

FILE

CPSA Sec 3(2)(1)

Sarlo



Power Lawn Mowers

U.S. CONSUMER PRODUCT SAFETY COMMISSION

293

WASHINGTON, D. C. 20207

SEP 3 1982

OFFICE OF THE GENERAL COUNSEL

Comments Processed

withholding throughout

James F. Rill, Esquire
Collier, Shannon, Rill & Scott
Attorneys-at-Law
1055 Thomas Jefferson Street, N.W.
Washington, D.C. 20007

Dear Mr. Rill:

This is in **response** to your letter of August 27, 1982, concerning the request of Sarlo Power Mowers, Inc., ("Sarlo") for an advisory opinion regarding the status of their highwheel power lawn mowers as **consumer** products, as defined in 15 U.S.C. § 2052(a)(1). In an earlier exchange of correspondence, we advised you that the information available to us as of August 18, 1982, was insufficient to determine whether these mowers were consumer products.

In your more recent letter, you explain that Sarlo does not believe that it would be able to obtain sufficient information to establish that its mowers are not used more than occasionally by consumers. Accordingly, you ask for an indication of how the Commission would view a

[REDACTED]

If Sarlo's proposed marketing system operates as intended, no mowers of that model designation would be sold to or used by consumers, and mowers of that model would not be consumer products. Thus, such mowers would not have to comply with the safety standard for walk-behind power lawn mowers. Of course, if Sarlo manufactures other mowers that would be used more than occasionally by consumers, those other mowers must comply with the standard.

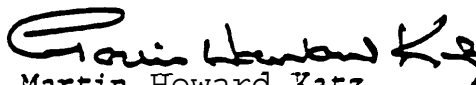
ADVISORY OPINION

Page 2
James F. Rill

We would also suggest that Sarlo include **sufficient** checks in its marketing system to ensure that the system operates as intended, since our determination could change if **informat**ion showing more than **occasional** use by consumers becomes available. --

While the views expressed in this letter are based upon the most current interpretation of the law by this office, they could subsequently be changed or superseded by the Commission. **Please** do not hesitate to contact **me** if you have further questions regarding these matters.

Sincerely,


Martin Howard Katz
General Counsel

Collier, Shannon, Rill & Scott

Attorneys - at - Law

1055 Thomas Jefferson Street, N. W.

Washington, D. C. 20007

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Thomas P. Shannon
James P. Rill
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August 27, 1982

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David L. Dick
Michele A. Giusiana
David P. Hackett
Judith L. Oldham

Walter Flowers
William P. Fox, Jr.
William D. Appler
Of Counsel

Martin Katz, Esquire
General Counsel
Consumer Product Safety Commission
5401 Westbard Avenue
Bethesda., Maryland 20207

Dear Mr. Katz:

Sarlo Power Mowers, Inc., was extremely disappointed with your response to their July 21, 1982 request for an advisory opinion regarding the commercial status of their highwheel products. Sarlo believes that both its-product and its sales and distribution patterns are identical to those of its competitors who have received opinions that their products are commercial mowers and are, therefore, excluded from the Safety Standard for Walk-Behind Mowers.

Sarlo's request included very specific information, painstakingly assembled, as to the disposition of at least- of its products. Yet, you have concluded that the amount of information submitted is insufficient because Sarlo presented no records with respect to of its sales, representing single-unit transactions, and failed to identify or precisely quantify the retail purchases from the, as well as the nature and level of rental transactions.

Sarlo has concluded that it' is not possible to obtain precise information in each of these areas sufficient to satisfy your request with respect to purchasers' identities or precise percentages of consumer versus commercial users. An exhaustive search in this regard would consume valuable time and money and is unlikely to yield sufficient additional information. At the same time, it would be extremely unfair to Sarlo if, as a result of the Commission's decision, it were forced to relinquish its share of the commercial highwheel market to its competitors who have received favorable opinions and are able to supply non-complying units as requested by commercial establishments and

