

25
No comment
by cleared
5/19/83 ltr

FILE



Snapper
(Power Lawn Mowers)

~~RESTRICTED~~

U.S. CONSUMER PRODUCT SAFETY COMMISSION

WASHINGTON, D. C. 20207

8 APR 1982

OFFICE OF THE
GENERAL COUNSEL

#297

Mr. John Ulmer
Legal Officer
Snapper Power Equipment
McDonough, Georgia 30253

Dear Mr. Ulmer:

This letter responds to your letter of January 27, 1982, in which you request a determination of whether Snapper models 21500C and 21500PC are consumer products and thus subject to the Safety Standard for Walk-Behind Power Lawn Mowers, 16CFR Part 1205. The data you have submitted indicate that these mowers are not consumer products because consumers do not appear to "customarily" use them.

As you know, the term "consumer product" is defined in 15 U.S.C. § 2052(a)(J), 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. 92-1153, 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.

In your case, you have submitted the following data which indicate that the current use and distribution patterns of these mowers are such that these mowers do not fall within the definition of the term "consumer product":

1. The weight and cost of these mowers exceed those of the usual consumer mowers.
2. Snapper does not sell directly to retail dealers.
3. To the best of your knowledge, the distributors and dealers of these mowers have not advertised them in consumer publications.

~~RESTRICTED~~

4. Advertising for these mowers **has** been placed in special interest publications for commercial, industrial, and government users.

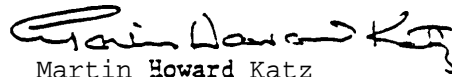
5. These mowers are **low** production items.

6. **The** survey of distributors that you conduct shows that the distributors believe "that nearly 100% of Snapper commercial mowers **aresold** to commercial users, not to consumers."

Our technical staff has reviewed the information which you submitted, and no **information** that would contradict any of the factors mentioned **abovehas** been brought to our attention. Therefore, **based** on all of these factors, we reached our conclusion that, at the present **time**, the use and distribution patterns of these mowers **are** such that they are not consumer products.

We **wish** to stress, however, that this determination is based **primarily** on the information supplied by you, and, **if** data showing different use or distribution patterns become **available,our determination** could change. For example, some of the business purchasers mentioned in the survey may have been rental **firms** that could conceivably rent some of the mowers for consumer use. In addition, if consumer use **patternswere tochange** in the **future** so that these mowers would be used more than occasionally by consumers, they could then be considered subject to the **standard**.

Sincerely,


Martin Howard Katz
General Counsel

~~RESTRICTED~~

a recoasideratioo of which of these mowers should be subject to the
s taadard.

cc:

Harleigh Ewell, OGS ✓

UNITED STATES GOVERNMENT
Memorandum

FILE

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

TO : Carl Blechschmidt, OPM
Through: Margaret A. Freeston, Acting General Counsel
Stephen Lemberg, Assistant General Counsel SL
FROM : Harleigh Ewell, OGC HE

DATE : FEB 17 1982

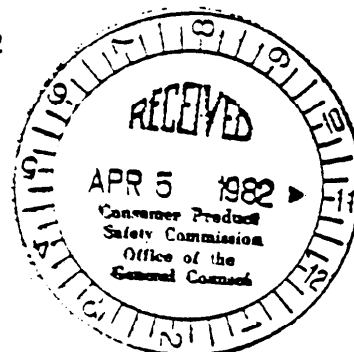
SUBJECT: Request by Snapper for a Determination That Certain Mowers
Are Not Consumer Products Subject to the Mower Standard

Attached is a request from Snapper Power Equipment for a determination that certain of their mowers are not consumer products. Please obtain any staff comments that may shed some light on this determination.

~~RESTRICTED~~

March 31, 1982

Margaret Freeston, Esq.
Acting General counsel
Consumer Products Safety Commission
Washington, D. C. 20207



Dear Ms. Freeston:

This letter is a follow-up to my letter to you dated January 27, 1982, which requested a determination that Snapper commercial walk-behind lawnmowers do not constitute "consumer products" within the meaning of the Consumer Products Safety Act, 16 USC 2501 et seq, and the Commission's safety standard for walk-behind power lawnmowers, 16 CFR Part 1205. Two months have past and we have received no response to our request.

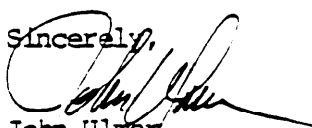
As you know, a similar request was made for The Toro Company, by letter dated October 14, 1981, and a favorable Advisory Opinion was rendered regarding Toro products December 1, 1981.

