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Congress of the United States
House of Representatives

COMMITTEE ON ENERGY AND COMMERCE

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August 19, 2015

The Honorable Elliot F. Kaye
Chairman
Consumer Product Safety Commission
4330 East West Highway, Suite 724
Bethesda, MD 20814

Dear Chairman Kaye,

Thank you for appearing before the Subcommittee on Commerce, Manufacturing, and Trade on Tuesday, May 19, 2015, to testify at the hearing entitled "Oversight of the Consumer Product Safety Commission."

Pursuant to the Rules of the Committee on Energy and Commerce, the hearing record remains open for ten business days to permit Members to submit additional questions for the record, which are attached. The format of your responses to these questions should be as follows: (1) the name of the Member whose question you are addressing, (2) the complete text of the question you are addressing in bold, and (3) your answer to that question in plain text.

To facilitate the printing of the hearing record, please respond to these questions with a transmittal letter by the close of business on Wednesday, September 2, 2015. Your responses should be mailed to Kirby Howard, Legislative Clerk, Committee on Energy and Commerce, 2125 Rayburn House Office Building, Washington, D.C. 20515 and e-mailed in Word format to Kirby.Howard@mail.house.gov.

Thank you again for your time and effort preparing and delivering testimony before the Subcommittee.

Sincerely,


Michael C. Burgess
Chairman

Subcommittee on Commerce, Manufacturing, and Trade

cc: Jan Schakowsky, Ranking Member, Subcommittee on Commerce, Manufacturing, and Trade

Attachment

Additional Questions for the Record

The Honorable Michael C. Burgess

Voluntary Recall Rulemaking & Recall Effectiveness

The Commission's proposed rulemaking regarding "voluntary remedial actions and guidelines for voluntary recall notices" poses a significant risk to the entire voluntary recall process and the Commission's successful, and award winning, Fast Track recall process.¹ The cooperative nature of negotiations between private entities and the Commission is critical to the Fast Track program's success.

There is an extensive record of issues with the proposed rule. The comments received by the Commission during the notice and comment period raised serious concerns about the proposed rule, from making corrective action plans (CAPs) "legally binding" to the imposition of internal compliance programs based on a history of multiple voluntary recalls.²

1. There are a number of open rulemakings included in the Commission's Where does the voluntary recall rulemaking fall within the list of Commission priorities for Fiscal Year 2015 and Fiscal Year 2016?
2. Former Chairman Ann Brown has been extremely critical of the proposed rule on voluntary recalls. She said that it would devastate the agency's successful Fast Track recall program. Do you agree or disagree? Please explain
3. For the last twelve months, how many Fast Track recalls have been completed? What was the average time between initial reporting to final CAP? In the last twelve months, how many instances has the Commission encountered where a company failed to meet its obligations under a CAP entered into through the Fast Track process? In the last twelve months, how many recalls has the Commission initiated under its Section 15 authority? In the last twelve months, how many times has the Commission utilized 16 C.F.R. § 111520(b) to obtain a binding consent order agreement with a recalling firm?

Chronic Hazard Advisory Panel (CHAP) Report on Phthalates

Concerns have been raised about the process utilized in the development of the Chronic Hazard Advisory Panel on Phthalates (CHAP) and the report released this July. Due to the fact that the CHAP report is likely to be the basis for promulgating a major rule on the use of phthalates and phthalate alternatives, it is important that the CHAP's findings and recommendations have been thoroughly reviewed.

The Office of Management and Budget (OMB) has guidelines in place for "highly influential scientific assessments."³ We are concerned that the process for developing the CHAP report did not abide by the OMB's guidelines which include a public comment period for draft scientific

¹ CPSC Docket No. CPSC-2013-0040.

² <http://www.regulations.gov/#!documentDetail;D=CPSC-2013-0040-0003>

³ http://www.whitehouse.gov/sites/default/files/omb/assets/omb/memoranda/fy2005/m05-03.pdf?j=63887477&e=robert_flagg@americanchemistry.com&l=1012442 HTML&u=1415662833&mid=10088079&jb=0

assessments.⁴ Peer review is a critical component of scientific review and the OMB guidelines were released as part of an effort to “improve the quality of the scientific information upon which policy decisions are based.”

