

**CONSUMER PRODUCT REPORTS
PROCEDURE FOR COMPLYING WITH THE
CONSUMER PRODUCT SAFETY ACT**

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1. GENERAL

1.01 This section describes the responsibilities of The Pacific Company and Nevada Bell (PAC) in complying with the Consumer Product Safety Act (CPSA).

1.02 It is reissued to:

- Designate the District Staff Manager — Residence Installation and Maintenance (I&M) Support District as the Pacific Company. CPR Coordinator.
- Make minor revisions in the text.
- Update Charts A, B, and C.

Note: Marginal arrows used to indicate changes are omitted.

1.03 It outlines the procedures to follow when a consumer product complaint is received alleging the presence of an unreasonable risk of injury or hazard to the public.

1.04 The law states that as soon as a consumer product, including telephone accessories, is known to contain a defect which could create a substantial product hazard (from a chemical, acoustical, mechanical, or electrical point-of-view), the following actions must be initiated, as appropriate:

- (a) Formal notification must be made to the Consumer Product Safety Commission (CPSC).
- (b) Corrective action must be taken (ie, repair of the defective product or its removal and replacement by a nondefective product).

NOTICE

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- (c) Supply pipeline must be purged of any defective product on trucks, in garages, in storerooms, or elsewhere.
- (d) Defective product must be removed and retained for study and evaluation.

1.05 Because of the importance of removing a potential risk of injury related to any defective consumer product, the reporting intervals are exceedingly short and the civil/criminal penalties severe. For these reasons, situations brought to the telephone company's (TELCo's) attention should be reported and investigated in an expeditious manner.

1.06 The PAC objective is to complete the processing and forwarding of a CPR on the same day the product hazard is discovered, and in any event no later than the second working day following the discovery.

1.07 Any employee, who in his or her normal day-to-day activities comes into contact with customers, may be made aware of a substantial product hazard or a potential hazard. Such employees and their supervisors shall be informed of the requirement and procedures for reporting such product hazards to the appropriate line supervisor.



A customer contact is not necessary to initiate a report of a potential risk. Any situation or incident regarding such a product, with which an employee is familiar, should be reported as soon as its existence is apparent. It is extremely important that the consumer product report (CPR) is filed as soon as a potential risk becomes known.

2. PROCESSING CPRs

2.01 For CPRs related to products manufactured or supplied by Western Electric (WE), see Chart A.

2.02 For CPRs related to general trade products (GTPs) that the Bell System Purchased Products Division (BSPPD) has either evaluated and rated suitable or conditionally suitable in a Product Evaluation Report (PER) or has made available through a national contract, see Chart B.

2.03 For CPRs related to all other GTPs (other than those covered in 2.02) that PAC purchased directly from a supplier, see Chart C.

Note: Processing of information up to Residence Staff — Headquarters is the same for all three product categories.

Field Personnel

2.04 Field personnel must report to their supervisor immediately any condition that involves or potentially involves a substantial product hazard brought to their attention. This may be by telephone or face-to-face and must be done *no later* than the close of the same working day.

2.05 The supervisor, if other than the line supervisor, shall immediately report the condition to the line supervisor by telephone.

Line Supervisor Responsibilities

Note: The term line supervisor, as used in this section, refers to the supervisor directly responsible for maintenance of the product involved.

2.06 After confirming the validity of the reported product hazard, the line supervisor shall immediately report the product hazard by telephone to the local Security office. Security will assign a case number if appropriate.

2.07 The line supervisor shall immediately report the product hazard by telephone to the Maintenance Engineer. The report should contain all information required to complete the CPR. (See Exhibit 1.) The report should be made on the same day as the line supervisor learns of the product hazard, and in no event later than the next working day.

2.08 The line supervisor shall take whatever action may be necessary to eliminate the product hazard and, if possible, to preserve the defective product for study and evaluation. (See Part 3.)

2.09 The line supervisor will prepare or assist the Maintenance Engineer in the preparation of an Engineering Complaint (EC) on the defective product. (See 2.11 and 2.12.)

Maintenance Engineer

Note: The term Maintenance Engineer, as used in this section, refers to the organization, wherever located organizationally, responsible for maintenance engineering activities for customer premises equipment.

2.10 The Maintenance Engineer shall immediately report the product hazard to the District Staff Manager — Residence I&M Support (Residence Staff — Headquarters) who will prepare and distribute the CPR. This report should contain all information required to complete the CPR. (See Exhibit 1.) This report should be made on the same day as the Maintenance Engineer receives the report of the product hazard, and in no event later than the next working day. The Residence Staff contact telephone number is 415-954-9525.

2.11 The Maintenance Engineer will assign an EC number and ensure that an EC is prepared covering the defective product (see 2.09).