As pointed out in my letter of January 27, 1982, the Snapper commercial mowers are substantially similar to the Toro commercial mowers, and likewise do not constitute "consumer products" based upon all the criteria contained in your Advisory Opinion of December 1, 1981.

/ It is extremely important that we receive a response to our request as soon as possible. Production plans must be made now, and resources must be irretrievably committed now.

Any further delay in responding to our request will result in a detrimentally unfair competitive disadvantage to Snapper. All we ask is that we receive prompt, fair and equal treatment consistent with your previous ruling.

Sincerely,


John Ulmer
Legal Officer

bt
Certified Mail # P32 9974757



~~RESTRICTED~~

UNITED STATES GOVERNMENT

Memorandum ~~RESTRICTED~~

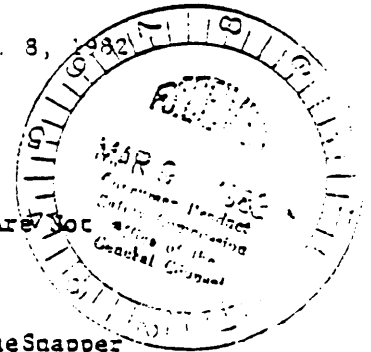
U.S. CONSUMER PRODUCT
SAFETY COMMISSION
WASHINGTON, D.C. 20207

TO Carl W. Blechschmidt, EX-P

DATE: Mar. 8, 1982

THRU: Walter Z. Hobby, Acting AED, Economics
FROM William W. Zamula, ECCP *WZ*

SUBJECT: Request by Saapper for a Determination That Certain Mowers Are Not
Consumer Products Subject to the Mower Standard.



This is in response to **your request** for **comments on the Saapper Power Equipment Letter of January 27, 1982**. Saapper is requesting **a determination** that commercial models (21500 C and 21500 PC) are **not consumer products** as was done for **seve-a? Toro models** in OGC's Dec. L, 1981, letter to James F. Rill.

We find the submission very similar to **the** Toro submissions of October 14, 1981. The **products involved** are quite similar, as are the advertising practices of the **two companies** with regard to the **mowers** in question.

The differences between the **two situations** are the level of documentation, the difference in distribution practices, and the differing sales volume. In regards to **ownership issues**, Saapper **relies on anecdotal statements** by distributors while Toro used **warranty cards** as the basis for its **assertions**. Saapper evidently relies **more heavily** than Toro on the **two-staged distribution process** and **tends to service** commercial accounts through the retailer rather than the distributors. It also appears that **commercial sales** make up a larger proportion of Saapper's total sales than **Toro's**.

These differences, **notwithstanding**, marketing of the **Saapper mowers**, appears to be directed at the same **commercial users** as the **Toro mowers**, as is indicated by the **publications** in which they are advertised. **We therefore recommend a determination** that the **Saapper models 21500 C and 21500 PC** not be subject to the standard.

When **complying mowers** become **widely available** (especially the blade-brake-clutch and power-restart varieties) some of the differences between so-called "consumer" and "commercial" models may be reduced. Complying mowers may weigh several pounds **more**, and the price differentials between complying **mowers and commercial powers** will be less than they are currently. The essential question is **not** the weight, price, or engine horsepower of the commercial mower, but the end-users. As long as the advertising of the commercial mower is distinct from consumer advertising and the unit volume of mowers involved is relatively small, we see **no reason not to grant similar determinations for other manufacturers of commercial mowers**. If, however, there appear to be significant leakages of these products into consumer use in the future, and the manufacturer is unable to document who the purchasers were, we suggest

4

~~RESTRICTED~~

January 27, 1982

CERTIFIED MAIL
NO. 132 9974851

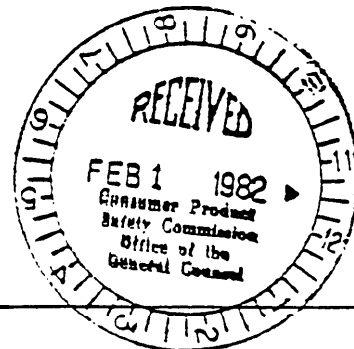
MS. Margaret Freeston, Esq.
Acting General Counsel
Consumer Product Safety Commission
Washington, DC 20207

Dear **Ms.** Freeston:

This letter is a request on behalf of Snapper Power Equipment, Division of Fuqua Industries, Inc. (hereinafter **referred** to as "Snapper") for a determination, pursuant to 16 CFR Section 1000.7, of the Consumer Product Safety Act as it applies to the Commission's Safety Standard for Walk-Behind Power Lawn Mowers, 16 CFR Part 1205. Snapper requests a determination that Snapper commercial walk-behind lawn mowers, as described herein, do not constitute "consumer products" within the meaning of the Consumer Product Safety Act, 16 USC Section 2501, et seq. and of said safety standard.

