extrusion materials. This random sampling involved the random testing for hardness of extrusion materials.

Answer Products has enclosed copies of the engineering drawings of the fork crowns. The drawings include "Revision C". The revision calls for an increased wall thickness in the crown pocket area from .100 inches to .150 inches. All forks made after December 20, 1992, incorporated the thicker crowns. None of the thicker crowns has been returned with cracks. The revision was made as a precautionary measure before Answer Products could isolate the problem related to the cracked crowns.

5. 16 C.F.R. § 1115.13(b)(5): The nature or the injury or the possible injury associated with the product defect, failure to comply, or risk.

RESPONSE: The suspension fork crown holds the legs of the bicycle's front fork in place. It connects the wheel to the bicycle's handlebars and frame. Cracks in the crown may lead to the possibility of fork and wheel separating during use. Minor physical injuries could result if the rider lost control of the bicycle. Answer Products has received notice of four incidents of alleged personal injury, and is enclosing materials relating to these claims. See paragraph No. 15(d) below.

6. 16 C.F.R. § 1115.13(b)(6): The manner in which and the date when the information about the defect, noncompliance, or risk (e.g., complaints, reported injuries, quality control testing) was obtained. If any complaints related to the safety of the product or any allegations or reports of injuries associated with the product have been received, copies of such complaints or reports (or a summary thereof) shall be attached. Give a chronological account of facts or events leading to the report under section 15(b) of the CPSA, beginning with receipt of the first information which ultimately led to the report. Also included may be an analysis of these facts or events.

RESPONSE: After noticing that a few crowns used by racers in late November or early December of 1992 had developed small stress cracks it was felt that the cause was that the parts were made from a small amount of extrusion that was possibly not fully heat treated and thus would not have full mechanical properties. As a precautionary measure and to gain a wider margin of safety, the wall thickness of the crown was increased in the crown pocket from .10 inches to .15 inches. (Drawing Rev. C). Crowns machined after December 20, 1992 had an increased wall thickness. During

subsequent months any crown that was returned from the field with cracks was replaced by our warranty department.

Following a claim made by a customer in January, 1994, we received a .10 inch thick crown which purportedly had separated completely on a M-sport fork. The crown was given to our engineering department to perform a failure analysis. This failure analysis was completed in early April, 1994 and showed that the crown was made from material that possibly was not properly heat treated. Answer Product's Controller, Keith Goldman, who was copied on the failure analysis report, noticed the similarity of the incident of a crown failing to several other claims he had received since January, 1994. At that time, management was advised that this situation should be looked into further.

7. 16 C.F.R. § 1115.13(b)(7): The total number of products and units involved.

RESPONSE: As discussed above, Answer Products estimates that less than 1,000 of 23,587 fork crowns are involved. Answer Products incorporates by reference as though fully stated herein the discussion set forth in paragraph No. 4 above.

8. 16 C.F.R. § 1115.13(b)(8): The dates when products and units were manufactured, imported, distributed, and sold at retail.

RESPONSE: Answer Products believes the suspension fork crowns, at issue were assembled between August 1, 1992, and December 20, 1992. The suspensions were distributed between approximately September 1, 1992, and approximately March 1, 1993, and have been sold at retail since about September 15, 1992, until the present.

9. 16 C.F.R. § 1115.13(b)(9): The number of products and units in each of the following: in the possession of the manufacturer or importer, in the possession of private labelers, in the possession of distributors, in the possession of retailers, and in the possession of consumers.

RESPONSE: Answer Products presently does not possess any of the suspension forks intended for resale. Further, Answer Products does not believe that any of its distributors possess any of the suspension forks in stock. Answer Products does not know how many of the suspension forks at issue are in the possession of retailers or consumers.

10. 16 C.F.R. § 1115.13(b)(10): An explanation of any changes (e.g., designs, adjustments, and additional parts, quality control, testing) that have been or will be effected to correct the defect, failure to comply, or risk and of the steps that have been or will be taken to prevent similar occurrences in the future together with the timetable for implementing such changes and steps.

RESPONSE: Answer Products increased the wall thickness in the fork crown's pocket area from 0.100 inches to 0.150 inches. The suspension fork crown designed was changed around December 20, 1992. Answer Products has not seen any failures of the thicker fork crowns. Enclosed is a copy of the Engineering Drawing Revision showing the design change. In addition, Answer Products has taken the action described below in paragraph 11.

