

UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

BALLOT VOTE SHEET

DATE: SEP 10 2007

TO: The Commission
Todd A. Stevenson, Secretary

THRU: Patricia M. Semple, Executive Director

FROM: Lowell F. Martin, Acting General Counsel
Jeffrey R. Williams, Assistant General Counsel
Barbara E. Parisi, Attorney _{BEP}

SUBJECT: Technical Amendment to the Flammability Standards for Carpets and Rugs; Final Rule

SEP 18 2007

BALLOT VOTE DUE: _____

Attached is a briefing package from the staff recommending that the Commission direct the Office of General Counsel ("OGC") to prepare a *Federal Register* notice containing a final rule concerning the flammability standards for carpets and rugs, 16 C.F.R. Parts 1630 and 1631. The rule would remove the reference to Eli Lilly Company Product No. 1588 and replace that reference with the technical parameters defining the timed burning tablet as the standard ignition source.

Please indicate your vote:

- I. Direct OGC to prepare a *Federal Register* notice containing a final rule revising the carpet and rug flammability standards for consideration by the Commission.

Signature

Date

- II. Do not direct OGC to prepare a *Federal Register* notice containing a final rule revising the carpet and rug flammability standards for consideration by the Commission.

CPSC Hotline: 1-800-638-CPSC(2772) | CPSC's Web Site: <http://www.cpsc.gov>

NOTE: This document has not been reviewed or accepted by the Commission.
Initial LM Date 9/10/07

III. Take other action. (Please specify.)

Signature

Date



**FINAL RULE
FOR A TECHNICAL AMENDMENT
TO THE
FLAMMABILITY STANDARDS
FOR CARPETS AND RUGS
16 C.F.R. PART 1630 AND 16 C.F.R. PART 1631
BRIEFING PACKAGE**

For further information contact:

Patricia K. Adair, Project Manager
Directorate for Engineering Sciences
Consumer Product Safety Commission
(301) 504-7536

**NOTE: This document has not been
reviewed or accepted by the Commission.**
Initial PA Date 9/10/07

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EXECUTIVE SUMMARY

The U.S. Consumer Product Safety Commission (CPSC) administers two flammability standards for carpets and rugs: 16 Code of Federal Regulations (C.F.R.) Part 1630 – *Standard for the Surface Flammability of Carpets and Rugs* and 16 C.F.R. Part 1631 – *Standard for the Surface Flammability of Small Carpets and Rugs*. The standards establish minimum acceptance criteria for the surface flammability of carpets and rugs when exposed to a standard small source of ignition under prescribed conditions (the “pill test”). The pill test was designed to determine the surface flammability of carpets and rugs when exposed to a small ignition source and to keep dangerously flammable products from distribution in commerce.

Both standards require a timed burning tablet as the standard ignition source for flammability performance testing. The standards define the ignition source as a methenamine tablet, weighing approximately 0.149 gram (2.30 grains), sold as Product No. 1588 in Catalog No. 79, December 1, 1969, by the Eli Lilly Company, or an equal tablet.

On November 13, 2006, the Commission issued a *Federal Register* notice to amend the flammability standards for carpets and rugs to remove the reference to the Eli Lilly Company’s Product No. 1588 in Catalog No. 79, December 1, 1969, as the standard ignition source and provide a generic specification defining the ignition source at §1630.1(f) and §1631.1(f) and solicited public comments. The proposed specification for the standard ignition source is a timed burning tablet, flat, consisting of pure methenamine, with a nominal heat of combustion value of 7180 calories/gram, a mass of 150 mg \pm 5 mg, and a nominal diameter of 6 mm. The Commission received one comment in support of the proposal, and one objecting to flammability testing as a mandatory requirement and recommending that compliance with the standards be voluntary to avoid potential trade restrictions on woolen rugs. On January 12, 2007, the Commission issued a *Federal Register* notice providing interested persons the opportunity for oral or written presentations regarding the proposed technical amendment to the flammability standards for carpets and rugs. No responses to the *Federal Register* notice were received by the requested date of February 12, 2007.

The staff recommends that the Commission issue the proposed rule as a final rule. The staff further recommends an immediate effective date upon publication of the amendment since the equivalent tablets are already commercially available and no comments were received in opposition to an immediate effective date.