Reference is made to your letter dated December 1, 1981 addressed to Mr. James F. Rill of the law firm, Collier, Shannon, Rill & Scott, in which you rendered an Advisory Opinion that certain lawn mowers manufactured by The Toro Company (hereinafter referred to as "**Toro**") are not consumer products and, therefore, are not subject to the Safety Standard for Walk-Behind **Power** Lawn Mowers, 16 CFR Part 1205.

Snapper manufactures two models of commercial walk-behind lawn mowers, Model 21500C (21 inch Cut, 5 HP, Push) and Model 21500PC (21 inch Cut, 5 HP, Self-Propelled). These Snapper commercial mowers are substantially similar to the Toro commercial lawn mowers which are the subject of your Advisory Opinion. The Snapper mowers, superior in performance and durability, are similar to the Toro mowers in design, weight and price characteristics, advertising and marketing scheme, and type of users.



Ms. Margaret Freeston, Esq.

Page 2

January 27, 1982

Snapper's efforts to develop and manufacture a commercial mower began in 1975. In December 1975, Hr. Don Weakley, Vice President & Sales Manager, provided information to the distributors regarding preliminary specifications of these mowers. The distributors were requested to complete a questionnaire and provide input into Snapper's commercial mower development program. Distributor interest in a commercial mower resulted in a continuation of developmental work. In August, 1976, at Snapper's national distributors meeting, Snapper's first commercial mowers were introduced. Mr. Cliff Boylston, Vice President-Engineering, addressed the distributors regarding the special features of the commercial mowers. Effective for that model year beginning September '1, 1976, these mowers were identified as "Heavy-Duty Commercial Mowers" in the marketing program materials, and have been identified in the same manner since that time.

These mowers have been described in our advertising as "Commercial Mowers" since their introduction in 1976. Advertising has been placed in special interest publications such as Grounds Maintenance and Rent All magazines which are for commercial users. (See enclosed advertisement, Exhibit I, and advertising literature, Exhibits 2 and 3). These commercial mowers are also advertised in the Thomas Register which is used by purchasing departments of industrial firms and governmental agencies. No commercial mower advertising mats, radio scripts, television commercials, or billboard posters have been prepared for advertising to the general public. Moreover, distributors and dealers have not advertised these commercial mowers in consumer publications, to the best of our knowledge.

Snapper's commercial mowers are powerful, heavy-duty equipment designed for continuous operation under the demanding conditions imposed by commercial users. The relative weight and price* of Snapper commercial models and consumer models are as follows:

<u>Model</u>	<u>Weight & Price*</u>	<u>Comparable Consumer Models</u>
21500C	89 Lbs. \$440	70 Lbs. \$279
21500PC	104 Lbs. \$550	86 Lbs. \$389

Snapper walk mower Models 21400 and 21400P are "in between" commercial and consumer mowers and cannot be classified as either, inasmuch as a large percentage of commercial users purchase such models. However, because they are not predominantly used commercially, we do not seek to have these models excluded from coverage of the Safety Standard. The weight and price* of these models are as follows: Model 21400 - 71 Lbs. & \$302; Model 21400P - 87 Lbs. & \$412.

*Suggested Retail Price.

8

' Ms . Margaret Freeston, Esq.

Page 3

January 27, 1982

Although Snapper's consumer mowers are tough, dependable and durable, they are not designed for the rigorous, heavy-duty requirements of commercial operators, as are the Snapper commercial mowers. The principal difference in the features of Snapper commercial-and consumer mowers are as follows:

