

March 15, 2007

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

RE: Consumer Focus Groups

Dear Mr. Stevenson:

On behalf of Safe Kids USA, a member of Safe Kids Worldwide (hereinafter "Safe Kids"), I am writing in response to a request for comments, published in the January 18, 2007 issue of the *Federal Register*, for the U.S. Consumer Product Safety Commission's (CPSC) proposed Consumer Focus Groups. Safe Kids is in full support of the CPSC's plans to conduct these focus groups, and has a few suggestions to improve its utility.

First, Safe Kids believes that these focus groups can be very helpful for the CPSC as it will provide direct feedback from consumers themselves about issues related to product use and safety. This information can inform the Commission's plans in the areas of public education, recall effectiveness, product research and voluntary standards development. We hope that the CPSC includes a special emphasis on children's products for at least one of its Consumer Focus Groups. Children's products pose a particular hazard due to vulnerability of the affected population, and we hope that the CPSC involves parents/caregivers and/or older children as needed in the focus groups. Their perspectives on how children's products are actually used in daily life could be beneficial for the CPSC's future safety initiatives.

Safe Kids also suggests that the Consumer Focus Groups be open to the public if at all possible. Organizations, like Safe Kids, may be able to glean valuable information simply by observing the focus group in action. In turn, this could help us with our own public education efforts. In the alternative, we suggest that any reports resulting from the Consumer Focus Groups be made available to the public.

Overall, Safe Kids is very supportive of the CPSC's efforts to convene a series of Consumer Focus Groups. I am available to answer any questions that the CPSC might have relating to our comments. As always, Safe Kids looks forward to working with the CPSC on this and other issues in the future.

Sincerely,

Alan Korn, J.D.

Director of Public Policy & General Counsel