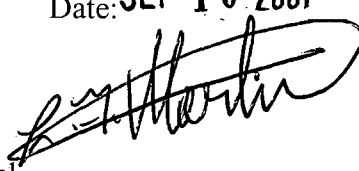

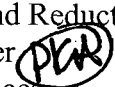
UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

Memorandum

Date: SEP 10 2007

TO : The Commission
Todd Stevenson, Secretary

THROUGH: Lowell F. Martin, Acting General Counsel
Patricia M. Semple, Executive Director

FROM : Robert J. Howell, Acting Assistant Executive Director 
Office of Hazard Identification and Reduction
Patricia K. Adair, Project Manager 
Directorate for Engineering Sciences 

SUBJECT : Final Rule for Amendment to the Flammability Standards for Carpets and Rugs, 16 C.F.R. Part 1630 and 16 C.F.R. Part 1631

I. INTRODUCTION

This memorandum provides a review of the public comments received in response to the Commission's November 13, 2006, proposed technical amendment to the flammability standards for carpets and rugs, 16 C.F.R. Part 1630 and 16 C.F.R. Part 1631 (TAB A). The staff recommends publishing the proposed technical amendment as a final rule.

II. BACKGROUND

The standards for surface flammability of carpets and rugs appear at 16 C.F.R. Parts 1630 and 1631. They were codified and published in 1975, 40 *Fed. Reg.* 59931 and 59935 (December 30, 1975). The standards were originally issued in 1970 by the Department of Commerce under the authority of the Flammable Fabrics Act (FFA). Subpart A of 16 C.F.R. Parts 1630 and 1631 sets forth the standards. Subpart B contains the implementing regulations of the standards. Subpart C contains alternative washing procedures for hides and wool flokati carpets and rugs. Subpart D of 16 C.F.R. 1630 contains the staff interpretations and policies.

16 C.F.R. Parts 1630 and 1631 establish minimum acceptance criteria for the surface flammability of carpets and rugs when exposed to a standard small source of ignition, a burning methenamine tablet, under prescribed conditions (the "pill test"). These standards reduce the risks of death, personal injury, and property damage associated with fires that result from the surface ignition of carpets and rugs.

Both standards require a timed burning tablet as the standard ignition source for flammability performance testing. The standards define the ignition source at §1630.1(f) and §1631.1(f) as a methenamine tablet, weighing approximately 0.149 gram (2.30 grains), sold as Product No. 1588 in Catalog No. 79, December 1, 1969, by the Eli Lilly Company ('Lilly'), or an equal tablet.

In April 2002, Commission staff learned Lilly was no longer producing the methenamine tablets specified in the carpet and rug standards. Although the standards allow for the use of "an equal" tablet and give parameters for chemical composition and weight of the tablet, no guidance is provided on determining whether tablets from alternative sources are "equal" to those manufactured by Lilly. In July 2003, CPSC staff met with representatives of the Carpet and Rug Institute (CRI) to discuss evaluation of alternative methenamine tablets for use in 16 C.F.R. Part 1630 and Part 1631. CRI members were experiencing differing test results using the Lilly tablets and currently available tablets. CRI members had begun to study the various characteristics of the current tablets.

CRI urged the Commission to specify the characteristics of the "equal" tablets that should be used for determining compliance to the carpet and rug standards. In an effort to make such a determination, the Commission staff conducted a comparison study to evaluate the weight, chemical composition, and combustion characteristics of presently available brands of methenamine tablets relative to each other and those previously produced by Lilly. The study indicated that tablets consisting of essentially pure methenamine, having a heat of combustion value of approximately 7180 calories/gram, and weighing approximately 0.149 gram may be considered equivalent to the tablets produced by Lilly and referenced in the regulation.¹

On July 29, 2004, the CPSC's Office of Compliance issued a letter to industry in response to inquiries received by the CPSC staff regarding the equivalency of methenamine tablets formerly manufactured by Lilly and similar tablets currently produced by other manufacturers. The letter stated that the Commission staff determined that tablets consisting of pure methenamine and weighing approximately 0.149 grams may be considered equivalent to the tablets formerly produced by Lilly. Therefore, tablets meeting these criteria may be used for purposes of determining compliance with the carpet and rug standards.

