



**OUTDOOR POWER EQUIPMENT
INSTITUTE**

January 23, 2016

TO: Office of the Secretary
Consumer Product Safety Commission
Room 820
4330 East West Highway
Bethesda, MD 20814

ATTN: CPSC Docket No. CPSC-2012-0058 (Agency Information Collection Activities; Proposed Collection; Comment Request; Safety Standard for Walk-Behind Power Lawn Mowers)

The Outdoor Power Equipment Institute (“OPEI”) appreciates the opportunity to provide the following comments in response to the Consumer Product Safety Commission’s (“CPSC” or “Commission”) November 25, 2015 request for public comments regarding the Agency Information Collection Activities; Proposed Collection; Comment Request; Safety Standard for Walk-Behind Power Lawn Mowers.¹ OPEI is an international trade association representing over 100 manufacturers and their suppliers of small engines, utility vehicles, and consumer and commercial outdoor power equipment and is committed to all aspects of consumer safety, including standards development.

As a recognized Standards Development Organization for the American National Standards Institute (“ANSI”), and the U.S. association representing manufacturers of walk-behind power lawn mowers, OPEI maintains *OPEI/ANSI B71.1 – American National Standard for Consumer Turf Care Equipment – Pedestrian-Controlled Mowers and Ride-On Mowers – Safety Specifications*. Additionally, this voluntary standard includes as an annex the subject CPSC requirements which are an integral component of complying with the ANSI standard. As such, please consider the comments specific to the questions posed in the subject request.

Question II. Whether the estimated burden of the proposed collection of information is accurate.

OPEI believes that the estimated burden is underestimated as it is likely based on an outdated estimate of the U.S. market. According to OPEI data, accounting for 8 member manufacturers, 4.7 million walk-behind (gas) power lawn mowers were shipped in the U.S. during 2015.

OPEI has no comments on the additional three questions posed in the request, but we appreciate the opportunity to review this request and provide a response. Please contact me if we can provide additional information or answer any follow-up questions.

Respectfully submitted,

Daniel J. Mustico
Vice President, Government & Market Affairs

¹ 80 Fed. Reg. 73735-73736 (Nov. 25, 2015).