

August 31, 2007

The Honorable Bobby L. Rush  
The Honorable Cliff Stearns  
U.S. House of Representatives  
Committee on Energy and Commerce  
Subcommittee on Commerce, Trade and Consumer Protection  
2125 Rayburn House Office Building  
Washington, DC 20515-6115

Mailed and sent via fax 202-225-2525

Gentlemen:

We have received your letter dated August 22, 2007 regarding the recall conducted earlier this year for the Stuffed Fun Balls. In your letter you asked a number of questions, the answers to which are below:

1. In addition to the approximately 7,200 Stuffed Fun Balls recalled by the CPSC in March, please provide detailed information on any other toys or other products imported by your company with lead paint or lead content that exceeds lawful safety standards.

Response – none

2. Please provide information detailing the level of lead in the recalled toys and products, if available.

Response – We have three separate test results, one of which indicated a lead level of 77 mg/kg, one of which indicated a lead level of 2,740 mg/kg and one of which indicated a lead level of 14,000 mg/kg. The first test results were supplied by the manufacturer at time of import, the second were the results of a test initiated by the Empire State Consumer Association and the third were the results of a test done by Bureau Veritas, a testing company hired by Regent Products.

3. Please provide the name and location of the company and facility in China that manufactured the Stuffed Fun Balls.

Response – The trading company that we dealt with was Rainbow Brothers from Hong Kong. We do not know the name or location of the facility that manufactured the product.

4. Are there provisions in your agreements with the Chinese or other manufacturers banning the use of lead paint or limiting its use to lawful safety standards in the manufacture of the products your company imports?

Response – Our agreements do not reference the use of lead paint, but we do however require that all goods meet all lawful safety standards.

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?

Response – Upon receipt of the goods in our warehouse we inspect the goods to ensure that they match the production samples we previously received and we verify that we have the test results from the manufacturer or trading company about compliance with the applicable safety standards.

6. How and when did your company discover the lead paint on the imported Stuffed Fun Balls that led to the recall announcement by the CPSC on March 28, 2007? When did you first contact the CPSC about the Stuffed Fun Balls?

Response – We received a letter on December 26, 2006, dated December 21, 2006, from Ms. Emily Laubscher from the State of New York Consumer Frauds and Protection Bureau, who was reacting to a claim made by the Empire State Consumer Association. The letter lacked specifics and we responded by first suspending all sales and shipments of the product while at the same time asking Ms. Laubscher for more information about the specifics of the complaint. We also initiated our own testing by an independent agency. Upon receiving the results of the test, which varied dramatically from both the factory results and those of the Empire State Consumer Association, we notified CPSC on January 12, 2007 via their website.

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 Stuffed Fun Balls. Did you provide information in a language other than English? Did you take any specific steps to provide information to your retail partners located in underserved communities?

Response – On January 24, 2007, even before the CPSC contacted us back about our report, we mailed a letter to all retailers to whom we had sold the product. This letter indicated that the retailer was to immediately pull any and all product from their shelves, and that they were to post the recall posters that we included in their stores immediately. The retailers were directed to destroy the product at their location. These posters were prepared in accordance with the CPSC guidelines and indicated the consumer should return the product for a full refund. The retailers were given full credit for all of the product that they originally purchased. The letter and the safety recall poster were both prepared only in

English. After the CPSC responded to our report, we additionally established an email address and 800 number for consumers and cooperated with the CPSC in the announcement of the recall.

8. Please provide details on the consumer response to the recall since the recall announcement, including how many Stuffed Fun Balls have been returned for a refund.

Response – To date, we have received approximately 8 email inquiries and 29 phone calls from consumers about the recall. Most requested only clarification about the product involved, since they had not seen the poster (which included a picture of the product) and had only read of the recall. Since the retailer was directed to destroy the product locally, we have no information about the number of balls that were returned for a refund.

If you or the other Committee members need any further information or if there is any other way that we can assist the Committee please feel free to ask. I can be reached at 708-583-1000, ext 300 or at [rayb@regentproducts.com](mailto:rayb@regentproducts.com).

Sincerely,



Ray Batkiewicz  
Vice President  
Regent Products Corp.