On November 13, 2006, the Commission issued a *Federal Register* notice proposing to amend the methenamine tablet specifications in the flammability standards for carpets and rugs and soliciting public comments.² Two comments were received. On January 12, 2007, the Commission issued a *Federal Register* notice providing interested persons the

¹ See the October 3, 2006 Briefing Package, *Technical Amendment to the Flammability Standards for Carpets and Rugs*, 16 C.F.R. Part 1630 and 16 C.F.R. Part 1631, U.S. Consumer Product Safety Commission.

² 71 *Federal Register* 66145; "Technical Amendment to the Flammability Standards for Carpets and Rugs, Proposed Amendments", November 13, 2006.

opportunity for oral or written presentations regarding the proposed technical amendment.³ No responses were received by the requested date of February 12, 2007.

III. RESPONSE TO COMMENTS ON PROPOSED TECHNICAL AMENDMENT

Comment: The American Fiber Manufacturers Association supported the technical amendment allowing the use of methenamine tablets from any source that produces the specified characteristics, as proposed.

Comment: A comment was received from the Permanent Mission of India to the World Trade Organization. The commenter objected to flammability testing as a mandatory requirement and recommended that compliance with the standards be voluntary to avoid potential trade restrictions on woolen rugs. The staff notes that the standards have been in effect since 1970; the proposed technical amendment only provides a generic specification for the ignition source and would not alter the overall scope of the standards. Thus, the amendment would have no impact on U.S. or international trade.

IV. FINAL REGULATORY ANALYSIS

The final regulatory analysis prepared by the Directorate for Economic Analysis (EC, see TAB B) concludes that, if the Commission promulgated the proposed technical amendment to the flammability standards for carpets and rugs:

- The current industry practice of using equivalent methenamine tablets would continue without interruption;
- The effectiveness of the standards would be unaffected, and testing costs to manufacturers and importers would not increase, so the net impact on benefits and costs would be essentially zero;
- No reasonable regulatory alternatives exist that would further reduce testing costs;
- There would be no significant impacts on small firms or other small entities; and
- There would likely be no significant environmental impacts.

V. CONCLUSIONS

The staff concludes that it is appropriate to amend the standards to: (1) remove the reference to the Eli Lilly Company's Product No. 1588 as the standard ignition source (*16 C.F.R. §1630.1(f) and §1630.4(a)(3) and 16 C.F.R. §1631.1(f) and §1631.4(a)(3)*) since this product is no longer produced or sold by the Eli Lilly Company; and (2) describe the ignition source more precisely in *16 C.F.R. §1630.1(f) and §1630.4(a)(3) and 16 C.F.R. §1631.1(f) and §1631.4(a)(3)* as a methenamine tablet, flat, with a nominal heat of combustion value of 7180 calories/gram, a mass of 150 ± 5 mg and a nominal diameter of 6 mm. The staff continues to believe that an immediate effective date would not be

³ 72 *Federal Register* 1472; "Proposed Technical Amendment to the Flammability Standards for Carpets and Rugs; Notice of Opportunity for Oral Comment", January 12, 2007.

disruptive. Testing laboratories are already using “equal” methenamine tablets as allowed by the current standards, and no comments were received in opposition to an immediate effective date.

VI. OPTIONS

1. Direct the staff to prepare a draft *Federal Register* notice of a final rule to amend 16 C.F.R. Part 1630 *Standard for the Surface Flammability of Carpets and Rugs* and 16 C.F.R. Part 1631 *Standard for the Surface Flammability of Small Carpets and Rugs* in accordance with the staff recommendation.
2. Make no change to amend 16 C.F.R. Part 1630 *Standard for the Surface Flammability of Carpets and Rugs* and 16 C.F.R. Part 1631 *Standard for the Surface Flammability of Small Carpets and Rugs*.

VII. STAFF RECOMMENDATION

The staff recommends that the Commission direct the staff to prepare a draft *Federal Register* notice of a final rule to remove the reference to the Eli Lilly Company’s Product No. 1588 and reflect the parameters defining the timed burning tablet as the standard ignition source with an immediate effective date upon publication of the amendment.