- 1) Handles: Commercial mower handle **structure** includes stronger, 16 gauge steel tubing, steel reinforcing straps, and heavy-duty handle supports. The handles are longer to accommodate the large commercial bag, and higher overall for generally larger operators.
- 2) Grass Bag: Commercial mower bags have 50% more volume and weight capacity (**3 1/4** vs. **2 1/2** Bushel Capacity).
- 3) Ground Speed: Commercial **self**-propelled model is 15% faster at maximum speed than the comparable consumer model, due to larger crankshaft pulley.
- 4) Drive Belt: Commercial mowers have "**Kevlar**" cord construction for heavy-duty application and longer life.
- 5) Throttle Control: Commercial mowers have all metal construction and larger diameter inner wire.
- 6) Wheels: Commercial mowers have steel rims and ball bearings as opposed to plastic rims and bushings.
- 7) Tires: Commercial tires, molded from premium grade rubber, **are** wider with thicker walls.
- 8) Gas Tank: Commercial mowers have 100% greater capacity gas tank (**2** quart vs. **1** quart tank).
- 9) Air Cleaner: Commercial mowers have dual element air cleaner, the same as the Toro commercial mowers.
- 10) Engine: Commercial mowers have heavy-duty, **5** H.P. industrial/ commercial engine, the same as the Toro 5 H.P. commercial mowers. Engines on consumer mowers are generally 3.5 H.P., and do not exceed 4 H.P.

Snapper commercial mowers are low volume production items. The domestic unit sales for the two most recent model years are as follows:

<u>Model</u>	<u>MY 1980</u>	<u>MY 1981</u>	<u>Total</u>
21500C	2,645	4,720	7,365
2iSOOPC	6,486	<u>10,612</u>	<u>17,098</u>
	9,131	15,332	24,463

Ms. Margaret Freeston, Esq.

Page 4

January 27, 1982

Snapper sells exclusively to wholesale distributors, some of whom sell to retail customers. Otherwise, Snapper does not sell directly to retail dealers, and does not sell directly to retail customers. Therefore, the distributors are the best available source of information regarding the type of purchasers of Snapper commercial mowers. Snapper conducted a survey of distributors for several geographic sections of the country; who sell a substantial portion of the Snapper commercial mowers. The results of that survey are provided by the enclosed letters from those **distributors** (Exhibits 4 thru 10). The letters indicate that nearly 100% of Snapper commercial mowers are sold to commercial users, not to consumers. This finding is consistent with the design, function' and purpose **of** these heavy-duty commercial mowers.

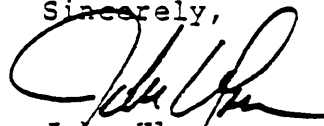
As indicated, Snapper commercial mowers are relatively low volume production items, *with a small percentage sold to consumers. Snapper commercial mowers are not advertised and marketed the same as Snapper consumer mowers. Also, Snapper commercial mowers' weight and prices are more than those of the usual consumer mowers.

Moreover, Snapper commercial mowers are substantially similar to the Toro commercial mowers, which were addressed by your Advisory Opinion, in design, function, purpose, weight and price characteristics, advertising and marketing scheme, and type of users.

Based on all these factors, and in the interest of **uniform** and consistent administration of the laws and regulations, we hereby request a determination that Snapper commercial mowers are not consumer products within the meaning of the Consumer Product Safety Act, 15 USC Section 2501 et seq., and the Safety Standard for Walk-Behind Power Lawn **Mowers**, 16 CBR Part 1205.

Because of the confidential, restricted and **proprietary** nature of the contents of this letter, we hereby request that this letter and all correspondence pertaining hereto be exempt from public disclosure.

