



OUTDOOR POWER EQUIPMENT
INSTITUTE

April 28, 2015

Ms. Caroleene Paul
Mechanical Engineer
US Consumer Products Safety Commission

RE: April 6, 2015 CPSC Staff Letter to ROVA and OPEI Regarding Voluntary Standards Meetings

Dear Ms. Paul,

Thank you for your April 6, 2015 letter regarding Polaris's yaw rate based vehicle handling metric alternative to CSPC's proposed dynamic instability tests and understeer requirement; and in-turn the suggestion that OPEI "open" its B71.9 Multipurpose Off-Highway Utility Vehicles standard.

As noted in my January 8, 2015 public testimony, OPEI's B71.9 standard is currently open for revision. OPEI submitted a Project Initiation Notification ("PINS") on March 13, 2013 to announce work on a revision of the B71.9 standard. The announcement was published in the ANSI Standards Action Vol. 44, #13 on March 29, 2013. The B71.9 Committee immediately began work on the first revision of the standard, meeting quarterly to review potential improvements to the 2012 standard. And while standard development has been slowed in order to study, conduct testing and prepare comments to CPSC's ROV NPRM, the Committee continues to consider items for the next revision, including the Polaris handling metric proposal.

Through the ANSI process, OPEI members continue to develop and improve product standards to assure outdoor power equipment, including MOHUV's, meet best practices for safety. OPEI appreciates CPSC's participation and we look forward to working with the CPSC staff and interested stakeholders on the current B71.9 revision as soon as committee members have had adequate time to consider the current proposals.

Please let me know if you have questions or comments.

Kind regards,

Greg Knott
Vice President, Regulatory Affairs
Outdoor Power Equipment Institute