VIII. REFERENCES

1. “Briefing Package: Technical Amendment to the Flammability Standards for Carpets and Rugs, 16 C.F.R. Part 1630 and 16 C.F.R. Part 1631,” U.S. Consumer Product Safety Commission, October 3, 2006.
2. *Federal Register* notice “Technical Amendment to the Flammability Standards for Carpets and Rugs; Proposed Amendments” published by the U.S. Consumer Product Safety Commission, November 13, 2006.
3. *Federal Register* notice “Proposed Technical Amendment to the Flammability Standards for Carpets and Rugs; Notice of Opportunity for Oral Comment” published by the U.S. Consumer Product Safety Commission, January 12, 2007.

TAB A



UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

Memorandum

Date: March 30, 2007

TO : Patricia K. Adair, ESFS
Project Manager, Carpet and Rug Flammability

THROUGH: Gregory B. Rodgers, Ph.D. Associate Executive Director, Economic Analysis *GBR*
Deborah V. Aiken, Ph.D., Senior Staff Coordinator *DVA*

FROM : Dale R. Ray, Directorate for Economic Analysis *DRR*

SUBJECT : Final Regulatory Analyses --- Standards for Carpets and Rugs

Attached is a consolidated Directorate for Economic Analysis (EC) report presenting a final regulatory analysis, final regulatory flexibility analysis and environmental review of a technical amendment to the Commission's Standard for Carpets and Rugs, 16 CFR 1630 and 1631. The Commission proposed this amendment in November 2006. The EC report provides information related to required findings under each of the three applicable statutes: the Flammable Fabrics Act, the Regulatory Flexibility Act and the National Environmental Policy Act.

Attachment



**Final Regulatory Analysis:
Technical Amendment to the
Carpet & Rug Flammability Standards
(16 CFR Parts 1630 & 1631)**

Dale R. Ray
Terrance R. Karels
Directorate for Economic Analysis
U.S. Consumer Product Safety Commission

March 2007

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Executive Summary

On November 13, 2006, the U.S. Consumer Product Safety Commission (CPSC) proposed a technical amendment to the flammability standards for carpets and rugs, 16 CFR Parts 1630 and 1631. These standards were originally issued under the Flammable Fabrics Act (FFA) by the Department of Commerce in 1970, and codified by CPSC in 1975. The proposed amendment would revise the specification for the timed burning methenamine tablet used as the ignition source in the flammability performance tests of the standards.

Since 2002, when production of the previous methenamine tablet was discontinued by its manufacturer, producers and importers of carpets and rugs that comply with the standards have been performing tests with "equivalent" methenamine tablets. The technical amendment would, therefore, maintain current industry practice. The amendment, if issued on a final basis, would not significantly affect the benefits and costs associated with the standards; expected benefits and costs of the amendment itself would be essentially zero. The Commission received one public comment in general support of the proposal, and one in general opposition; no changes to the regulatory analysis were made as a result of these comments.

There would be no significant impact on small firms subject to the standards or other small entities, and there would be no significant environmental impacts. Further, no reasonable regulatory alternatives have been identified that would make the standard more effective or less costly.

Introduction

On November 13, 2006, the U.S. Consumer Product Safety Commission (CPSC) proposed a technical amendment to the flammability standards for carpets and rugs, 16 CFR Parts 1630 and 1631. These standards were originally issued under the Flammable Fabrics Act (FFA) by the Department of Commerce in 1970, and codified by CPSC in 1975. The proposed amendment would revise the specification for the methenamine tablet used as the ignition source in the flammability performance tests of the standards.

The existing standards specify the timed burning tablet as a "methenamine tablet, weighing approximately 0.149 gram (2.30 grains) sold.... by the Eli Lilly Company.... or an equal tablet." Since 1970, carpet and rug manufacturers have used methenamine tablets produced by that single manufacturer (Lilly) to ensure compliance. Lilly ceased production of the test tablets in 2002, however, and other manufacturers are now producing methenamine tablets. The proposed technical amendment specifies a flat, timed burning tablet of pure methenamine, having a heat of combustion value of 7,180 calories per gram, a mass of 150 ± 5 milligrams, and a nominal diameter of 6 millimeters; any such item may be considered equivalent to the original Lilly tablet.