11. 16 C.F.R. § 1115.13(b)(11): Information that has been or will be given to purchasers, including consumers, about the defect, noncompliance, or risk with a description of how this information has been or will be communicated. This shall include copies or drafts of any letters, press releases, warning labels, or other written information that

has been or will be given to purchasers, including consumers.

RESPONSE: On June 27, 1994, Answer Products sent the enclosed product notice to all its dealers and distributors. Also enclosed is a notice sent to dealers and distributors to be given or sent to any known customers. All dealers or retailers are asked to post the enclosed notice in conspicuous places as well as visually inspect all crowns in use for presence of cracks. Retailers are asked to remove and replace any crowns/steerers if any cracks are visually evident. Answer Products also plans to contact directly purchasers who returned warranty cards and is creating a mailing database to accomplish this task. Answer Products will pay all costs associated with removal, replacement, and shipping of any allegedly cracked crowns.

12. 16 C.F.R. § 1115.13(b)(12): The details of and schedule for any contemplated refund, replacement, or repair actions, including plans for disposing of returned products (e.g., repair, destroy, return to foreign manufacturer).

RESPONSE: The planned replacement policy is described in paragraph 11. Answer Products has requested that crowns be returned to it for analysis and will pay costs associated with removal, replacement, and shipping. After analysis,

Answer Products plans to destroy all cracked or discrepant crowns.

13. 16 C.F.R. § 1115.13(b)(13): A detailed explanation and description of the marketing and distribution of the product from the manufacturer (including importer) to the consumer (e.g., use of sales representatives, independent contractors, and/or jobbers; installation of the product, if any, and by whom).

RESPONSE: Answer Products is the assembler and distributor of the Manitou forks. Answer sells these products both domestically and Internationally. Domestically Answer Products sells through Independent Bicycle Dealers who then sell to the end consumer. Answer Products uses inside Telesales to contact these Dealers. Answer has no outside sales force or distribution in the U.S. We currently have approximately 2,300 Bicycle Dealers who we deal with. The product is in most cases installed by a bicycle mechanic at the Dealer. In some limited cases the fork may be installed by the end consumer.

Internationally we use distributors in each country to reach the Bicycle Dealer. We currently deal with approximately .

45 Export customers who would have purchased Manitou 2 and M Sport suspension forks during this time period .

Answer Products sold a percentage of the forks built during this period to several bicycle makers who then be installed the fork as original equipment on their bicycles.

14. 16 C.F.R. § 1115.13(b)(14): Upon request, the name and address of all distributors, retailers, and purchasers, including consumers.

RESPONSE: Answer Products will compile this information and provide it at the specific request of the CPSC. Answer Products considers this information to be confidential trade secret and commercial information exempt from public disclosure pursuant to 5 U.S.C. § 552(b)(4)

15. 16 C.F.R. § 1115.13(b)(15): Such further information necessary or appropriate to the functions of the Commission as is requested by the staff.

RESPONSE: In paragraphs 15(a) through 15(g), Mr. Schoem, director, Division of Corrective Actions, requested additional materials and information. The following addresses Mr. Schoem's request for additional information.

To assist the reporting process, Answer Products sets forth the full text of the applicable paragraph of Mr. Schoem's letter together with its response.

15a. Copies of all test reports, analysis, and evaluations, including premarket tests and reports of tests and any analysis related to the reported problem. Include the date and place such tests and analysis were conducted by or on behalf of the firm and the identity of the persons involved in the testing and analysis. Please specify why only 1,000 units of the 23,587 distributed are defective and provide documentation.

RESPONSE: In connection with paragraph No. 4 above, we discuss that less than 1,000 of the crowns at issue may have been made from possibly discrepant material. We incorporate by reference the discussion contained in paragraph No. 4 as though it were fully stated herein. Answer Products has extrusion material tested during the production process based on a random sampling method. Answer Products also has tested cracked crowns returned to it. Enclosed with this letter are copies of test reports relating to the crown extrusion material at issue. Also, enclosed with this letter is a report of the United States Testing Company, Inc., relating to 16 C.F.R. 1512, Subchapter C, showing that

the Manitou 2 style suspension forks met the federal "Requirements for Bicycles."