Martin Katz, Esquire
August 27, 1982
Page Two

Collier, Shannon, Rill & Scott

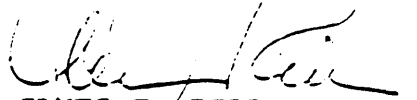
governmental entities. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] The production of specially designated non-complying machines, [REDACTED]

[REDACTED] should satisfy your requirement that Sarlo "control **or document** its channels of distribution in such a way as to assure that the mowers in question are not sold to **or** used by consumers more than occasionally." No orders for such units would be **filled for purchasers other than** [REDACTED]
[REDACTED]

Sarlo requests your immediate **consideration** of this **proposal** so that it may continue to compete in this limited segment of the **highwheel** market. Please contact us if we can provide additional information to expedite this **matter** in any way.

Sincerely;



JAMES F. RILL
Attorney for Sarlo Power
Mowers, Inc.

JFR/eam



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

18 AUG 1982

OFFICE OF THE
GENERAL COUNSEL

James F. Rill, Esq.
Collier, Shannon, Rill 6: Scott
Attorneys-at-Law
1055 Thomas Jefferson Street, N.W.
Washington, D. C. 20007

Dear Mr. Rill:

This letter responds to your letter of July 21, 1982 in which you request a determination of whether certain models of high-wheel lawn mowers manufactured by Sarlo Power Mowers, Inc. ("Sarlo") are consumer products and thus subject to the Safety Standard for Walk-Behind Power Lawn Mowers, 16 CFR Part 1205. The data you have submitted are insufficient to determine whether these mowers are consumer products.

As you know, the term "consumer product" is defined in 15 U.S.C. § 2052(a)(1), and the term does not include "any article which is not customarily produced or distributed for sale to, or use or consumption by, or enjoyment of, a consumer." The legislative history of this section indicates that products that are not used more than occasionally by consumers are not consumer products. H.R. Rep. No. 1153, 92d Cong., 2d. Sess. 27 (1972).

In general, we have established no specific criteria to determine whether consumers use a product more than occasionally. Instead, we review all available information relevant to a particular determination.

James F. Rill, Esq.
Page 2

Although much of the information you have submitted-concerning these Sarlo mowers would tend to show their suitability for commercial use, the possibility remains that these mowers are sold to, or used by, consumers more than occasionally. For example, **the** [REDACTED] which markets [REDACTED] of the mowers in the sampling of accounts on page four of your letter, states that it sells these mowers "primarily" to businesses and to individuals who use the mowers in their **lawn** and garden businesses. This obviously leaves open the possibility that there could be a significant degree of consumer use of these mowers.

In addition, the approximately [REDACTED] of Sarlo's production that is not included in the sample **mentioned** above consists largely of single-unit transactions. Sales to consumers may be more likely to be **reflected** in such transactions than in the bulk transactions described in the chart on page four.

Furthermore, the chart in your letter indicates that a number of these mowers are sold to rental outlets. The extent to which these rental mowers may be used by consumers **has** not been established.

We note that there is an indication in your letter that there may be a consumer demand for these mowkrs. It is not clear how the price, weight, or other features of the complying mower that is to be produced would motivate these consumers to **purchase** the complying version rather than the commercial version.

Generally, the manufacturer of a product should be in the best position to determine the use and distribution patterns of the product. We recommend that manufacturers consider their products to be consumer products unless the available information clearly establishes that this is not the case.

If Sarlo is able to control or document its channels of **dis-**tribution in such a way as to assure that the mowers in question are not sold to or used by consumers more than occasionally, the mowers would not be consumer products. However, we believe that the information available at this time is insufficient to make such a determination.

Sincerely,



Martin Howard Katz
General Counsel

UNITED STATES GOVERNMENT

Memorandum

U.S. CONSUMER PRODUCT
SAFETY COMMISSION

TO : THE FILE

DATE: August 18, 1982

FROM : Susan Birenbaum, Special Assistant to the General Counsel

SUBJECT: Telephone Conversation Between Judith **Oldham**, Collier,
Shannon and **Rill**, and Susan Birenbaum
Re: Sarlo Mowers

Jim Rill is **out of** town and will be back tomorrow morning.