Requirements of Applicable Statutes

The FFA requires that the Commission prepare a final regulatory analysis of any final regulation. The analysis must contain:

- a description of the potential benefits and potential costs of the regulation, including costs and benefits that cannot be quantified in monetary terms, and the identification of those likely to receive the benefits and bear the costs;

- a description of any alternatives to the final regulation which were considered by the Commission, together with a summary description of their potential benefits and costs and brief explanation of the reasons why these alternatives were not chosen; and
- a summary of any significant issues raised by the comments submitted during the public comment period in response to the preliminary regulatory analysis, and a summary of the assessment by the Commission of such issues.

In this case, the Commission must find that:

- The benefits expected from the amendment bear a reasonable relation to its costs; and
- The amendment imposes the least burdensome requirement which prevents or adequately reduces the risk of injury.

Additionally, under the Regulatory Flexibility Act of 1980 (RFA), the Commission is required to address potential effects of the amendment on small businesses and other small entities. Further, under the National Environmental Policy Act (NEPA), the Commission is required to consider the potential environmental impacts of the amendment. This report presents an analysis of potential impacts in accordance with all three of the applicable statutes: the FFA, RFA and NEPA.

Potential Benefits and Costs

The “equivalent” methenamine tablets described under the proposed amendment would share approximately the same burn characteristics as those originally specified by the carpet and rug standards. The use of the replacement tablets would not alter the stringency of the flammability performance tests in the standards; the projected effectiveness of the standards would neither increase

nor decrease as a result. Thus, there would be no impact on the level or value of fire safety benefits (i.e., the reduced risk to the public of fire-related death, injury, or property damage) derived from the carpet and rug standards.

The amendment to the standards is not expected to increase costs to manufacturers and importers of carpets and rugs that currently comply. These firms have been using equivalent tablets since 2002; the cost of the equivalent tablets is reportedly no greater than the cost of the original Lilly tablet. Furthermore, the cost of the test tablets is considered to be minimal compared to other testing costs. It is possible that, with competition, prices of methenamine tablets could decrease, thereby reducing testing costs slightly. Overall, the amendment, if issued on a final basis, would not likely have any significant impact on carpet and rug testing costs.

On balance, the technical amendment to redefine the methenamine tablet would have no significant impact on expected benefits or costs of the flammability standards for carpets and rugs. The amendment would simply codify existing practice among manufacturers and importers subject to the standards; both the expected benefits and likely costs of the amendment are essentially zero.

Alternatives

There is an existing U.S. voluntary standard regarding the type of ignition source to be used in testing the flammability of carpets and rugs. This standard, ASTM D2859-04, "Standard Test Method for Ignition Characteristics of Finished Textile Floor Covering Materials," describes the use of the Lilly tablet as satisfactory. It also states that "normal variation in the weight of the different tablets will not affect the test results."

There is an existing international voluntary standard developed by the International Organization for Standardization in 1982 (ISO 6925), that describes a tablet test for the flammability of textile floor coverings. The prescribed tablets are of "hexamethylenetetramine, flat, having a mass of 150mg (plus or minus 5mg) and a diameter of 6mm." The allowable variance is about 3.3%. The mass expressed in ISO 6925 is essentially equivalent to that specified in the U.S. standards under the FFA. While the ISO standard did not identify the Lilly tablet, it noted that the tablets were commercially available. Thus, the ISO-specified tablet is equivalent to the Lilly tablet in its specifications.

Canada's 1973 mandatory standard for carpets and textile floor coverings under the Hazardous Products Act, CGSB 4-GP-2, also specifies in its appendix the Lilly tablet as the ignition source. It notes that "normal variation in weight.... will not affect the test results."

The Commission could choose to use the definition of the test tablet as specified in ISO Standard 6925, which specifies that the burn test tablet have an approximate "mass of 150 mg," which may result in equivalent burn characteristics of alternative methenamine tablets that will continue to be available. This could be accomplished through technical amendments to the carpet and rug standards.