Sincerely,



John Ulmer
Legal Officer

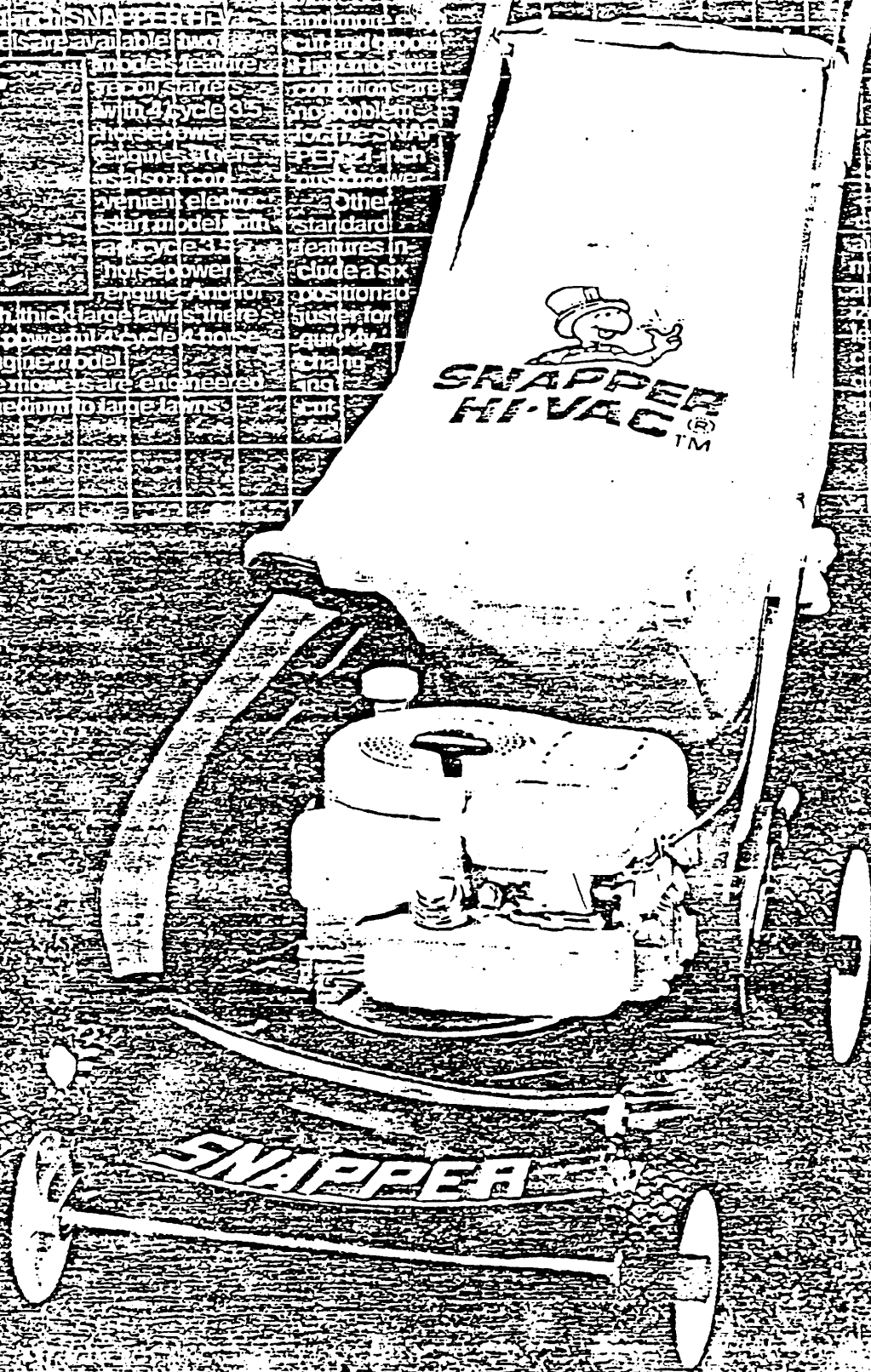
JU/cm
Enclosures

Snapper's 21-inch Hi-Vac...pride of large push mowers

Four 21-inch SNAPPER Hi-Vac push models are available. Two of the models feature 3.5 horsepower engines. The other two models feature 4 horsepower engines. And for those lush, thick large lawns, there's a more powerful 4 cycle 4 horsepower engine model. These mowers are engineered for all medium to large lawns.

that don't require a self-propelled machine. All Hi-Vacs do a superb job of cutting grass. The powerful vacuum cleaner by the patented Hi-Vac deck and blades suck up grass and more debris. And more easily cut and chop. High moisture conditions are no problem for the SNAPPER 21-inch push mowers. Other standard features include a six position adjustable suspension for quick changing of blades.

cutting height from 1 to 3 1/2 inches. The blades are mounted on a full length solid steel axle for extra strength and long wheel life. The SNAPPER 21-inch Hi-Vac push models are also versatile machines with optional Mulcherizer for mulching cuttings and the Snapperizer for shredding leaves. Side discharge and rear grass catching kits are also available.



