



8551 Esters Blvd.  
Irving, Texas 75063

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MFR/PRV LBR NOTIFIED 7/24/09  
COMMENTS: YES  NO  
OVERRULED; ATTACHED   
EXCISIONS FOLA Hrs. :  
 DO NOT RE-NOTIFY  RE-NOTIFY

July 13, 2009

Howard N. Tarnoff  
Lead Trial Attorney  
Division of Compliance  
Office of the General Counsel  
U.S. Consumer Product Safety Commission  
4330 East-West Highway  
Bethesda, MD 20814

Dear Sir or Madam,

SunL is fully committed to the goal of reducing ATV-related accidents. We have implemented new policies in accordance with the rules set forth by Section 232 of the Consumer Product Safety Improvement Act of 2008. The actions outlined below are part of our continuing effort to promote safe and responsible use of our ATVs.

**Age Recommendations**

SunL will only recommend, market, and sell ATVs for use under the age category/speed guidelines specified at Section 6 of the ANSI/SVIA 1-2007 Standard for ATVs ("the ATV Standard"). SunL will not recommend, market, advertise, or sell adult-sized ATVs for the use of persons less than 16 years of age. SunL will use its best efforts to ensure that our dealers comply with these requirements.

**Dealer Monitoring**

SunL requires that its dealers verify the intended ATV rider's age prior to selling that rider or his /her guardian an ATV. SunL warranty registration cards require the identification of the intended rider's name and date of birth to ensure that dealers do not sell SunL ATVs to under-aged riders.

SunL will use its best efforts to obtain dealer compliance with the age recommendation requirements of the ATV Standard. SunL will conduct a minimum of 50 on-site, undercover inspections per year of our authorized ATV dealers by means of independent, undercover investigators (also known as "secret shoppers") to ensure that these dealers follow age requirements and other safety related practices during sales or promotional functions. SunL will conduct these inspections of each of its dealers at least twice a year.

SunL will also modify the visitation criteria of its field support staff so that inspecting for dealer compliance becomes a normal function of the dealer visit.

In addition to on site, undercover inspections of its dealers, SunL will conduct regular telephone "secret shopper" calls to ensure that its dealers are complying with the age recommendation requirements of the ATV Standard.

When SunL learns of dealers who do not abide by the age requirements of the ATV Standard, it will arrange follow-up inspections. If SunL finds evidence of continued violation, SunL will take remedial action, up to and including possible termination or non-renewal of the dealer's contract with SunL.

### **Information and Education Effort**

This section outlines the information and education program developed by SunL Group, Inc. ("Company"). The company intends to implement the program as part of their continuing efforts to promote safe and responsible use of ATVs. This program will be implemented immediately for a 10 (ten) year duration with monthly reviews conducted by SunL's management, including the Chief Compliance Officer and the General Counsel.

The company's legal counsel has thoroughly reviewed relevant research involving focus groups and other research that were used to identify appropriate message treatments and media for distributing them.

After extensive research and review, the outlined elements of the program are as follows:

**CD-ROM** The Company intends to create a CD-ROM program that will convey ATV safety information in a competitive, visually exciting manner that resembles the types of interactive video simulations that pre- and young teens find entertaining. The CD-ROM will be designed to provide a new and exciting way to warn children against the use of adult-sized ATVs and to teach them about other risks associated with ATV use.

**Website** SunL Group, Inc. will encourage dealers to promote the importance of ATV safety by recommending that each purchaser visit the ATV Safety Institute's website to learn more about the safe operation of an ATV. In addition, SunL Group, Inc. will provide dealers information about the danger of unsafe riding. The Company also intends to expand their individual company websites to the extent feasible to provide on-line access to a rendition of the CD-ROM program and other safety information. The Company hopes to provide on the website, a link to download the materials found on the CD-ROM.

**Safety Reminders** The Company will launch a correspondence program directed to parents purchasing new ATVs. A letter to the parents incorporating safety messages and safety alerts for children will be provided to the customer via the dealer. This letter will reference the ATV Safety Institute's website.