In developing its report, the CHAP used National Health and Nutrition Examination Survey (NHANES) data available from the Centers for Disease Control and Prevention (CDC) from 2006. However, additional CDC NHANES data was released in 2008, 2010, and 2012 prior to the release of the CHAP’s findings. We are concerned that the CHAP did not utilize the most current data in its development of the report as well as understanding what impact old data has on the findings.

Finally, the potential precedent-setting cumulative risk assessment utilized by the CHAP is a novel methodology that remains in its formative stages and has not been utilized by any other federal agency as the basis for a major rulemaking. Given the Commission’s obligations under the Information Quality Act and the process issues outlined here, I remain gravely concerned about the results of the CHAP report being utilized without further scrutiny by the Commission.

1. At the March 19, 2015 hearing, you testified that you support a public review and comment period of the staff analysis of the CHAP Report with respect to the pending phthalates rulemaking proceeding. What is the time frame for this new public review and comment period? Please explain the time frame, how this activity will impact the pending rulemaking proceeding, and how the Commission will respond to commenters concerns with the staff analysis package.
2. I understand the Commission staff is analyzing newer exposure data on phthalates, but there is not much data on recent exposures of pregnant women or infants. Is there reason to believe that these groups have significantly different exposures than women or children generally? Is there reason to believe that these two groups would not see the same downward trend in exposure to DEHP, the phthalate that dominates the hazard analysis?
3. In its previous work on phthalates, the Commission conducted its own exposure study. If data gaps exist within the universe of available data, has the Commission considered conducting its own exposure study? What was the result of that consideration?

Window Coverings

In October 2014, the Commission voted unanimously to begin the rulemaking process leading to a mandatory safety standard for new window coverings. Currently, two American National Standards Institute (ANSI) standards have been developed with industry partners regarding corded window covering products and corded horizontal louver blinds with metal slat. For products already installed in homes and businesses, the Window Covering Safety Council provides free retrofit devices for consumer with bottom-up top-down style window covering; roman shade window coverings; roll up type shades/roller blinds; miniblinds, horizontal blinds and pleated shades (purchased before 1995); miniblinds, horizontal blinds and pleated shades (purchased after 1995); and vertical blinds and traverse-rod draperies.

The Commission has been working with industry for two decades on this issue.⁵ To address this serious issue, it is important to ensure that the Commission’s activities are directed at addressing issues that pose the highest risk.

⁴ See Information Quality Act, Sec. 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001, P.L. 106-554.

1. The statute governing the Commission clearly states that the Commission must rely on the voluntary standard process whenever possible. For the past two years there has also been report language from Congress urging the Commission to work cooperatively with the industry to address the window covering issue. The initiation of rulemaking with an Advanced Notice of Proposed Rulemaking (ANPR) seems to contradict the direct from Congress and indicates an abandonment of the voluntary standards process. How many full-time equivalent (FTE) hours have been spent by the Commission on this issue in the last five years? How many FTE hours have been spent by the Commission on this issue from the development stages of the current ANPR?
2. Will the ANPR, a result of the Commission's recent approval of petition C 13-2 (requesting a mandatory standard for corded window coverings), analyze the risk associated with existing window coverings installed in homes and businesses across the country as compared to the risk presented by newly manufactured window covering products?
3. Are there voluntary industry standards that the Commission staff will examine in preparing the ANPR? If so, please explain.
4. In a letter dated July 22, 2014, your staff has asked the window covering industry to include in the voluntary standard an operating cord of no more than 8 inches. If the Commission decides a mandatory standard is warranted are you required by statute to set performance standards instead of a prescriptive standard? Please explain how the requested 8 inch operating cord is a performance standard and not a prescriptive standard? Have there been any discussions between the Commission staff and industry engineers to discuss the technical issues presented by staff's request for an 8 inch cord?
5. Please explain how the Commission, and Commission staff, has evaluated concerns about the 8 inch cord length request from staff on vulnerable populations including the elderly and handicapped.
6. I understand 80 percent of incidences are occurring on non-compliant products. What role do you think education plays in addressing this hazard? Please detail all consumer outreach programs initiated by, and participated in by, the Commission in the last five years. What cooperation has occurred between the Commission and industry in conducting consumer outreach? How much did the Commission spend during the last fiscal year on consumer outreach efforts to address this issue?