I spoke to Judith **Oldham** and read her the letter on Sarlo mowers and said it would be sent out tomorrow morning.

Judith **Oldham** said Sarlo would submit further **informa-**
tion and wanted fast determination [REDACTED]
[REDACTED]. I told Ms. **Oldham** we would do all we could to expedite but that the type of information submitted would influence the amount of time it **would** take to analyze.

Ms. **Oldham** stated that Yazoo wanted us to reconsider. I told her to have them write us a letter.

UNITED STATES GOVERNMENT

Memorandum

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

TO : Carl W. Blechschmidt, EX-P
THROUGH: Walter R. Hobby, AED, Economics
FROM : Gregory B. Rodgers, ECCP GR
SUBJECT: Commercial Exemption to the Mower Standard for Sarlo Power Mowers, Inc.

DATE: August 9, 1982

W.R.H.
8-9-82

Sarlo Power Mowers, Inc. has requested that its line of commercial mowers be exempted from the mower standard. There is some confusion in their attorney's letter of July 21, 1982, concerning which models are actually included in the request (compare pages one and three of that letter), but we believe the more inclusive list on page three is accurate. Our comments will therefore pertain to the mowers specified on page three.

Sarlo produces a relatively small volume of commercial mowers. They are intended for heavy duty use and are built with high-wheels for use on rugged terrain. The width of cut of these models range from 20 inches to 26 inches, and the engines range from 4 to 8 horsepower. Their weight varies from 88 to 164 pounds, and their suggested 1981 list price ranges from almost \$400 to over \$900.

It should be noted that the weight and price of some of the smaller models are not inconsistent with the price and weight of mowers in the upper end of the consumer market.

To accommodate occasional consumer purchases of its high-wheeled mowers Sarlo intends to manufacture a 21 inch, 4 horsepower mower that does comply with the mower standard. Sarlo also intends to instruct its dealers and distributors that, with the exception of the complying consumer model, the Sarlo mowers are not intended for consumer use and should be sold to commercial users.

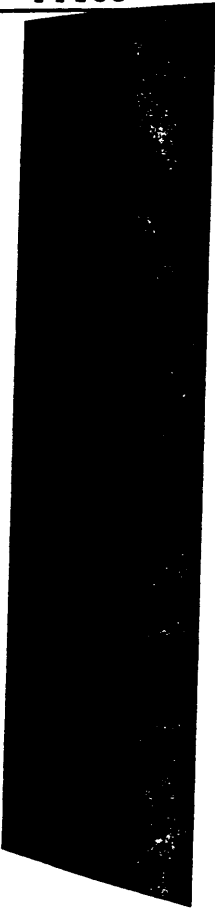
products covered by the Act would impose a substantial compliance burden on Sarlo without reducing any actual risk of injury to consumers.

1. Sarlo's High-Wheel Mowers Possess the Physical Characteristics of Commercial Equipment

Sarlo's line of commercial quality high-wheel mowers includes 4-8 HP hand-push and self-propelled mowers with cutting widths of 21-26". Sarlo's mowers are similar in every respect to other high-wheel mowers which the Commission has recently classified as commercial. The high-wheel mowers are designed with heavy-duty features and durable materials suitable for the long-term, continuous and rough use they receive during commercial applications. For example, the extra-heavy gauge steel stamped deck is welded to a tough angle iron frame for maximum strength and long life. The Sarlo hub and spindle components are designed to withstand severe stress; the separate belt-driven spindle minimizes shock and abuse of the engine components during commercial applications. Similarly, the plowshear-type handle and 16-20" diameter pneumatic rear tires are designed for use on rough terrain and tall grasses.

The high-wheel models for which Sarlo seeks an interpretation have Briggs & Stratton [REDACTED] engines. Most of Sarlo's high-wheel mowers are also available with the Briggs & Stratton [REDACTED] engine.

