

## Matrix Information Paper on Anti-tip Devices for Freestanding Ranges

### Background

- In the early 80's to reduce the cost of goods for freestanding ranges the industry began to use lighter gauges of steel in their products. This change and other material changes resulted in a significantly lighter weight product.
- Because the ranges were lighter in weight, opening the oven door and applying a weight on the open oven door would cause the range to tip forward. If the range was in use, this could present a consumer product safety issue. In fact, there were civil actions under manufacturer liability as a result of this type of accident.
- To address this liability issue, the industry established a weight standard and secured the agreement of all manufacturers to provide "anti-tip" devices with their product and to apply warning labels to their products, urging the installation of the anti-tip device. Industry direction to range sellers was to support the initiative by informing the customer of the potential danger and by providing a means for supplying installation. Sears has participated in this educational campaign.
- There is not a single, uniform device or approach to installation of anti-tip devices. Each manufacturer has multiple devices developed by various engineering efforts for their various styles and sizes of ranges. The most typical approach is to provide a device that mounts on the floor at the rear of the product that "traps" the rear leveling leg and holds it to the floor, thereby preventing a tip over.
- At the time these devices were first introduced, the Product Buyer for Ranges asked SLS to investigate if anti-tip devices could be installed by delivery personnel at the time of delivery. It was decided at that time that Sears Product Services was best qualified to provide the necessary services, because of 1) the many different types of devices raised driver training issues, 2) the time required to install would significantly increase time in home and therefore delivery expense, 3) delivery personnel would be required to carry electric drills and other additional tools, 4) different types of floor composition raised additional procedural and training issues and 5) additional liability coverage would be required to protect against installation errors and damage to customer property .
- Recently, this issue was re-surfaced by a different Product Buyer for Ranges, <sup>who</sup> wanted to be sure that we were still doing what was required for consumer safety and because she was being charged for some in-warranty service calls to satisfy some customers that interpreted the warning labels as a requirement and demanded that Sears fulfill the requirement.
- SLG has participated in meetings with Brand Central Product Buying, Sears Product Services, Sears Laboratory, and Sears Legal to discuss anti-tip devices. The

consensus of these meetings was that better anti-tip installation techniques were needed before installation upon delivery was feasible.

### **Ups**

- Anti-tip installation on time of delivery could be and additional customer service for those wishing installation.
- Anti-tip installation at time of delivery would limit liability risk.
- Anti-tip installation would be a point of differentiation.

### **Downs**

- Delivery time and expense would increase. (Unless we could sell the service.)
- Improper installation could increase liability. (Training could help reduce risk.)
- Significant training would be required to address different types of devices and methods to attach in different types of construction.

### **Key Points**

- Brand Central has not raised this issue as a business requirement.
- Customer demand for the installation is at a very low level.
- We are currently meeting the requirements of the industry.

### **Bottom Line**

- SLS needs to take no action to provide installation of anti-tip devices. SLG will continue to monitor Brand Central's requirements on this issue.