THIS



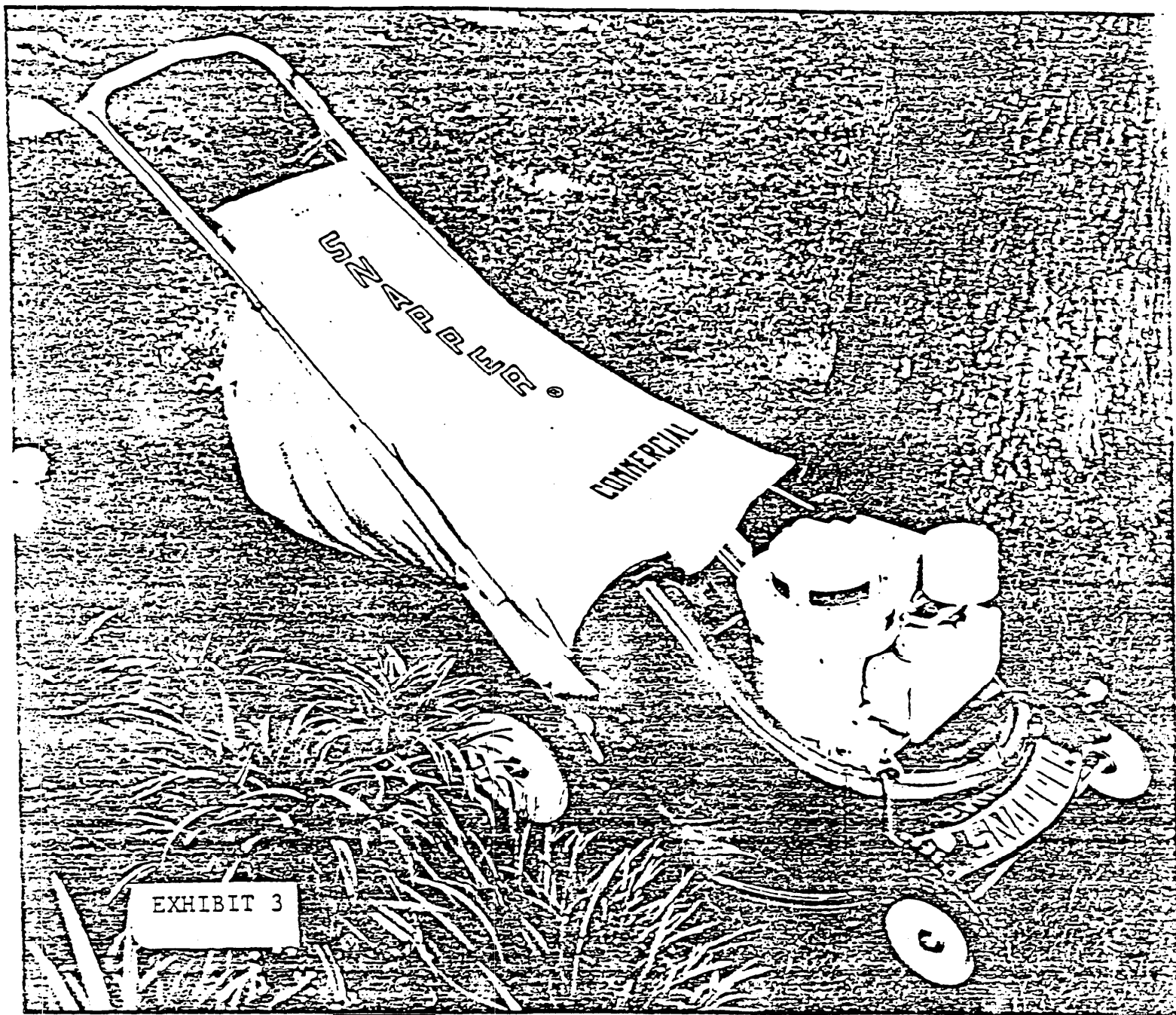
EXHIBIT 1

ANY WAY YOU CUT IT, IT'S A SNAPPER



SNAPPER®

"Commercial" Mowers



When you're looking for a mower which can handle the toughest jobs with professional ease, look to SNAPPER "Commercial" models. SNAPPER has long been known as a mower which does a superior job of cutting grass. These heavy-duty mowers are designed not only to cut grass well but to provide dependable performance under the most severe grounds maintenance conditions.



January 5, 1982

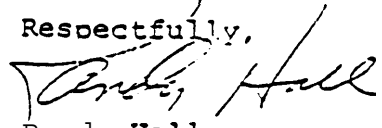
Snapper Power Equipment
Mr. Tony Malizia
P.O.Box 777
McDonough, Ga. 30253

Dear Tony,

In reference to your inquiry about our market for the Snapper lawn mower models 21500C and 21500PC, the mowers are **definitely** commercial units and are sold **primarily** to **commercial users**. I would say **exclusively**, except for very rare circumstances **when** a **consumer** may want one.

