



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

July 28, 2020

Mr. Greg Knott  
Vice President, Standards and Regulatory  
Affairs  
Outdoor Power Equipment Institute (OPEI)  
341 South Patrick Street  
Alexandria, VA 22314

Mr. Alex Berger  
General Counsel  
Recreational Off-Highway Vehicle Association  
(ROHVA)  
Specialty Vehicle Institute of America (SVIA)  
2 Jenner, Suite 150  
Irvine, CA 92618

Dear Mr. Knott and Mr. Berger:

CPSC staff is confirming that OPEI and SVIA/ROHVA plan to hold a meeting on Wednesday, September 9, at OPEI's offices in Alexandria, VA, to continue discussions on fire and debris penetration hazards associated with off-highway vehicles.<sup>1</sup> CPSC staff is looking forward to having the opportunity to advance discussion on these important issues. We note, however, that travel may be prohibited, or in-person meetings limited in size, due to the COVID-19 pandemic. If an in-person meeting seems unlikely, CPSC staff will nevertheless plan to attend the meeting on September 9, but will do so virtually instead. In that event, we suggest that a virtual meeting have a more limited agenda focused on fuel systems of off-highway vehicles. Given the fluidity of the situation, Greg Knott and I can finalize the plans closer to the meeting date in September. We thank you for your flexibility and understanding of the restrictions under which we are operating. Despite these restrictions, however, we believe it is imperative to continue work on these important issues by meeting on September 9, whether in person or virtually.

If the meeting takes place virtually, we recommend starting our discussions with consideration of fuel system integrity during rollover in view of the following standards:

- ANSI/OPEI B71.10-2018 –*Standard for Off-Road Ground-Supported Outdoor Power Equipment – Gasoline Fuel Systems – Performance Specifications and Test Procedures*
  - Fuel hose connection tensile test
- ANSI/ILTVA Z130.1-2012 –*Standard for Golf Cars*
  - Rollover containment, Vent leakage resistance
- ANSI/ILTVA Z135-2012 –*Standard for Personal Transport Vehicles*
  - Rollover containment, Vent leakage resistance
- SAE J2044-2009 –*Standard for Quick Connect Coupling Specification for Liquid Fuel and Vapor/Emissions Systems*

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<sup>1</sup> These comments are those of CPSC staff, and have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

Mr. Greg Knott and Mr. Alex Berger  
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CPSC staff is also very concerned with the debris penetration hazard; however, we recognize that a separate virtual meeting might be required to discuss that issue.

I look forward to addressing these important issues at the meeting in September, and will work with you to finalize an agenda nearer to the meeting date.

Please contact me at any time, if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Caroleene Paul". The signature is fluid and cursive, with a large initial "C" and "P".

Caroleene Paul  
Mechanical Engineer  
Division of Mechanical and Combustion Engineering  
Directorate for Engineering Sciences

cc: Patricia Edwards, CPSC Voluntary Standards Coordinator