15b. Copies of all engineering drawings, engineering change notices and material specifications relevant to the identified problem.

RESPONSE: In December, 1992, Answer Products changed the wall thickness of the fork crown from .10 inches to .15 inches. Answer Products has received no complaints regarding the thicker crowns. A rough stress analysis was performed to compare the .10 inch wall section to the revised .15 inch wall section. Engineering drawing showing the design changes together with notes concerning the stress analysis are enclosed.

15c. The identity of the person(s) who identified the potential problem, and date he/she identified the problem, any persons they notified, and the date of notification.

RESPONSE: Answer Products incorporates by reference as though fully stated herein the discussion set forth in our answer to question No. 6 above.

15d. Concerning the information specified by 16 C.F.R. § 1115.13(d)(6), please include a copy of all safety related consumer or dealer complaints, warranty claims, reports of injury, and copies of all documents related to such complaints, claims and injuries. Please include copies of all court complaints and related documents filed in or associated with lawsuits involving the product and a description of the resolution of those lawsuits, if any.

RESPONSE: Answer Products has received information regarding four incidents concerning alleged personal injuries. We have included documents regarding these claims. Since August 1, 1993, Answer Products has replaced 192 Manitou 2 style crowns due to cracks. All of these crowns are believed to involve discrepant extrusion material and had a wall thickness of .10 inches. No crowns with .15 inch thick walls have been returned. Answer Products has enclosed a listing of all warranty returns related to cracked crowns in its current computer system data base. Previous warranty history is recorded on handwritten sheets and can be compiled on request.

15e. Provide two samples of the product, including retail packaging and instructions for assembly and use. Also

provide a sample of the "fix", if such has been made, with instructions to be given to consumers. If there is a cost associated with these samples, notify us prior to sending the samples.

RESPONSE: Samples of the .10 inch thick crowns and the current .15 inch thick crowns are being sent under separate cover. Owner's manual are included. See paragraph No. 4, above.

15f. A copy of the firm's catalog depicting the product.

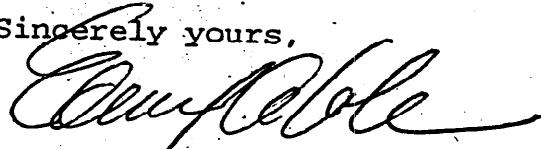
RESPONSE: Enclosed is a copy of Answer Products' 1993 Mountain Bike Accessory Catalog. This catalog depicts the product at issue and is discussed in paragraph No. 3, above.

15g. What plans does your firm have regarding corrective action and/or notification to dealers and consumers.

RESPONSE: We already have described in paragraphs 10-12 above the corrective action planned and taken.

In conclusion, we emphasize Answer Products commitment to the quality of its products, to the public and to safety. We hope this letter provides the information required by the CPSC. If you have any questions, please do not hesitate to contact me.

Sincerely yours,



Edward A. Cole
President/C.O.O.

IMPORTANT NOTICE

DEALERS, PLEASE READ IMMEDIATELY

JUNE 29, 1994

Re: 1992-93 Answer Manitou 2 Mountain Bike Suspension Forks
1992-93 Answer M-Sport Mountain Bike Suspension Forks

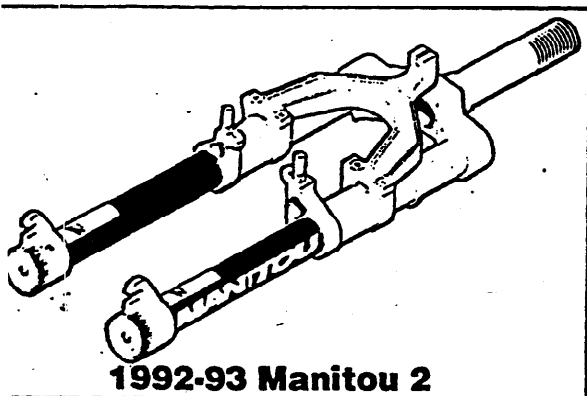
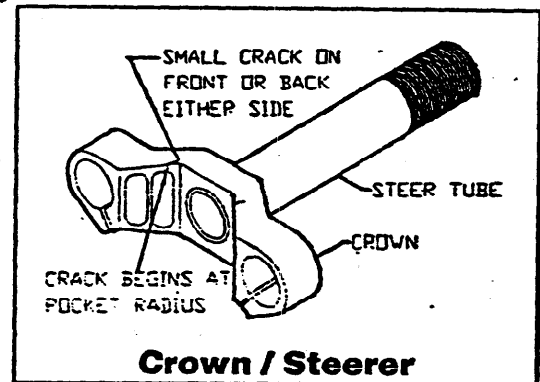
Dear Manitou Retailer,

