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Mr. Todd Stevenson Director, Office of the Secretary U.S. Consumer Product Safety Commission 4330 East-West Highway Bethesda, MD 20814

Re: Consumer Focus Groups

Dear Mr. Stevenson:

I am writing in response to the Commission's request for input regarding the use of consumer focus groups as a method for gaining consumer insight into recall effectiveness and other product safety issues.

In the social sciences, there are a variety of techniques for understanding human behavior. In some cases, we are able to directly measure behavior (e.g., through observational research, experimental studies, and by studying incident data). To learn about consumer perceptions, attitudes, and motivation, we must rely on other techniques, as these dimensions cannot be measured directly.

Focus groups are useful for gathering consumer reactions to prototype products, procedures, and communication materials (e.g., advertising, instructions and warning labels). One of the greatest advantages of focus group research over other methods of data-gathering, such as questionnaires or interviews, is the potential for more comprehensive information to be generated as a result of the interaction between participants. Further, a well-trained moderator can assist participants in pursuing certain topics with greater depth than can be done in a questionnaire. Additionally, there is the opportunity for "branching" or exploration of pertinent, related topics that may arise in the discussion.

FREEDOM OF INFORMATION

Although focus groups do not provide projectable data, the research findings are useful for assessing the strengths and weaknesses of a procedure, product, or consumer communication (e.g., warnings, instructions) and for gaining insight into the perceptions, habits, and anticipated reactions of consumers. In the study of recall effectiveness, focus groups would be useful for gauging consumer reactions and potential acceptance of contemplated strategies, as well as for suggesting modifications that might increase consumer compliance.

The CPSC has used focus groups quite successfully in the past. For example, when I worked in the Division of Human Factors, we used a combination approach which included focus groups for studying parents' perceptions of toy suitability for young children. In these groups, we presented the children with toys and observed their play patterns. Additionally, parents participated in focus groups that explored topics such as: their children's interests in different types of toys, and their children's capabilities in using toy features. Feedback from these groups was very helpful and informed Staff's age determinations.

The CPSC also used focus groups to obtain consumer opinions about drowning warning labels for industrial-sized buckets. Four focus groups were conducted, including one consisting entirely of consumers whose primary household language was Spanish. Participants were encouraged to discuss their attitudes and provide candid and honest opinions on the topics raised by the moderator. The feedback from these focus groups was published (Pollack-Nelson, 1994) and served as the basis for the drowning warning label used on 5-gallon buckets today.

In sum, I advocate the use of focus groups as a method for gaining insight into consumer opinions about recall effectiveness and other product safety-related topics. Provided that the results are interpreted appropriately, the results of such research can be quite valuable in guiding and facilitating the Commission's communications with consumers.

I am available to further discuss the contents of this letter, at your convenience.

Best regards,

Carol Pollack-Nelson, Ph.D.

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