Because of the commercial quality materials and features used in Sarlo's high-wheel mowers, these mowers also cost more than the typical mower sold for consumer use. As the following price list suggests, the typical consumer is not likely to purchase a commercial quality high-wheel mower for home applications:

	<u>Model</u>	<u>Description</u>	<u>Suggested 1981 List Price</u>
21" cut ✓ 16" Wheels ✓	416	Push, 4 h.p. Briggs	
Semi-Pneu Tires ✓	416SP	Self Propelled 4 h.p. Briggs	
21" cut 20" Wheels ✓ ✓	420SP	Self Propelled 4 h.p. Briggs	
Pneumatic Tires			
	V4B2	Push, 4 h.p. Briggs	
21" cut ✓	V4B3	Push, 4 h.p. Briggs	
20" Wheels ✓	V5B2	Push, 5 h.p. Briggs	
Semi-Pneu Tires ✓ ✓	V5B3	Push, 5 h.p. Briggs	
	V5B3	Push, 5 h.p. Briggs	
24" Cut ✓ ✓	524	Push, 5 h.p. Briggs	
20" Wheels ✓ ✓	524SP	Self Propelled, 5 h.p. Briggs	
Pneumatic Tires ✓ ✓			
26" cut 20" Wheels ✓ ✓	800A	Self Propelled, 8 h.p. Briggs Synchro Balanced	
Pneumatic Tires			

Based on the physical characteristics and increased cost of the high-wheel mowers, they should not be regarded as consumer products within the coverage of the Consumer Product Safety Act.

2. Sarlo's High-Wheel Mowers Are Marketed Primarily to Commercial and Agricultural Users

Sarlo's high-wheel mowers are not marketed as an article of commerce for sale to the typical consumer. As indicated in numerous letters submitted by Sarlo's distributors and dealers,^{1/} Sarlo's marketing and promotional activity is directed exclusively toward commercial and agricultural users. Sarlo advertises its high-wheel mowers only in publications intended to reach commercial and agricultural users. Moreover, while Sarlo does not have reliable information on the ultimate disposition of all of its

1/ These letters are attached as Appendix B.

Sarlo advertises its mowers exclusively in publications intended for **commercial** and agricultural users. It does not have **full** information on the ultimate purchasers of **all** of its mowers, but did piece together information on about two thirds of its 19804981 sales. That information suggests that the high proportion of its mowers are in fact purchased by commercial users. Mr. Sarlo **also** believes that the remaining one third of 19804981 sales would be very similar to the sales **that** were accounted for. **Several** letters from **Sarlo's dealers** and distributors were enclosed with the exemption request to attest to the **commercial** nature of the Sarlo mowers.

Because of the physical and price characteristics mentioned, the arguments for the exemption of several **of** the mower models are somewhat weaker than in previous exemption requests. **However**, the manufacturer has provided information which **indicates** that the Sarlo mowers are intended for commercial use and that the great majority are sold to commercial **users**. It is therefore our opinion that the specified Sarlo mowers are not normally used by consumers and should be exempted from the mower standard.

UNITED STATES GOVERNMENT

U.S. CONSUMER PRODUCT
SAFETY COMMISSION

Memorandum

13 AU6 1982

TO : Carl Blechschmidt, OPM
Through: Martin Howard Katz, General Counsel
Stephen Lemberg, Assistant General Counsel

DATE: *[Handwritten signature]*

FROM : Harleigh Ewell, OGC *HE*

SUBJECT: Request of Sarlo Power Mowers, Inc., for a Jurisdictional
Determination for Their High-Wheel Mowers

Attached is a copy of a request on behalf of Sarlo Power Mowers, Inc. for a determination that their high-wheel mowers are not consumer products and therefore not subject to the power mower standard. Please obtain any comments that the staff might have concerning the use and distribution patterns for these mowers.

