



DEPARTMENTS OF THE ARMY AND AIR FORCE
Headquarters Army & Air Force Exchange Service
Dallas, Texas 75266-0202



SEP 7 2007

Honorable Bobby L. Rush
Chairman
Subcommittee on Commerce, Trade, and Consumer Relations
Committee on Energy and Commerce
2125 Rayburn House Office Building
Washington D.C. 20515

Dear Mr. Chairman:

Thank you for your August 22, 2007 letter regarding children's products containing lead which exceeds lawful safety standards. We have provided an information paper containing the requested information.

Thank you for allowing us the opportunity to provide this information. If you require any additional information, please contact our Vice President of Corporate Plans and Communication, Ken Moon at (214) 312-6196.

Sincerely,


KEITH L. THURGOOD
BG, USA
Commander

1 Encl

COMMITTEE ON ENERGY AND COMMERCE QUESTIONS

1. In addition to the approximately 3000 Invincibles Transport Converters Toy sets recalled by the CPSC in May, please provide detailed information on any toys or other products imported by your company with lead paint or lead content that exceeds lawful safety standards.

On 18 July we, in conjunction with CPSC recalled an additional 5 Soldier Bear styles from the same manufacturer, Toy Century. We tested all of Toy Century's remaining styles with surface paints.

The 5 recalled styles are as follows:

1. Heroes- Dino Mega Cruiser
2. Dinosaur Adventure Set
3. Wild Animal Adventure Set (1 of 2 assortments)
Dinosaur Adventure Set (2 of 2 assortments)
4. Heroes Vehicle Play Set (3 assortments: Military, Police and Fire Rescue)

2. Please provide information detailing the level of lead in the recalled toys and children's products if available. Allowable limit for lead content as per 16 CFR is: 0.06%. The following table contains the percent of lead found in individual paint colors of action figures contained in the Invincibles Transport Converters Toy sets.

Sample	Description	Total Lead % Pb (wt/wt)
07-302-0151	orange hair	8.42
07-302-0151	red bandana	3.92
07-302-0151	brown boot	2.44

3. Please provide the name and location of the company and facility in China that manufactured the Invincibles Transport Converters Toy sets?

TOY CENTURY INDUSTRIAL CO., LIMITED
UNIT 1010-1015 10/F TOWER B. NEW MANDARIN PLAZA
NO 14 SCIENCE MUSEUM ROAD
TSIM SHA TSUK EAST, KOWLOON, HONG KONG

4. Are there provisions in you agreements with the Chinese or other manufacturers banning the use of lead and lead paint or limiting its use to lawful safety standards in the manufacture of products your company imports? Yes, suppliers are required to meet applicable government regulations and recognizable industry Standards for toys (16 CFR Part 1303 applies).

5. What steps does your company take to test and inspect imported toys or other children's products before they are sent to retail outlets in the United States to ensure compliance with lead level safety standards? QA tests Private Label toys for safety and performance in our stateside QA lab. Toxicity testing for lead and heavy metals is accomplished by reviewing independent lab reports for specific supplier submitted samples to make sure toys are in compliance with federal guidelines and allowable levels are not exceeded.

6. How and when did your company discover the lead paint on the imported Invincibles Transport Converters Toy sets that lead to the announcement by the CPSC on May 23, 2007? When did you first contact CPSC about the Invincibles Transport Converters Toy sets? Based on earlier CPSC recalls of similar Toy Century products, AAFES initiated additional testing through an independent laboratory. We received lab reports stating the Invincibles Transport Converters Toy sets contained excess levels of lead on 3 April 2007. We reported our findings to CPSC on the same day, 3 April 2007. **Note: Toys were on QA hold throughout the entire testing process from 14 March onward.**

7. Please provide details of the recall action undertaken by your company including steps to inform retailers and consumers of the recall because of the lead hazard posed by the Invincibles Transport Converters Toy sets. Do you provide information in the language other than English? Did you take any specific steps to provide information to your retail partners located in underserved communities?

1. All products were put on QA Hold once testing was initiated.
2. Recall messages were sent to all of our stores and distribution centers.
3. Customer level messages were posted in our customer service areas.
4. Recall posters were posted in the toy departments.
5. AAFES sent press releases to newspapers, magazines and websites
6. A toll free recall number was established (1-800-866-3605)
7. The recall was posted on our website (www.aafes.com)

We currently do not provide translated versions of the recall.

All of our stores are notified of the recall via email

8. Please provide details on the consumer response to the recall since the recall announcement. Including how many Invincibles Transport Converters Toy sets were returned for a refund.

480 Transport Converters Toy sets were recovered at store level

74 Customers contacted our toll free number.