REDEMPTION, PARTY, FUNDRAISING,
AMUSEMENT PARK, NOVELTY TOYS
5 Industrial Road, Cumberland RI 02864
t (401) 335-3300 f (401) 335-3311
www.rinovelty.com
1-800-528-5599

September 6, 2007

Mr. Bobby L. Rush, Chairman
Mr. Cliff Stearns, Ranking Member
Subcommittee on Commerce, Trade,
and Consumer Protection
2125 Rayburn House Office Bldg
Washington, DC 20515

Dear Congressman Rush and Congressman Stearns:

The following will respond to the questions in your letter of August 22, 2007 to Rhode Island Novelty ("RIN"). By way of background, RIN distributes approximately 7500 novelty items and until 2006 had not experienced any difficulties involving the lead content of those items.

Question 1
RIN has experienced a recall on one additional item due to concerns of excessive lead content. The product involved was a pendant attached to a chain and a small clasp. The pendant and chain were tested and determined to be safe. The small clasp on the chain was determined to involve a lead content that exceeded allowable standards. The distribution of this item was extremely limited (approximately 71 dz.).

Question 2
With respect to the children's necklaces referenced in your letter, one sample tested had a Total Lead Extract of 196.0 ug and a second sample tested had a Total Lead Extract of 5,119.99 ug. Two samples tested of the above referenced small chain clasp had a Total Lead Extract of 7,559.90 and 4,410.0 ug's respectively.

Question 3
Some of the children's necklaces in question were purchased from Ningbo B&B International Trading Co., 21# Hualouxiang, Ningbo, China 315010. Other of the children's necklaces in question were purchased from Superior Traders International, 415 Sec 4 Shinyi Rd., Taipei, Taiwan.

Question 4
In the event that Rhode Island Novelty has any concerns with respect to lawful safety standards involving lead, the company takes precautions to obtain test results prior to importation. All vendors are expected to ship goods that comply with those results. Rhode Island Novelty obtained test results from its initial supplier of certain children's necklaces that showed the merchandise complied with U.S. safety standards. Thereafter,

the company sourced the goods from an alternative supplier, but inadvertently did not obtain the test results from that second vendor.

Question 5
In the event of a concern about lead content or lead paint in a product, then RIN requests test results on all affected components from the supplier prior to import.

Question 6
Rhode Island Novelty became aware of the potential for excess lead in certain of the children's necklaces as a result of CPSC correspondence on or about November 22, 2006. After receiving that correspondence, the company became aware of a potential excess lead issue on similar necklaces and sent those necklaces to an independent laboratory for testing. Upon learning of the test results on those additional necklaces in February 2007, RIN contacted the CPSC within a matter of days.

Question 7
Upon learning of the potential for excess lead in the affected necklaces RIN stopped marketing those goods. Additionally, the company fully cooperated with the CPSC in the recall effort, issued a joint press release with the CPSC and notified the CPSC as to the names of affected consumers and retailers. RIN also sent letters to affected consumers and retailers and has posted information concerning the recall prominently on the RIN website. Since the RIN website is only in English and the company normally only takes orders in English, the recall information is only communicated in English.

Question 8
A number of consumers have contacted RIN as a result of the website information and/or recall publicity. However, the company does not keep records on how many consumers have contacted the company due to this issue or how many units each consumer purchased. Upon receiving an inquiry, the company advises consumers to destroy and properly dispose of the necklaces, and thereafter issues the consumer a full credit for the units in question.

As a responsible importer and distributor, RIN appreciates your efforts and shares your Subcommittee's concern that imported goods should not pose a health risk to consumers.

Sincerely,
Rhode Island Novelty

James G. Connor