Answer Products has found that a small percentage of the 1992-93 season Manitou 2 and M-Sport fork crowns may develop cracks during use. Therefore, we are requesting that all of these forks be visually inspected by our Dealers for cracks and the crowns replaced if necessary. Manitou 1, Manitou 3, and Manitou Sport '94 forks are not subject to this inspection.

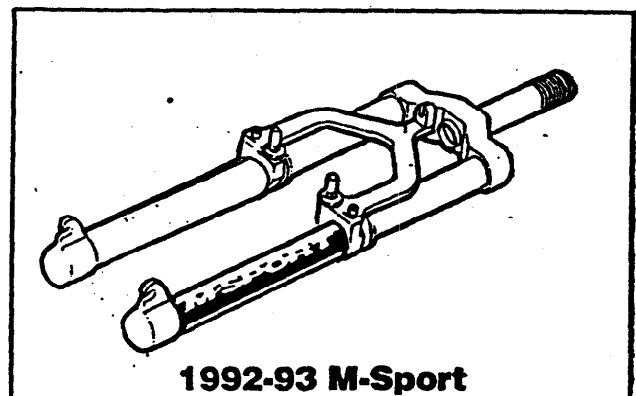
The cracks in the crown are the result of a small percentage of defective material that was used in the manufacture of the crowns. The cracks, if present, are plainly visible from the outer surface of the fork crown and require no disassembly to see. If cracks have developed and the fork continues to be used, the cracks may grow to a point where the crown may fail, completely separating the fork from the bicycle. This situation would result in loss of control of the bicycle with risk of physical injury to the rider.

We request that you please:

1. Notify all known purchases and owners to STOP USING THE MANITOU 2 AND '92 M-SPORT FORKS IMMEDIATELY UNTIL THE CROWN CAN BE INSPECTED by the individual or by Shop Personnel if necessary. If any cracks are apparent, then the crown must be removed and Answer will replace the crown at No Charge to the dealer or the consumer.
2. Post the enclosed notice in your store(s) in a conspicuous place.
3. Visually inspect all crowns in use for presence of cracks in the areas noted in Fig. 1.
4. Remove and replace crown / steerers if any cracks are visually evident.
5. Send the cracked crown / steerer to ANSWER PRODUCTS, 27460 AVENUE SCOTT, VALENCIA, CA 91355. (Do not send the entire fork, just the crown/steerer) Write "DEFECTIVE CROWN" on the package for quick identification and turn-around. It will be replaced at No Charge.