Flame Retardant Petition

1. Should the Commission consider the flame retardant petition, how will it coordinate with the U.S. Environmental Protection Agency (EPA) and the other government agencies that the Chairman mentioned during the hearing? Furthermore, how will it take into account previous and ongoing assessment of specific flame retardant chemicals by EPA and other national jurisdictions?

⁵ <http://www.cpsc.gov/en/Recalls/2001/CPSC-Window-Covering-Industry-Announce-Recall-to-Repair-Window-Blinds/>

2. Should the Commission consider the petition, how will it take into account ongoing work by the Commission and other government and standard setting bodies to assess flammability standards?
3. Should the Commission consider the petition, how will it take into account information from the National Fire Protection Association that indicates upholstered furniture can be a major source contributing to fires even if not the first thing ignited? Specifically, application of new methodologies for analyzing fire statistics of upholstered furniture demonstrated that one-quarter of upholstered furniture fires, civilian injuries, and direct damages, and one-fifth (21%) of associated civilian deaths are associated with fires in which upholstered furniture is the primary item contributing to fire or flame spread but not the item first ignited. Please explain.

Fireworks

1. As we near the 4th of July weekend, I note that consumer fireworks are one of the most important product categories under the jurisdiction of the Commission. The agency estimates that there are about 12,000 consumer injuries per year associated with the use of consumer fireworks, about 2/3 of which require medical treatment. Despite this fact, and despite the fact that there continue to be significant changes in the variety and types of consumer fireworks, the Commission has not updated its mandatory fireworks standards in many years. Moreover, the agency has had an open rulemaking on fireworks for about eight years with no apparent result to date in terms of modernizing some of the more badly outdated provisions of those regulations. And most recently, the Commission voted as part of its FY 2015 Operating Plan to direct staff to start over and provide the Commission with a list of regulatory options by the end of the fiscal year. When is the Commission going to revise the fireworks regulations, and specifically what staff or other resource commitments will be made to update these regulations?
2. The “ear test” has been used for decades by the Commission to listen to the sound of the break charge of an aerial fireworks device to see if it sounds too loud, in violation of the Commission’s prohibition on such fireworks that are “intended to produce an audible effect,” which in turn is intended to avoid the potential hazard of these devices creating too much pressure when they go off. My understanding is that the agency staff worked for three years to develop a more objective test method, the “cage” or “pressure box” test, but that as part of the FY 2015 Operating Plan, the Commission does not appear to have a plan to move forward with the new test method. What is the status of the “cage” or “pressure box” test at the Commission? Please explain.

Import Surveillance & Sec. 1110 Rulemaking

1. The Commission wants to improve its targeting at the ports. What information would be the most valuable to you for that purpose and why? Do you need additional authority to obtain the data you need?
2. Many agencies, including the Commission, are working with Customs and Border Protection (CBP) to develop a “single window” system for imports. At the same time, I understand that the Commission is building a separate “registry” for companies to send electronic certificate information. How is that consistent with the “Single Window” approach?

3. In the Commission's FY 2015 appropriation, the agency received \$4 million for import safety. In terms of co-located CPSC staff, how many additional ports are you able to cover as a result of that increase?
4. Commissioner Mohorovic has testified that imported products make up 80 percent of our recalls not because they are more dangerous but because there are so many imports. Do you agree? Does your market surveillance show the same rates of compliance for domestic and imported products?