2.12 The EC should contain instructions to return the defective product, after laboratory evaluation is completed, to Security. Include return address information and the Security Case Number.

2.13 The Maintenance Engineer shall maintain a permanent record for each CPR. (See 3.10 and 3.11.)

District Staff Manager — Residence I&M Support (Residence Staff — Headquarters)

2.14 The CPR Coordinator in the Residence I&M Support District shall immediately report the product hazard by telephone to the Legal Department to determine, jointly, if a CPR is required. The Legal Department contact telephone number is 415-542-1243.

2.15 The CPR Coordinator will prepare the CPR, Form E 6543. (See Exhibit 1.)

2.16 The CPR Coordinator will distribute CPRs in accordance with Part 4 and Charts A, B and C.

2.17 The CPR Coordinator will assign CPR Numbers, maintain a CPR Log, and a file of CPRs.

Security

2.18 Security shall, upon receiving a report of a product hazard, assign a case number, if appropriate, and conduct such investigation as is deemed necessary.

2.19 Security will be the custodian for defective products after laboratory evaluation, until the applicable statute of limitations has expired.

Legal Department

2.20 The Legal Department will consult with the Maintenance Engineer, the District Staff Manager — Residence I&M Support, and others as appropriate to determine the need for preparation of a CPR.

2.21 The Legal Department will work with the Purchasing Director in making the necessary contacts with the general trade manufacturer/supplier and the required reports to the CPSC (see 2.22).

Purchasing Director

2.22 The Purchasing Director will receive the action copy of any CPR related to a GTP that PAC purchased directly from a supplier. (See Chart C.)

2.23 The Purchasing Director will work with the Legal Department in making the necessary contacts with the general trade manufacturer/supplier and the required reports to the CPSC.

3. HANDLING DEFECTIVE PRODUCTS

3.01 In the event that any product provided by PAC (includes products manufactured for WE under KS or AT specifications and products purchased from the General Trade) is alleged or suspected to have caused personal injury to a customer or member of the public or to have caused property damage, it is important that the equipment be recovered for laboratory evaluation and safekeeping, under the supervision of Security, until after the applicable statute of limitations has expired.

3.02 In order for the investigation of a suspected product defect or the analysis of a failure mode to be meaningful, the procedures contained in this part for inspection, recovery and safekeeping will be followed.

Inspection/Description

3.03 Initially and before removal from its installation, the suspect equipment should be

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carefully inspected visually and detailed notes made of its condition and appearance. The nature of the installation should also be briefly described. In the case of a plug-in device, for example, it should be recorded whether or not the device was plugged in to the jack or outlet at the time of the inspection. Photographs should be taken of the equipment involved, of the alleged damages sustained, and of any other suspicious elements that may have caused the damages in question. A floor plan sketch should be made, if necessary, to supplement photographs, or clarify the written description of the site.

3.04 Wherever possible, complete documentation should include a description of the events which took place and the time sequence in which they occurred. To the extent feasible, this information should be obtained in the form of statements from the individual allegedly injured or whose property was allegedly damaged, and from any others who were eyewitnesses.

Actual Removal

3.05 After the equipment is inspected, it should be tagged for identification and carefully removed for examination or laboratory evaluation. Appropriate precautions must be taken not to alter the condition of the product in the process of removal from the installation. The remains, even if consisting only of fragments, should be retrieved with extreme care. The person removing the equipment should sign a statement listing his/her name and the date of removal of the equipment. If the specimen is to be put in storage temporarily, it should be tagged for identification and stored in such a manner that its condition will not be altered and its continuous custody since removal from the installation is capable of being verified.

3.06 If requested, a new, undamaged, working specimen, identical with the suspect equipment being removed, shall be obtained and placed under the jurisdiction of Security for future testing if that should be necessary.

Custody Disputes

3.07 Depending on the circumstances involved, the following may seek to retain custody of the equipment:

- The customer

- The customer's landlord
- The customer's insurance adjuster
- The customer's attorney
- The fire marshal
- The manufacturer
- Others

3.08 Security should be consulted if a custody question arises.

3.09 Security may consult with the Legal Department in resolving such custody disputes.

Identification/Record

3.10 Each piece of equipment removed from the installation should be identified by a securely affixed tag bearing a serial number or other description and the Security Case Number. Shards or fragments should be bagged and an identifying tag attached to the bag. A record book, log or other bound file should be kept, containing the serial number or other identification information, and installation, maintenance and removal data. Positive identification is essential so that, in the investigation of a failure, the condition of a particular unit can be related to the history of its specific installation. The name of the person making the actual removal and date of removal should be recorded in the record book or log.

3.11 The record book or log should also contain all pertinent information regarding the incident (even though such information is recorded on the CPR and/or EC), including entries required to maintain the chain of custody. (See 3.16.)