Collier, Shannon, Rill & Scott
Attorneys - at-Law
1055 Thomas Jefferson Street, N.W.
Washington, D. C. 20007

Telephone: (202) 342-8400
Writer's Direct Dial Number
(202) 342-8445



July 21, 1982

Martin Katz, Esq.
General Counsel
Consumer Product Safety Commission
5401 Westbard Avenue
Bethesda, Maryland 20207

Dear Mr. Katz:

This letter is a request on behalf of Sarlo Power Mowers, Inc. ("Sarlo") for an interpretation, pursuant to 16 C. F. R. § 10007, of the Consumer Product Safety Act as it applies to the Commission's Safety Standard for Walk-Behind Power Lawn Mowers, 16 C.F.R. Part 1205 ("Standard"). Specifically, Sarlo requests a determination that certain of its high-wheel lawn mowers are "commercial" rather than "consumer" products and are not, therefore, covered by the Consumer Product Safety Act, 15 U.S.C. § 2501, et seq.

Sarlo manufactures a line of high-wheel walk-behind lawn-mowers designed to meet the needs of commercial users in rural and agricultural areas of the United States. Located in Fort Meyers, Florida, Sarlo is the oldest family-owned rotary mower manufacturer in the United States, and the first to sell the high-wheel mower. Today Sarlo produces approximately [redacted] high-wheel mowers annually. The mowers for which Sarlo requests an interpretation are identified as 416 and 416-SP (21"-cut, 4 HP), 420-SP (21"-cut, 4 HP), V5B2 (21"-cut, 5 HP), 524 and 524-SP (24"-cut, 5 HP), and 800A (26"-cut, 8 HP). Descriptions of these commercial mowers and their specifications are contained in Appendix A, attached. In order to accommodate the occasional consumer who may wish to purchase a high-wheel mower for home use, Sarlo will also manufacture a 21"-cut, 4 HP mower with a deadman control that complies with the new CPSC standard.

Although Sarlo's high-wheel mowers do not satisfy any of the express exclusionary criteria set forth at 16 C. F. R. § 1205.1(c), their physical characteristics, marketing system, and actual sales patterns indicate that they are not consumer products within the terms or objectives of the Consumer Product Safety Act or the Standard. To construe them to be consumer

mowers, Sarlo's President, Mr. Arnold L. Sarlo, has been able, through the use of invoices and [redacted] returned warranty cards, to compile the following information regarding purchasers of high-wheel mowers during the 1980-81 season.



The information reflected in this chart accounts for approximately [redacted] of Sarlo's high-wheel mower sales in 1980-81. Mr. Sarlo believes, based on his lifelong experience with the firm, that the distribution and use patterns for the remaining [redacted] of the mowers sold last year would be very similar to those represented on the chart. Mr. Sarlo has indicated that the mowers not reflected on the chart are sold one-at-a-time on a "made to order" basis, i.e., the dealer will have ordered the mower for a known commercial user. Since the [redacted] mowers not accounted for on the chart are single unit transactions [redacted] to hundreds of different users, they are more difficult to trace than the 'bulk transactions reflected on the chart. Mr. Sarlo has stated, however, that if a more detailed accounting of the remaining mower sales is necessary to obtain a "commercial" designation for Sarlo's high-wheel products, he will attempt to compile more complete data.

* These equipment sales and rental outlets purchase high-wheel units which they designate as "California Weed Cutters"; they are used primarily in commercial applications characterized by large expanses of tall, dense weeds.

** [redacted] Vice-president of the [redacted] [redacted] has confirmed that his [redacted] company stores sell Sarlo's high-wheel mowers primarily to businesses and individuals who use the mowers in their lawn and garden businesses.

Page Six

production units." Id. [REDACTED]
[REDACTED]

Because the Commission's decision on this matter will have a major impact on Sarlo's future operations, we request a status determination at the earliest time possible. [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] We trust that the Commission will be able to expedite this matter, particularly in light of the similarities between Sarlo's high-wheel products and those recently categorized as non-consumer products by the Commission.

