



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

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

Tel: 301-987-2225
Fax: 301-504-0533
Email: cpaul@cpsc.gov

March 11, 2016

Mr. Thomas S. Yager
Vice President
Recreational Off-Highway Vehicle Association
2 Jenner Street, Suite 150
Irvine, CA 92618-3806

Dear Mr. Yager:

On February 11, 2015, U.S. Consumer Product Safety Commission (“CPSC”) staff received the Recirculation Ballot of the proposed American National Standard for Recreational Off-Highway Vehicles, ANSI/ROHVA 1-201X dated February 10, 2016.¹ Staff appreciates the opportunity to comment on the canvass draft and is very pleased to see ROHVA taking significant steps to improve the voluntary standard with the addition of requirements in the areas of lateral stability, vehicle handling, and occupant protection. CPSC staff supports the proposed changes to the voluntary standard contained in the recirculation ballot and believes the aggregate effect of improved vehicle stability, handling, and occupant protection will reduce injuries and deaths associated with ROV rollovers.

In a letter dated December 1, 2015, CPSC staff commented on Canvass Draft November 2, 2015, American National Standard for Recreational Off-Highway Vehicles, ANSI/ROHVA 1-201X. In response, ROHVA has stated a commitment to work with CPSC staff toward developing more specific hang tag requirements; and ROHVA has modified the voluntary standard to clarify tilt table test procedures and to include emergency locking retractor requirements for seat belts.²

¹ The comments in this letter are those of the CPSC staff and have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

² Letter from Tom Yager, ROHVA, to Caroleene Paul, CPSC, dated February 8, 2016. Retrieved from <http://www.cpsc.gov/Global/Regulations-Laws-and-Standards/Voluntary-Standards/ROHVA/ROHVAletterCPSCresponsetostaffcomments.pdf>.

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Thank you for this opportunity to comment. CPSC staff looks forward to continued cooperation with ROHVA regarding the ANSI/ROHVA 1-201X standard. If you have any questions or comments, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Caroleene Paul". The signature is written in a cursive style with a large, looped initial "C".

Caroleene Paul

cc: Patricia Edwards, CPSC Voluntary Standards Coordinator