Packaging

3.12 No matter how badly damaged a piece of equipment may be, it should be packed with care for shipment, so that when it is received at the laboratory for examination it will, to the extent possible, be in the same condition as it was before removal from the installation. Shipping damage could result in erroneous conclusions as to the nature of the failure mode.

Shipping

3.13 Shipping instructions will be issued on a case-by-case basis, depending on circumstances. In most instances, the Bell Laboratories Field Representative will provide instructions regarding shipping location. The District Staff Manager-Residence I&M Support will provide shipping instructions for PAC GTPs. (See 2.03.)

3.14 Copies of the CPR and the Engineering Complaint should be included in the package with the defective product shipped to the laboratory for examination.

3.15 Shipment of defective products within the Company or to a laboratory for examination should be by registered mail with return receipt requested to preserve the chain of custody.

Chain of Custody

3.16 It is important that a chain of custody of the equipment be established, beginning with its removal from the installation and continuing until final disposition. Therefore, each person handling or retaining the equipment should make certain that their name and the date involved is recorded. (See 3.11.)

Storage

3.17 After evaluation, the equipment should be returned from the laboratory to Security, with a report describing the results of the evaluation. The equipment and the report should be retained in a secure place until needed for pretrial, trial or other purposes or until expiration of the statute of limitations. Once the product is in PACs hands for safekeeping, it must be protected against damage and stored in a secure locked cabinet or drawer. It is important that it be segregated from other equipment so that it will not be handled indiscriminately or misplaced. It should not be accessible to unauthorized persons. In the event that it is removed by a lawyer working on the case, it should be logged out to the lawyer involved.

Final Disposition

3.18 After the expiration of the statute of limitations (usually 1 year), and with the approval of the Legal Department and Security, the equipment may be returned to Western Electric

(WE), returned to the outside manufacturer, repaired, modified, junked, or disposed of in some other appropriate manner. In no instance, however, should disposition be undertaken except in accordance with instructions from the Legal Department and Security.

4. DISTRIBUTION OF CPRs (Form E 6543)

4.01 The District Staff Manager-Residence I&M Support will arrange for copies of the CPR to be distributed in accordance with the procedures outlined in 4.02 through 4.05.

4.02 CPRs related to WE manufactured and/or supplied customer products (refer to Chart A):

Normal Distribution

- Consumer Product Safety Coordinator*
Western Electric
222 Broadway
New York, NY 10038
- Environmental Health and Safety
Department
Bell Telephone Laboratories
600 Mountain Avenue
Murray Hill, NJ 07974
- AT&T
Director,
Residence Installation, Maintenance and
Engineering
Attn: Consumer Product Safety Coordinator
295 No. Maple Avenue, Room 2148 H2
Basking Ridge, NJ 07920
- Field Representative
Bell Telephone Laboratories
116 New Montgomery Street, Room 601
San Francisco, CA 94105

Note: Send a copy to one of following, as appropriate, locations (depends on location of defective product):

- WE Quality Service Engineer
Department 80010
898 Stewart Drive
Sunnyvale, CA 94086

*Action Addressee

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- WE Quality Service Engineer
2700 Watt Avenue, Room 3200
Sacramento, CA 95821
- WE Quality Service Engineer
177 E. Colorado Boulevard, Room 596
Pasadena, CA 91101
- WE Quality Service Engineer
525 "B" Street, Room 1223
San Diego, CA 92101

Expedited Advance Copy (ADNET or Facsimile)

- AT&T
Director,
Residence Installation, Maintenance and
Engineering
Attn: Consumer Product Safety Coordinator
Telecopier Number: 201+221-3681
- Western Electric Co.
Consumer Product Safety Coordinator
Telecopier Number: 212+571-2885
ADNET Code: WECI

4.03 CPRs related to BSPPD general trade customer products (refer to Chart B):

Normal Distribution

- AT&T
Director,*
Residence Installation, Maintenance and
Engineering
Attn: Consumer Product Safety Coordinator
295 No. Maple Avenue, Room 2148 H2
Basking Ridge, NJ 07920
- Purchasing Director
Materials Management
140 New Montgomery Street, Room 226
San Francisco, CA 94105

Expedited Advance Copy (ADNET or Facsimile)

- AT&T
Director,
Residence Installation, Maintenance and
Engineering
Attn: Consumer Product Safety Coordinator
Telecopier Number: 201+221-3681

4.04 CPRs related to PAC general trade customer products (refer to Chart C):

Normal Distribution

- Purchasing Director*
Materials Management
140 New Montgomery Street, Room 226
San Francisco, CA 94105
- AT&T
Director,
Residence Installation, Maintenance and
Engineering
Attn: Consumer Product Safety Coordinator
295 No. Maple Avenue, Room 2148 H2
Basking Ridge, NJ 07920