Sincerely,

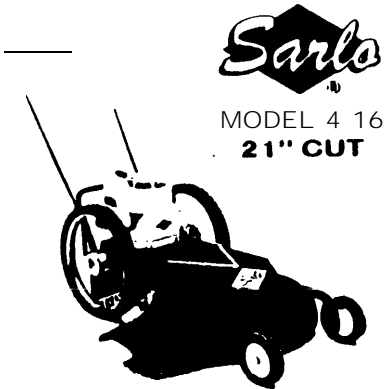


JUDITH L. OLDHAM

JLO:jab

MODEL 4 16
SPECIFICATIONS

WEIGHT	210 pounds
CUTTING SWATH	21"
WHEELS, REAR	16" diam
SPOKES	20 — 135 Ga
TIRES, REAR	16 x 1 75 semi pneumatic
FRONT WHEELS	6" x 1 50"
DRIVE BELT	Heavy Duty Special
BLADE	21" x 3/16" x 2% Shatterproof Airlift
ENGINE	4 hp Briggs & Stratton



Sarlo
MODEL 4 16
21" CUT

MODEL 4 16SP
SPECIFICATIONS

WEIGHT	210 pounds
CUTTING SWATH	21"
WHEELS, REAR	16" diam
SPOKES	20 — 135 Ga
TIRES, REAR	16 x 1 75 semi pneumatic
FRONT WHEELS	6" x 1 50"
DRIVE BELT	Heavy Duty Special
BLADE	21" x 3/16" x 2% Shatterproof Airlift
ENGINE	4 hp Briggs & Stratton
SELF PROPELLING UNIT	Sarlo Model 3102



Sarlo
MODEL 4 16SP
Self-Propelled
21" CUT

MODEL 420SP
SPECIFICATIONS

WEIGHT	210 pounds
CUTTING SWATH	21"
WHEELS, REAR	20" diam
SPOKES	36 — 105 Ga
TIRES, REAR	20 x 2 125 pneumatic
FRONT WHEELS	6" x 1 50"
DRIVE BELT	Heavy Duty Special
BLADE	21" x 3/16" x 2% Shatterproof Airlift
ENGINE	4 hp Briggs & Stratton
SELF-PROPELLING UNIT	Sarlo Model 3102



Sarlo
MODEL 420SP
Self-Propelled
21" CUT

MODEL 624
SPECIFICATIONS

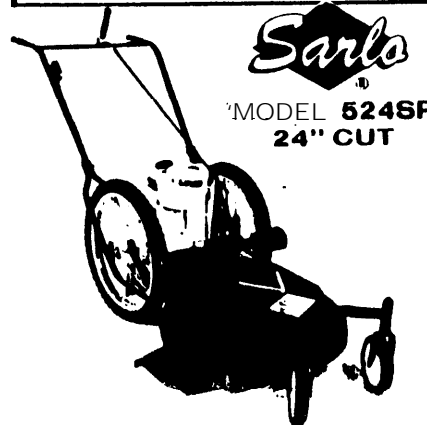
WEIGHT	240 pounds
CUTTING SWATH	24"
WHEELS, REAR	20" diam
SPOKES	36 — 105 Ga
TIRES, REAR	20 x 2 125 pneumatic
FRONT WHEELS	Swivel 7" x 1 50"
DRIVE BELT	Heavy Duty Special
BLADE	24 x 3/16" x 2% Shatterproof Airlift
ENGINE	5 hp Briggs & Stratton



Sarlo
MODEL 624
24" CUT

MODEL 524SP
SPECIFICATIONS

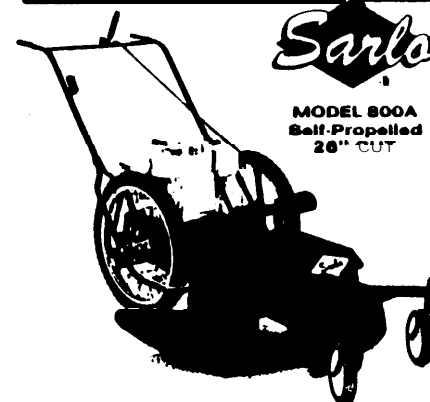
WEIGHT	240 pounds
CUTTING SWATH	24"
WHEELS, REAR	20" diam
SPOKES	36 — 105 Ga
TIRES, REAR	20 x 2 125 pneumatic
FRONT WHEELS	Swivel 7" x 1 50"
DRIVE BELT	Heavy Duty Special
BLADE	24" x 3/16" x 2% Shatterproof Airlift
ENGINE	5 hp Briggs & Stratton
SELF PROPELLING UNIT	Sarlo Model 3000