Import Fee Authority

The Commission's request for authority to impose user fees on importers is a novel area for the agency. The fee request does not include a plan for implementation or detailed calculation of the program's costs. When user fees exceed programmatic costs, or when they are not clearly and closely tied to funding the program alone, the user fee is no longer a fee but a tax.

Import surveillance is an important point in the supply chain where U.S. jurisdiction and pre-market review can be completed on products. However, there is little public information available regarding the pilot risk assessment methodology (RAM) surveillance system. Further, fundamentally altering the process for filing certificates of compliance, a critical component of the import surveillance process, remains in flux. The Commission held a public workshop this fall in response to overwhelming concerns expressed during the notice and comment period. I have serious reservations about expanding a program to a nationwide endeavor without a coordinated strategy that is based on objective evidence and experience born out through a fully vetted and examined pilot process.

1. Please provide an explanation of the status of the RAM pilot program including information about scope, participants, goals and performance metrics, and discussions with other agencies whose cooperation has been necessary for implementation.
2. Please provide a detailed basis for the Commission's cost estimates for the user fee and how will those fees be applied to the import surveillance program? What accountability metrics will be in place?
3. The Commission's 2016 Performance Budget Request states that the "CPSC has the necessary financial reporting and transactional capabilities to record import surveillance program costs correctly and fund only those costs using the product safety user fee." Please detail both the financial reporting capabilities and transactional capabilities discussed in the request.

Test Burden Reduction

In August 2011, P.L. 112-28 was enacted with a clear emphasis on reducing third party testing burdens "consistent with assuring compliance with any applicable consumer product safety rule, ban, standard or regulation." Over three years later, the Commission has requested public comment and held a stakeholder workshop on April 3, 2014 but projects to achieve test burden reduction are not prioritized in the Commission's budget or operating plan. This is particularly concerning with respect to the determinations list of product exempt from lead testing, the phthalates rule, or heavy metal requirements in ASTM F963. On October 1, 2013, several Members of Congress sent a letter to the Commission raising concerns about the prioritization of third-party testing burdens in the Commission's agenda. I am interested in an update since the FY 2015 budget was approved with additional funds directed to testing burden reduction.

I am concerned by the fact that the Commission cites a lack of resources to complete the actions it voted to pursue in October 2012 when there have been several other activities initiated by the Commission since then that diverted resources away from this congressionally-prioritized issue. Please provide budget details necessary to complete any items detailed in your responses to the above questions that are on hold or have not been considered due to resource limitations.

1. Please provide an update on the status of the nine cost-reduction opportunities the Commission voted to pursue in October 2012. Please include a discussion of how the \$1 million directed to these efforts in the FY 2015 budget have been allocated.
2. What is the Commission's current plan regarding reducing testing burdens for third parties as contemplated by P.L. 112-28?
3. What specific steps will be taken to implement each element of the Commission's plan in the next six months? The next year?
4. The mandatory ASTM F963-11 toy standard specifies limits on the concentration of eight heavy elements in paints and accessible substrate materials for children's toys. By regulation, the Commission has made the determination that certain materials will never contain levels of lead above the lead content limit. There are seven outstanding heavy metals currently regulated by ASTM F963-11. Has the Commission evaluated the seven outstanding heavy elements to make a similar determination to limit unnecessary testing? Please provide a status update for determinations of each of the seven elements and if no action has been taken for any of the outstanding heavy elements please explain why not.
5. What is the status of efforts to reduce the current duplicative testing requirements for the ASTM F963-11 toy standard, ISO 8124, and EN-71?
6. Last September, you and Commissioner Mohorovic sent Sen. Thune a letter describing your plan for test burden reduction. One of the items you mentioned was the idea of exempting testing for "de minimis" amounts of prohibited substances. In the staff's report to the Appropriations Committee earlier this year there was no mention of this project. Please provide a detailed status update for this plan and a timeline of execution for the next six months and one