1992-93 Manitou 2



1992-93 M-Sport

Consumer Notice

Please Post

IMPORTANT NOTICE

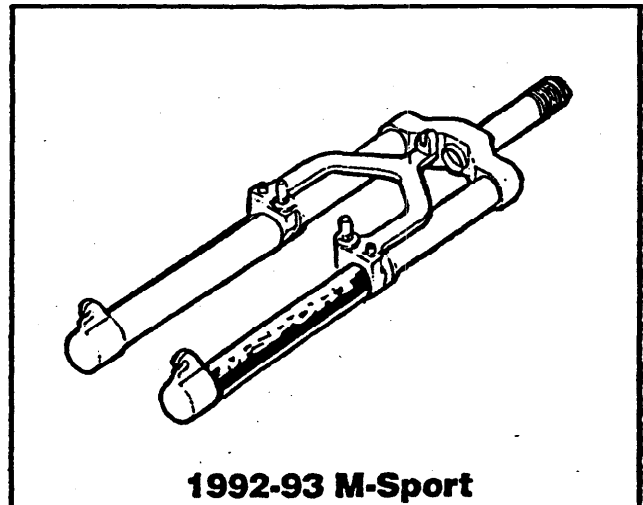
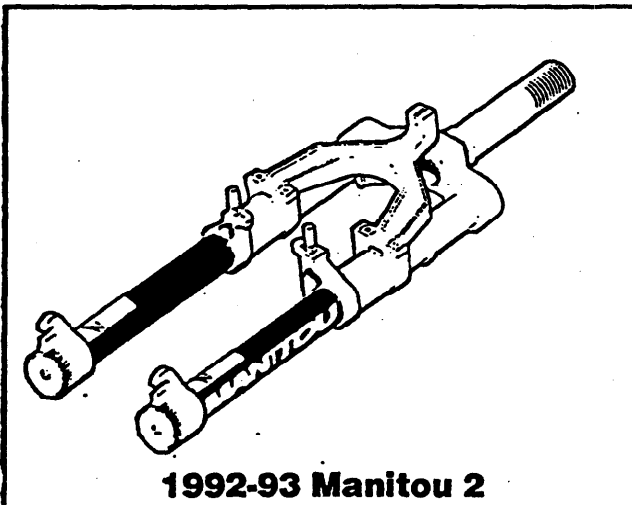
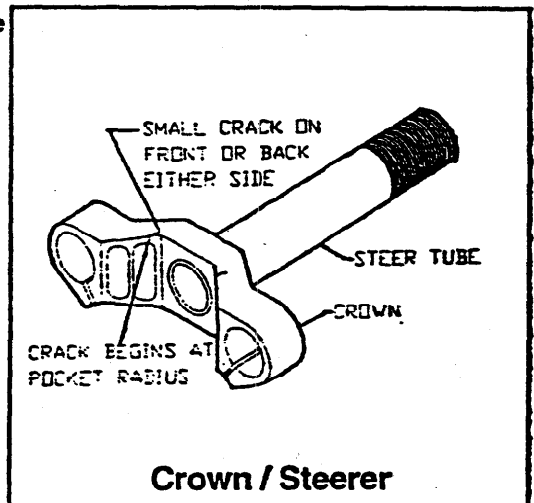
JUNE 29, 1994

Re: 1992-93 Answer Manitou 2 Mountain Bike Suspension Forks
1992-93 Answer M-Sport Mountain Bike Suspension Forks

Answer Products has found that a small percentage of the 1992-93 season Manitou 2 and M-Sport fork crowns may develop cracks during use. Therefore, we are requesting that all of these forks to be visually inspected by a Manitou fork Dealer for cracks and the crowns replaced if necessary. Manitou 1, Manitou 3, and Manitou Sport '94 forks are not subject to this inspection.

The cracks in the crown are the result of a small percentage of defective material that was used in the manufacture of the crowns. The cracks, if present, are plainly visible from the outer surface of the fork crown and require no disassembly to see. If cracks have developed and the fork continues to be used, the cracks may grow to a point where the crown may fail, completely separating the fork from the bicycle. This situation would result in loss of control of the bicycle with risk of physical injury to the rider.

If you own a Manitou 2 or 1992-93 M-Sport fork, either visually inspect your own crown for cracks in the locations noted in Fig. 1, or have your authorized dealer visually inspect your crown prior to your next ride. If any cracks are apparent, then the crown must be removed and Answer will replace the crown at No Charge to the dealer or the customer. For further information, please contact your dealer or Answer's Warranty Dept. at (800) 423-0273, Ask for Ext. 201.



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***C. CPSC TEST
RESULTS***

***D. MATERIAL
TEST RESULTS
(ACCEPTABLE)***

***E. MATERIAL
TEST
REPORTS
(NOT
ACCEPTABLE)***

A. FAILURE ANALYSIS

**B. HARDNESS
INSPECTION
OF RETURNED
CROWNS**

5-4-94

CRACKED CROWNS

HARDNESS TESTED - B SCALE -

- 1. 1/4" M2 THIN WALL 28-34 SOFT
- 2. 1/8" M2 THIN WALL 34-38
- 3. 1" M2 THIN WALL 26-40 SOFT
- 4. 1" M2 THIN WALL 22-38 SOFT
- 5. 1" M2 " " 22-36 SOFT
- 6. 1" M2 " " 20-30 SOFT

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