Sarlo
MODEL 524SP
24" CUT

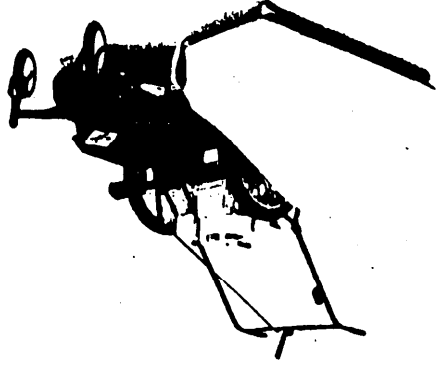
MODEL 800A
SPECIFICATIONS

WEIGHT	260 pounds
CUTTING SWATH	26"
WHEELS, REAR	20" Heavy Duty
SPOKES (36)	120 Ga
TIRES, PNEUMATIC, REAR	20 x 2 125
(Heavy Duty Studded, with Heavy Duty Tubes)	
FRONT WHEELS (2)	Swivel 7" x 1 50"
DRIVE BELT, Special Oil-Proof	Heavy Duty
BLADE, Shatterproof airlift	26"
SELF-PROPELLING UNIT	Sarlo Model 3003
ENGINE, Synchro Balance Vertical	8 hp Briggs & Stratton

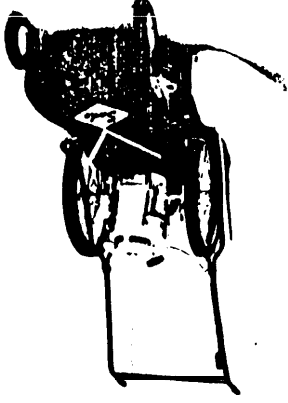


Sarlo
MODEL 800A
Self-Propelled
26" CUT

11



SARLO 5M CATCHER
 SHOWN BELOW ON MODEL 800A
 SAFETY APPROVED
 EFFICIENT, FITS 26" MOWERS
 EASY TO USE
 3 BUSHEL CAPACITY, APPROX
 SELF SUPPORTING, NO ADDITIONAL
 WEIGHT ON THE MOWER



SARLO 12G CATCHER
 SHOWN BELOW ON MODEL V8B2
 SAFETY APPROVED
 EFFICIENT, FITS 21" & 24"
 EASY TO USE
 1 1/2 BUSHEL CAPACITY, APPROX
 MISSILE PROOF BAG
 NON DRAGGING



MODELS V4B3 & V8B3
SPECIFICATIONS
 CUTTING SWATH 21" dia
 WHEELS, REAR 36 — 105 Ga
 SPOKES
 TIRES, REAR 20 x 1.75 semi pneumatic
 DRIVE BELT Heavy Duty Special
 FRONT WHEELS, Single Swivel 7" x 1.50"
 BLADE 21" x 3/16" x 2 1/2" Shatterproof Arli
 ENGINE V8B3 Vert Shaft, 4 hp Briggs & Stratton
 ENGINE V8B3 Vert Shaft, 5 hp Briggs & Stratton

The mower designed with the commercial user in mind

SARLO HIGH WHEELS ROLL EASIER.
 High wheels hardly notice the holes that low wheels can drop into and make pushing tough.
 Big diameter wheels lower the resistance of grass that small wheels push against.

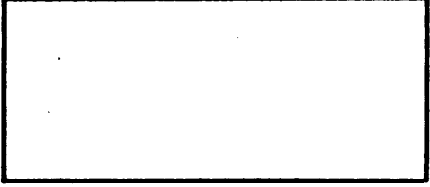
SARLO HIGH WHEELS allow BIGGER ENGINES while retaining excellent balance and easy handling. Bigger engines ♦♦♦♦ low loeqm • tougher to maneuver.

WHY HIGH WHEELS?
 To move forward, resistance must be overcome. Cavemen did it with skids and log rollers. Then someone discovered that sections of logs with a smaller log for an axle worked even better. Thus was born today's wheel.