Recreational Off-Highway Vehicles

1. Will the Commission issue a final mandatory rule concerning recreational off-highway vehicles (ROVs) in 2015?

1. Chairman Kaye, I have some concerns that the CHAP report recommendations rely on novel scientific assessment methodologies that have not been used as a basis for regulating. As I understand it, your charge was to “evaluate” the Report to determine whether any children’s product containing phthalates should be banned under Section 8 of the Consumer Product Safety Act. If the CHAP report is non-responsive to making a finding under Section 8, I would understand that the CPSC should exercise independent judgement to act independent of the recommendations of the CHAP report, is this correct?
2. Mr. Chairman, I am concerned about some of the recommendations made in the CHAP report and the basis for the CHAP recommendations, at the hearing you seemed to indicate you intended to accept all of the conclusions of the CHAP report without independently evaluating the basis for the conclusions in the report, and considering your charge to make recommendations to ban consumer products under Section 8 of the Consumer Product Safety Act, can you please clarify yourself on this issue?

The Honorable Brett Guthrie

1. Mr. Chairman, I was pleased to hear of your commitment to evaluate the most recent data available on phthalate exposure and to provide the public with the ability to comment on any subsequent evaluation. I believe that it is critical to ensure that any evaluation of phthalate safety does not include as part of the evaluation phthalate exposure levels that include phthalates that were banned by the Consumer Product Safety Improvement Act.

Would you please provide me specific information related to the process you intend to follow regarding allowing public review and comment on any subsequent evaluation of phthalate exposure?

The Honorable Markwayne Mullin

In a statement provided to WISH TV for their November 13, 2014, story titled “Could small change stop gas can explosions? (<http://wishtv.com/2014/11/13/could-small-change-stop-gas-can-explosions/>)”, we understand that the CPSC’s Communications Director provided the following statement:

“If a consumer was to see a gas can at retail that contained a flame arrestor system, we would encourage them to select such a model, as it provides a vital layer of fire protection.”

1. Please provide a copy of the statement and all drafts thereof, and all records relating to the statement.
2. Who approved this statement?
3. What information, studies, or other relevant scientific research or testing data was relied upon by the CPSC to conclude that consumers should purchase a model containing “a flame arrestor system”?
4. Is the CPSC aware of any testing or research in which a consumer or industrial gas can purporting to contain a “flame arrestor system,” failed to prevent an internal combustion in the can?
5. Please provide the exact description (make and model) of portable consumer gas can that fit the description of the statement provided to WISH TV?
6. Please provide all testing data relating to those portable consumer gas cans identified in response to question 5 that prove that the “flame arrestor” system is both safe and effective.

7. In its statement to NBC News Regarding Gas Can Safety, the CPSC noted that “all portable gas cans must include a child resistant cap” and “to meet EPA and California carbon emissions rules, gas cans must also be sealed automatically.” Do the portable consumer gas cans identified in response to question 5 comply with these rules?
8. Please provide all documents and information, including drafts and emails, referring or relating to the “Statement From the U.S. Consumer Product Safety Commission For NBC News Regarding Gas Can Safety.”
9. Please provide all documents and information, including drafts and emails, referring or relating to the December 4, 2013, NBC News article, entitled “Consumer panel calls for flame arresters on gas cans after NBC report.”
10. Given that the CPSC believe that flame arrestor systems should be included in portable consumer fuel container, please explain why the CPSC has not undertaken to promulgate a consumer safety rule mandating the inclusion of such technology in gas cans?
11. If fuel containers are offered for sale at retail to consumers, must they comply with the Children’s Gasoline Burn Prevention Act? If fuel containers are sold at retail and are not in compliance with the CBPA or other federal consumer standard, what tools are available to the CPSC to address that issue?