**Targeted Distribution of Safety Materials** Company intends to distribute the aforementioned safety posters to pediatric offices, schools, and public libraries on a national level so that these materials may target children in the hopes of keeping children informed of safety precautions. Additionally, Company intends to distribute 6 page safety brochures to dealers in order to target individual consumers. Additionally, it is the intent of the company that safety brochures will be mailed directly to individual consumers subsequent to their purchase in order to act as a post purchase reminder of safety measures that a consumer should abide to. Further, these brochures will incorporate valuable safety messages to parents in regards to child safety warnings and precautions.

**Print Ad Campaign** The Company hopes to integrate information about the availability of the new CD-ROM program in their general ATV advertising during the first year of the program's creation. SunL's print advertisements will feature safety messages communicating the importance and availability of safety training. SunL's print advertisements will feature safety messages for 10 (ten) years.

### **Training**

SunL will offer free, hands-on, interactive training to all SunL ATV purchasers. This free training will be extended to the buyers' immediate relatives who are age appropriate for the ATV purchased. This training will be conducted through the existing educational programs of the ATV Safety Institute ("ASI").

SUNL will incorporate in its packaging a letter that clarifies the manner in which a customer may receive the aforementioned training. Additionally, dealers will be notified and supplied with materials, and Company will instruct all dealers to disclose the importance of available training to each purchaser.

After completion of the ASI course, the rider will qualify for an incentive worth \$100. The \$100 incentive for training will include at least \$50 in cash, with the balance offered (at the consumer's choice) as a rebate for already purchased safety equipment or a credit towards the purchase of new safety equipment.

### **Advertising**

When preparing and presenting advertising and promotional materials, SunL will depict the safe and responsible operation of ATVs. The use shown will be appropriate to the ATV, the age of the operator, and the depicted situation. ATV riders depicted in advertising and promotional materials will wear helmets and full protective gear. These marketing materials and presentations will contain the safety message described in Section J.1. and Appendix K of the 1988 ATV Consent Decree and will contain information about the availability of operator training. SunL will use its best efforts to promote dealer compliance with the advertising requirements.

### **Toll-Free Safety Hotline**

SunL will provide a toll free, 24 hour hotline to respond to consumer inquiries as described at Section H.4 of the 1988 ATV Consent Decrees. Agents will be trained to provide safety and training information, including age recommendations. SunL's toll-free number will be printed in all owner manuals, ATV web-sites, and other promotional materials.

**ATV Safety Video**

SunL will provide a Safety Video to its distributors for dissemination to all retail purchasers of SunL ATVs. The video shall comply with all requirements described at Section H.3.b.(4)(b) and Appendix I of the 1988 Consent Decrees. SunL will also encourage dealers to promote the importance of ATV safety by recommending that each purchaser visit the ASI website to learn more about the safe operation of an ATV, including watching any safety videos on the website.

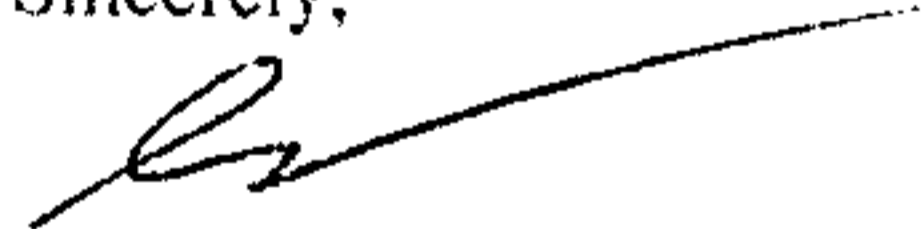
**Safety Alert**

SunL will supply its dealers "Safety Alert" documentation to be provided at the point of purchase to all retail purchasers of SunL ATVs. The document will contain the same substantive safety information as the Safety Alert described at Section H.3.b.(4)(c) and Appendix J of the 1988 ATV Consent Decrees. This information includes: death and injury statistics for the ATVs, safety rules, age recommendations and the availability of safety training.

**Notice of Change**

SunL Group, Inc. will give the Consumer Product Safety Commission at least 60 days advance notice of its intentions to terminate or materially change any commitment under this action plan.

Sincerely,



Shae Armstrong  
General Counsel  
SunL Group, Inc.