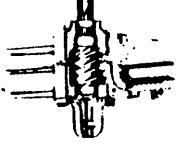


SARLO POWER MOWERS, Inc.
 P. O. Box 1169 Fort Myers, Florida 33902
 (813) 332-1955 (Manufacturers Since 1935)

Prices and Specifications Subject to Change Without Notice



WELDED STEEL FRAME
 Extra heavy gauge steel stamped deck is welded to tough angle iron frame for maximum strength and long life.
HUB & SPINDLE
 Because of the severe stress, strain and wear encountered by this important unit, dependability and durability are built in to the matchless quality of the Sarlo hub and spindle. Separate belt-driven spindle saves shock and abuse of engine components.



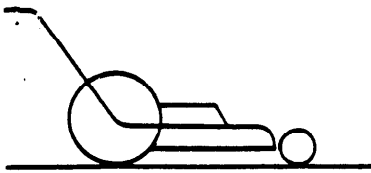
SAFETY GUARDS
 In keeping with OPEL national safety standards, Sarlo Power Mowers are equipped with a rear deflector shield plus the safety discharge chute extension.
SELF-PROPELLING UNIT
 Models 5245F, 800A
 Heart of this self-propelling drive train with semi-differential action (65 individual parts) in a gear box second to none in the industry. Castings, heat-treated gears and hardened spline crawlers assure positive traction with minimum wear. Clutch lever is handy and simple to operate.

Quality Features



MODELS V4B2 & V8B2
SPECIFICATIONS
 CUTTING SWATH 21" dia
 WHEELS, REAR 36 — 105 Ga
 SPOKES
 TIRES, REAR 20 x 1.75 semi pneumatic
 DRIVE BELT Heavy Duty Special
 FRONT WHEELS 6" x 1.50"
 BLADE 21" x 3/16" x 2 1/2" Shatterproof Arli
 ENGINE V8B2 Vert Shaft, 5 hp Briggs & Stratton
 ENGINE V4B2 Vert Shaft, 4 hp Briggs & Stratton

Withhold- a2, b3 + b4

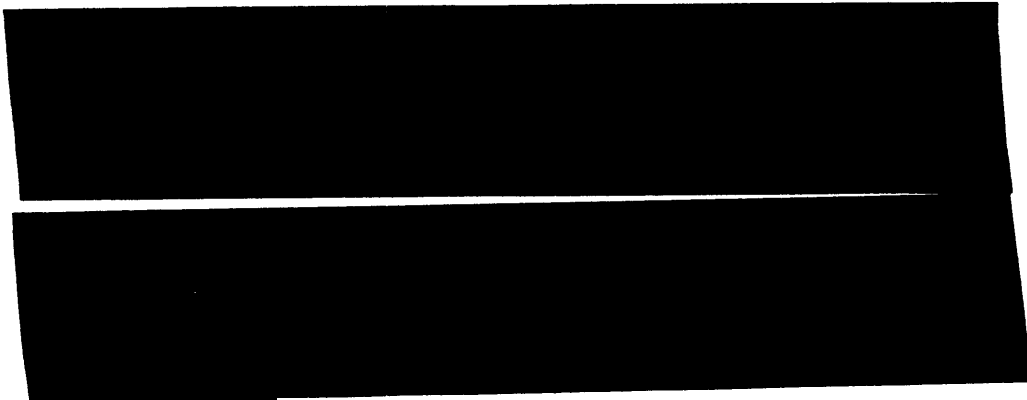


SARLO POWER MOWERS, Inc.

P.O. BOX 1169 . 2315 ANDERSON AVENUE . TELEPHONE (813) 332-1955
FORT MYERS, FLORIDA 33902

June 30, 1982

Sarlo Power **Mowers** have been manufactured from the same basic design for **47 years.** In that time there **have** only been two accident cases filed against us. **Both of which are still pending.**



I **certify** that Sarlo **Power Mowers** Inc. in 47 years has had only two accident cases filed against **them** and that the **above** is a true and correct statement.

Arnold L. Sarlo
President
Sarlo **Power Mowers**, Inc.