Also, the Commission could choose to direct the staff to develop alternative test methods or other substitute substances that would result in heat-of-combustion values equivalent to that of the Lilly methenamine tablets. However, the staff is not aware of any such substitute product other than methenamine tablets. Any substitute testing process may result in short term disruptions in product development and testing, and in a potential for confusion by manufacturers as to the change in the testing process.

In summary, there are no readily available and technically feasible alternatives that would be significantly different from the Commission's proposed amendment. Thus, no reasonable alternative would be more effective or less costly.

Public Comments

The Commission's November 13, 2006 *Federal Register* notice solicited public comment on the agency's proposed amendment. CPSC received one submission during the comment period, from the American Fiber Manufacturers Association (AFMA), a trade association representing domestic producers and suppliers of manufactured fiber used in carpets and rugs. AFMA stated that the proposed standard "is expected to reduce testing costs and should improve the reliability of test material supply". It also noted that the proposed change "will not result in any diminution of protection for consumers". This comment generally supported the conclusions stated in the preliminary regulatory analysis of the amendment. No changes to the amendment or the regulatory analysis were made in response to the AFMA comment.

An additional comment, from the Permanent Mission of India to the World Trade Organization, generally opposed the mandatory nature of the standards. The comment recommended that testing and compliance be made voluntary in order to avoid potential trade restrictions on woolen rugs. While the Commission could, at some point, consider revoking parts or all of the standards in favor of voluntary measures, there is currently no voluntary standard in place. The comment may reflect a basic misunderstanding of the purpose of the proposed amendment, which would only modify the test material specifications and would not alter the overall scope of the standards. The amendment would have no impact on U.S. or international trade.

Final Regulatory Flexibility Analysis

The RFA requires that the Commission consider whether a rule would have a significant effect on a substantial number of small entities, including small businesses and small government entities. The proposed amendment keeps current industry practices and procedures in place. No additional actions would be required of small entities.

Based on available information, there would be little or no effect of the technical amendment on small producers of carpets and rugs, since the standards already require that all carpets and rugs meet the criteria of the tests and, given the equivalence of the test tablets, the results of the tests should be the same. Consequently, the Commission could conclude that issuing the amendment on a final basis would have no expected economic consequences on a substantial number of small entities.

Environmental Review

Under NEPA, the Commission must consider potential environmental impacts associated with the proposed technical amendment. The proposal continues current industry practices, with equivalent ignition tablets, and without any additional requirements. The Commission received no public comments on environmental issues.

The technical amendment is not expected to have an impact on the production processes developed by manufacturers. Also, there is no expected impact on the amounts of materials used in manufacture, packaging or labeling. The amendment would not render existing finished goods inventories, or works in progress, unusable. Thus, there would likely be no environmental impacts on air or water quality or other aspects of the environment if the proposed amendment were issued as a final rule.

Conclusions

If the Commission promulgated the proposed technical amendment to the flammability standards for carpets and rugs:

- The current industry practice of using equivalent methenamine tablets would continue without interruption;
- The effectiveness of the standards would be unaffected, and testing costs to manufacturers and importers would not increase, so the net impact on benefits and costs would be essentially zero;
- No reasonable regulatory alternatives exist that would further reduce testing costs;
- There would be no significant impacts on small firms or other small entities; and
- There would likely be no significant environmental impacts.

TAB B



United States
CONSUMER PRODUCT SAFETY COMMISSION
Bethesda, Maryland 20814

MEMORANDUM

DATE: February 12, 2007

TO : ES

Through: Todd A. Stevenson, Secretary, OS

FROM : Martha A. Kosh, OS

SUBJECT: Carpet and Rug Technical Amendment

ATTACHED ARE COMMENTS ON THE CH 07-2

<u>COMMENT</u>	<u>DATE</u>	<u>SIGNED BY</u>	<u>AFFILIATION</u>
CH 07-2-1	12/11/06	Paul T. O'Day President	American Fiber Manufacturers Association 1530 Wilson Blvd., Suite 690 Arlington, VA 22209
CH 07-2-2	3/22/07	Raminder Sidhu	<u>rs.sidhu@ties.itu.int</u>