In our price sheet **the** unit is referred to as a commercial **lawn** mower. The very nature of it's **design** such as **large** wheels, heavy handles and **large** engine establishes the unit as a commercial lawn mower.

a-
Respectfully,


Randy Hall

AMED

Executive Vice President

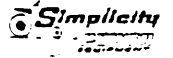
RH/kp

EXHIBIT 4

SNAPPER



BLISS POWER LAWN EQUIPMENT CO.



GENERAL OFFICE AND WAREHOUSE
101 COMMERCE CIRCLE • SACRAMENTO, CA 95815 • (916) 444-1111
BRANCHES: REDDING • SACRAMENTO

December 29, 1981

Mr. A. A. Malizia
Chairman of the Board
Snapper Power Equipment Co.
McDonough, Georgia 30253

Dear Tony:

In answer to your inquiry with reference to the selling of the Snapper 21500C and 21500PC model mowers. I have checked with a cross section of our best dealers, and it is their opinion that the commercial series mowers are sold almost 100% to commercial users exclusively.

I have also enclosed a copy of the State of California 1981 contract for lawnmowers, on which we were fortunate enough to be awarded the order for the heavy duty commercial machines. The light duty portion was awarded to Jacobson for '81.

Sincerely,

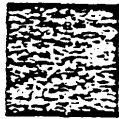
Marshall S. Bliss
President

MSB:ab
Encl.

EXHIBIT 5

BPE

BROWARD POWER EQUIPMENT, INC.



4111 S.W. 76th AVENUE
DAVIE, FLORIDA 33328

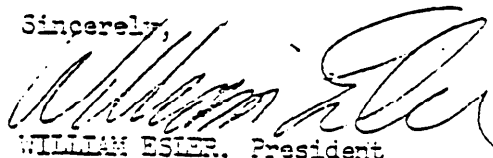
January 5, 1982

Mr. A. A. Malazia
Snapper Power Equipment, Inc.
McDonough, Georgia 30253

Dear Mr. Malazia:

For your information, an analysis of our sales of
Snapper Model 2150CPC walk mower shows that
approximately 97% of this mower's sales are to
commercial users.

Sincerely,



WILLIAM ESLER, President
BROWARD POWER EQUIPMENT, INC.

WE/sk

EXHIBIT 6



BOX 909 • 11100 W. DELAWARE AVENUE SIOUX FALLS, SO 57101 TELEPHONE (605) 336-0520

January 4, 1981

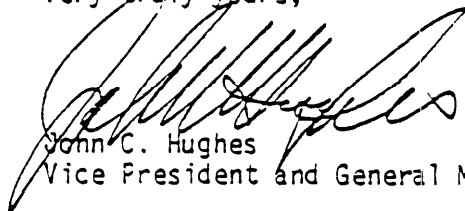
Mr. A. A. Malizia
Chairman
Snapper Power Equipment
McDonough, Georgia 30253

Dear Mr. Malizia:

As your Snapper distributor in the states of Montana, Wyoming, North Dakota, South Dakota, and Nebraska, I want to report to you our sales experience on the models 21500C and 21500PC. We offer both of these mowers to the marketplace solely for commercial use. I have recently researched our sales records, and I find that virtually 100% of these models which we sell are sold for commercial use.

Basically, we find that these models are far too heavy and powerful to be considered by the homeowner. On the other hand, these models are excellent for the commercial lawn care people who require the additional ruggedness and additional horsepower for continuous mowing.

Very truly yours,



John C. Hughes
Vice President and General Manager

JCH:blf

EXHIBIT 7

20



JANUARY 4, 1982

MR. A. A. MALIZIA - C. E. O.
SNAPPER POWER EQUIPMENT
McDONOUGH, GEORGIA 30253

DEAR TONY:

THROUGH A TELEPHONE SURVEY OF OUR SNAPPER DEALERS WE HAVE FOUND THAT APPROXIMATELY 98% OF OUR SNAPPER MODELS 21500C AND 21500PC WHICH ARE SOLD TO OUR DEALERS AS COMMERCIAL UNITS ARE ALSO SOLD TO THEIR CUSTOMERS FOR COMMERCIAL USE ONLY.

SINCE SNAPPER HAS SUCH A WIDE VARIETY OF MULTI-PURPOSE WALK-BEHIND MOWERS TO CHOOSE FROM, THE CONSUMER APPARENTLY FINDS IT UNNECESSARY, AS WELL AS IMPRACTICAL, TO SPEND THE ADDITIONAL MONEY FOR THE PURCHASE OF A COMMERCIAL UNIT FOR USE AT HOME.