The Honorable Jan Schakowsky

1. The Consumer Product Safety Commission has issued a proposed rule to establish safety standards for Recreational Off-Highway vehicles (ROV). This proposed rule came in reaction to 335 ROV-related deaths and 506 ROV-related injuries that occurred between 2003 and 2013.
 - a. Given that the Commission has been collecting information about ROV-related deaths and injuries since at least 2003, please explain why it has taken the Commission so long to propose safety standards?
 - b. Are you confident that you now have the research and information you need to promulgate an informed rule?
 - c. Do you have a sense of when the safety standards in the rule would become effective if the ROV In-Depth Examination Act, H.R. 999, became law?
2. The ROV In-Depth Examination Act, H.R. 999, would require the Commission to pay for a National Academy of Sciences study of the proposed ROV rule including requirements like having safe handling and a hangtag with safety information at the time of purchase. National Academy of Sciences studies can take a long time and it is not unusual for such a study to cost about a million dollars.
 - a. How expensive do you believe this study will be for the Commission?
 - b. Where would the funds to pay for it come from?
3. The ROV In-Depth Examination Act requires the National Academy of Sciences to study (1) the technical validity of the lateral stability and vehicle handling requirements for purposes of reducing the risk of ROV rollovers in the off-road environment, including the repeatability and reproducibility of testing for compliance with such requirements; (2) the number of ROV rollovers that would be prevented if the proposed requirements were adopted; and (3) whether there is a technical basis for the proposal to provide information on a point-of-sale hangtag about a vehicle’s rollover resistance on a progressive scale. Have you or will you complete these three

items prior to issuing a final rule, and do you have the technical and engineering expertise available to complete these reviews?

4. The ROV In-Depth Examination Act also requires the National Academy of Sciences to evaluate the effect that the rule will have on the Armed Services. The Consumer Product Safety Act – the authority under which the Commission is proposing to regulate ROVs – gives the Commission the authority to regulate “consumer products.” The Act defines consumer products as an article produced or distributed for sale to a consumer or for personal use, consumption or enjoyment of a consumer.
 - a. Do you agree that the Commission does not have the authority to set safety standards for the production of military equipment since it is not meant for consumers?
 - b. If the Commission does not have that authority, do you agree that the rule does not reach regulating equipment produced for military use?
5. Some have argued that a mandatory rule on ROVs is unnecessary because voluntary standards developed by the industry groups are adequate. Some have also argued that ROV injuries and deaths are the result of operator error and not the design of the vehicle. Others suggest responsibility for the deaths and injuries among children lies with consumers because ROVs should only be driven by those 16 or older.
 - a. Why are the standards in the proposed rule necessary when there are these voluntary standards? In other words, what is missing in the voluntary standards that is necessary to protect consumers, reduce injuries and deaths, and ensure compliance?
 - b. If deaths and injuries result only from operator error, I assume CPSC would focus its resources on consumer education. Do you agree that all steering, handling, and rollover problems cannot be attributed solely to operator error? What ROV vehicle design issues have led to injuries and deaths?
 - c. While some have suggested that drivers of ROVs should be over 15 years old, no one has suggested that passengers in ROVs should be over 15. Is it foreseeable that someone under 16 could drive an ROV? Is it foreseeable that someone under 16 is a passenger in an ROV?
 - d. At the hearing, you said that there are about 80 deaths a year attributed to ROV accidents and many more injuries. How many of those are children?
6. In a discussion of the Yamaha Rhino during the second panel of the hearing, one individual suggested that those vehicles were not defective. In the Notice of Proposed Rulemaking on ROV safety standards, there was a discussion of CPSC’s investigation of ROVs in the wake of reports of injuries and deaths associated with the Yamaha Rhino and the Rhino Repair Program through which the manufacturer agreed to make design changes to address stability and handling issues with the Rhino vehicles. Please discuss why CPSC found that the original design of the Rhino was not safe.
7. CPSC rulemaking, first initiated in 2006, on All-Terrain Vehicles (ATVs) titled “Standards for All Terrain Vehicles and Ban of Three-wheeled All-Terrain Vehicles,” which proposed important safety requirements for ATVs, has yet to be finalized, despite congressional direction to do so in the Consumer Product Safety Improvement Act (CPSIA) in 2008. Three years later, in 2011, Congress revisited its direction to the Commission, and passed a law requiring that the 2006 rulemaking be completed within one year.

