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August 16, 1999

Sears Roebuck
3333 Beverly Road
Hoffman Estates, IL. 60179
Attn: Mr. George Zelazny



Subject: Household Electric Range Stability

Dear George:

This letter will confirm our telephone conversation of July 28, 1999.

Through several phone conversations during the months of May and June, we discussed Sears obligation to install the anti-tip hardware that is provided with the electric ranges. The issuance of the Underwriters Laboratories Inc. (UL) Listing Mark for the electric ranges is premised on the expectation that the ranges provided with the anti-tip hardware will be installed per the installation instructions. The installation instructions require that the anti-tip hardware be installed. Sears must assume responsibility for installation of the anti-tip hardware upon which the UL Listing is based.

During our June 14th and July 28th telephone conversations, we discussed the feasibility of revising UL 858, the Standard for Household Electric Ranges to specify in the instruction manual that the anti-tip hardware be installed by the homeowner or a qualified contractor. Due to the importance of having the anti-tip hardware installed, and based upon the record to date, UL questions whether it is reasonable to rely on the homeowner to install this hardware after the electric range has been installed. We would be most interested in the position of other segments of the U.S. Safety System and, in particular, that of the U.S. Consumer Product Safety Commission (CPSC). For your reference, I've attached the most recent information available from the CPSC on range tipovers, including accidents and death certificates. A contrary view on the part of the CPSC would require UL to revisit the issue. However, failing that government interdiction, UL would expect that Sears and other distributors assume responsibility for the installation of this integral part of the safety system for household electric ranges.

Should you have any questions concerning the above, please contact me.

Regards,


Lenore Berman

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