IF AT ALL POSSIBLE I WOULD LIKE TO SEE THIS PARTICULAR COMMERCIAL MODEL EXEMPTED FROM ANY CONSUMER SAFETY REGULATION COMPLIANCE.

BEST PERSONAL REGARDS,

A handwritten signature in cursive script, appearing to read 'Steve Redan', is written over the typed name.

STEVE REDAN - PARTNER
KPM DISTRIBUTORS
KPM DISTRIBUTORS - NEW YORK

SR/mgc

EXHIBIT 8

21

RASOR-WEST

DISTRIBUTING CO. INC.

"LAWN AND GARDEN POWER EQUIPMENT"

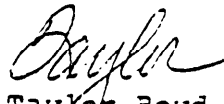
January 6, 1982

Snapper Power Equipment
A. A. "Tony" Malizia, Chairman
Mc Donough, GA 30253

Dear Tony:

In a recent survey of the dealers who sell the most 21500C's and 21500PC's they indicated that virtually all the above mentioned mowers were sold to commercial users.

Sincerely,



Taylor Boyd
General Manager

TB/pm



EXHIBIT 9

22



WHOLESALE INC.

4543 SAMUEL STREET • SARASOTA, FLORIDA 33583 • TELEPHONE: (813) 922-0747

January 4, 1982

Mr. A.A. Malazia, Chairman of the Board
Snapper Power Equipment, Inc.
McDonough, Georgia 30253

Dear Tony;

In checking with our dealer organization through the months of November and December 1981, for the past model year we find that Ninety Eight Per Cent of our Five Horse Power Walk Behind units were sold to commercial accounts.

Our Two salesmen checked our sales records to dealers and verified the above percentage.

Many of the sales were in conjunction with tractor sales.

It seems to me there should be some difference between consumer sales and commercial sales as it applies to the new mandatory laws going in to effect this year.

Hope to hear from you soon.

Very Truly Yours,

A handwritten signature in cursive script, reading 'Raymond E. Russell'. The signature is written in dark ink and is positioned above the printed name and title.

Raymond E. Russell
President.

RER/lr .

23

EXHIBIT 10

FILE - CPSA Sec. 3(a)(1) (Power Lawn Mowers)

21. DEC 1982

Ms. Susan Tucker
Dalager's Sharpening Service, Inc.
820 Second Street
Encinitas, CA 92024

Dear Ms. Tucker

Thank you for your letter of November 8, 1982, concerning certain lawn mowers determined by this office not to be consumer products subject to the Commission's Safety Standard for Walk-Behind Power Lawn Mowers. I should point out that these determinations are legal interpretations based on the information available at the time and that, if additional information showing the mower to be a consumer product became available, our previous determination should not be viewed as an authorization to produce noncomplying mowers.

In response to your specific request, we do not have the resources to automatically notify people about the status of particular mowers. However, if the Commission decided to take action against a noncomplying mower as being a consumer product subject to the Standard, and if it were determined to be appropriate to recall mowers that had already been distributed, the Commission would attempt to see that as many of the manufacturer's customers as possible were notified at that time.

I hope this information is helpful.

Sincerely,

Stephen Lemberg
Assistant General Counsel

Dalager's Sharpening Service, Inc.
820 SECOND STREET . ENCINITAS, CA 92024

24

NOVEMBER 11, 1982

MR. MARTIN HOWARD KATZ
GENERAL COUNSEL
U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D. C. 20207

RE: SNAPPER POWER EQUIPMENT

DEAR SIR:

WE HAVE RECEIVED A COPY OF YOUR LETTER TO MR. JOHN NULMER CONCERNING
THE DETERMINATION OF SNAPPER MODELS 21500C AND 21500PC NOT BEING
CONSUMER PRODUCTS AND THEREFORE NOT SUBJECT TO NEW SAFETY STANDARD
LAWS.

BEING IN THE LAWMOWER BUSINESS, WE ARE CONCERNED ABOUT LEGAL COVER-
AGE, ETC. REGARDING THESE MOWERS AND THE NEW SAFETY STANDARD LAWS.
THEREFORE, IF YOUR DETERMINATION OF THESE SNAPPER MOWER EVER CHANGES
WE WOULD APPRECIATE BEING ON A LIST TO BE NOTIFIED, SO THAT WE MAY
ACT ACCORDINGLY.

THANK YOU,

Susan Tucker

SUSAN TUCKER
DALAGER'S SHARPENING SERVICE, INC.