Now here we are in 2015 and this rulemaking—which began in 2006, was directed to be completed by Congress on two occasions, finally with a 2012 deadline—has yet to be finalized. Meanwhile, in 2012 and 2013 alone, there were 939 deaths related to the use of ATVs.

- a. Are you committed to finalizing the 2006 ATV rulemaking and, if so, when can we expect a final rule to be issued?
 - b. What, if anything, does the Commission need from Congress to speed up this process?
8. As you are aware, the Chronic Hazard Advisory Panel (CHAP) released their final report on phthalates in July of last year, confirming that uses of these chemicals in children's toys and child-care articles pose serious risks.
- a. What are some of the health risks the CHAP identified from phthalate exposures?
 - b. What is CPSC doing to address phthalate exposures from children's toys and child care articles?
 - c. The CHAP found that phthalate exposures from foods, food packaging and drugs constituted some of the highest exposures across all subpopulations, and recommended that these sources be further assessed for risks to human health. How is CPSC coordinating with FDA to address those risks?
9. In October 2014, the Commission took an important step toward issuing a mandatory window coverings standard by voting unanimously to grant a petition for rulemaking. As you know, voluntary standards have not been effective in eliminating the strangulation and asphyxiation risk that cords from window blinds pose to infants and children.
- a. What is the next step for the Commission in developing a mandatory standard for window coverings and when do you expect to have it completed?
 - b. Why did voluntary standards fail to remedy the problem in the case of window coverings?
 - c. To what degree, if at all, does the experience with this product affect the Commission's stated intention of making voluntary standards a top priority?
 - d. It is estimated that these accidents could be prevented for less than \$1 per window covering. Do you believe that this somehow represents an onerous requirement on manufacturers?
10. The current process by which the trading community submits information to the federal government is fragmented and inefficient, with required trade-related data being sent to multiple agencies multiple times through processes that are largely paper-based and manual.

In the budget proposal you ask for no additional funds for import surveillance in FY 2016, but you recommend Congress adopt a user fee to pay for the Risk Assessment Methodology (RAM) targeting system.

- a. How does the RAM targeting system work and how can it save the Commission time and money once fully implemented? What other agencies currently use the same system?

- b. How will the “Single Window,” as required by the President’s Executive Order, be beneficial to traders and participating government agencies? What is the Commission’s progress in implementing this system?
 - c. According to CPSC staff, 28,000 examinations of imported products suspected of violations took place in 2014. Out of that number, 2,000 actual violations were discovered. Do you expect the fully-implemented RAM system to improve the rate of success in examining products suspected to be noncompliant?
11. Back in 2011, the Commission voted unanimously to begin a rulemaking to address the horrendous injuries that occur on table saws every year. According to the CPSC’s own statistics, there are over 60,000 of these injuries every year in the U.S., including approximately 10 amputations every day. Each amputation costs \$35,000 in health care costs and a lifetime of pain. I understand there is already technology on the market that would virtually eliminate these injuries.
- a. Is the Commission looking into the possibility of issuing a safety standard for table saws?
 - b. When do you expect that a proposed table saw safety standard will be published?
12. Recalled products pose a risk to consumers for months, even years, after they are taken off the market. Last year, several news investigations showed that recalled products may still find a market online through websites such as Craigslist. In these cases, the seller of a product may not be aware that a recall has been issued, placing the potential buyer at risk.
- a. Are online platforms for commerce are doing enough to keep recalled products off their sites?
 - b. What would you recommend these websites do to better inform consumers that they might be purchasing a dangerous product?
 - c. How can recalls be more effective in general? How can consumers be reached more effectively?
13. The Commission has been actively engaged in preventing tip-over incidents involving televisions, furniture, and appliances. The “Anchor It” campaign, launched in 2011, involved a data-driven study, a social media effort, and, most recently, a video that demonstrated how consumers can take simple steps to prevent a tip-over incident.
- a. Has this campaign been successful in achieving its goals?
 - b. What more can be done on consumer education campaigns such as “Anchor It?”