Expedited Advance Copy (ADNET or Hand Deliver)

- Purchasing Director, Materials Management
Hand Deliver to 140 New Montgomery
Street, Room 226, San Francisco, CA

4.05 All CPRs (refer to Charts A, B, and C):

Normal Distribution

- District Security Manager
116 New Montgomery Street, Room 711
San Francisco, CA 94105
- Attorney
CPR
140 New Montgomery Street, Room 1610
San Francisco, CA 94105

As Appropriate Distribution

- District Staff Engineer
Business Premises Engineer/Switching
- District Staff Engineer
Business Premises Engineer/Nonswitching
- District Staff Manager
Methods & Operations
(Public Services)
- District Staff Manager
OSP Construction

*Action Addressee

CHART A

WE MANUFACTURED AND/OR SUPPLIED
CONSUMER PRODUCT REPORTING (CPR) E-6543

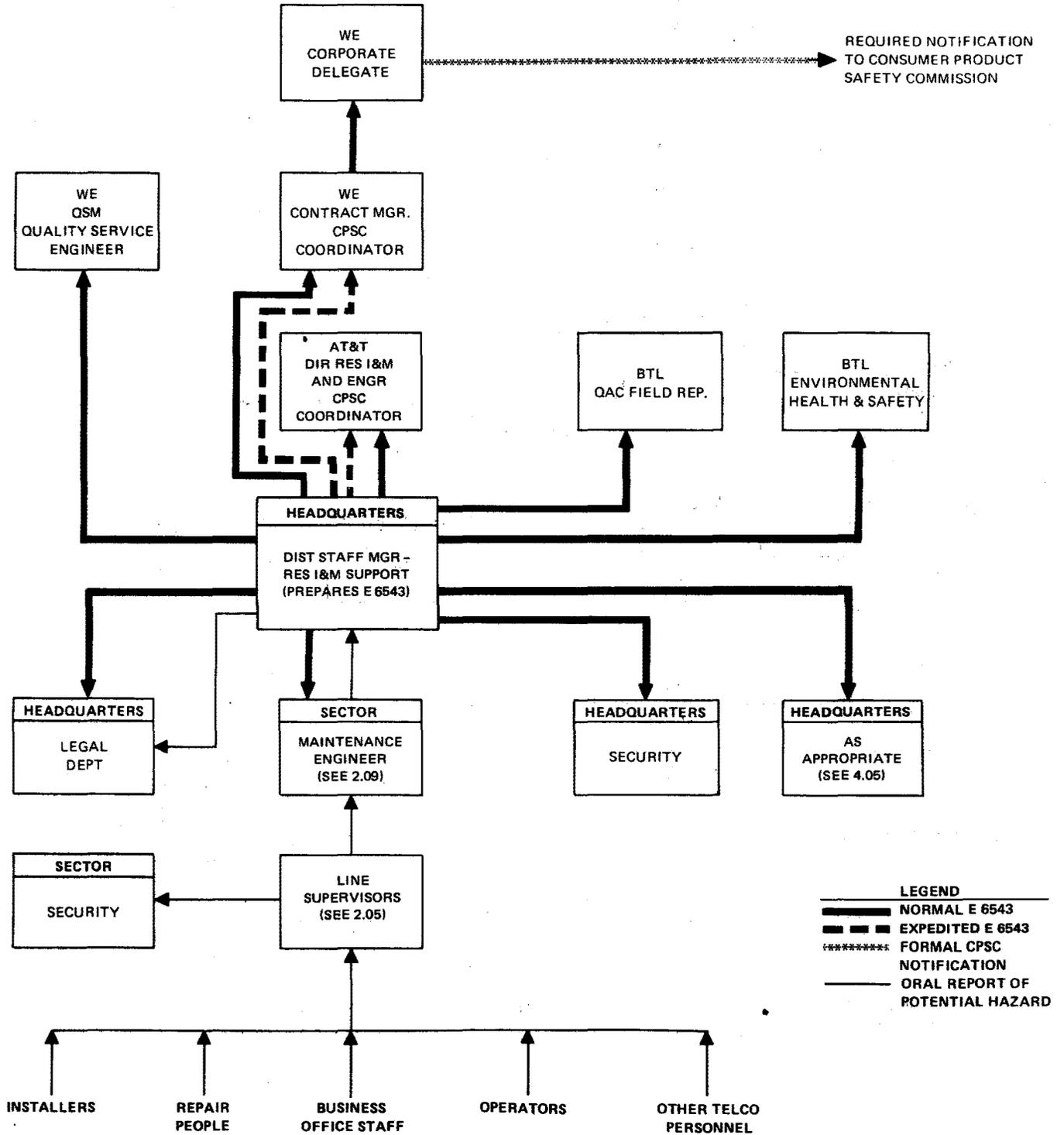
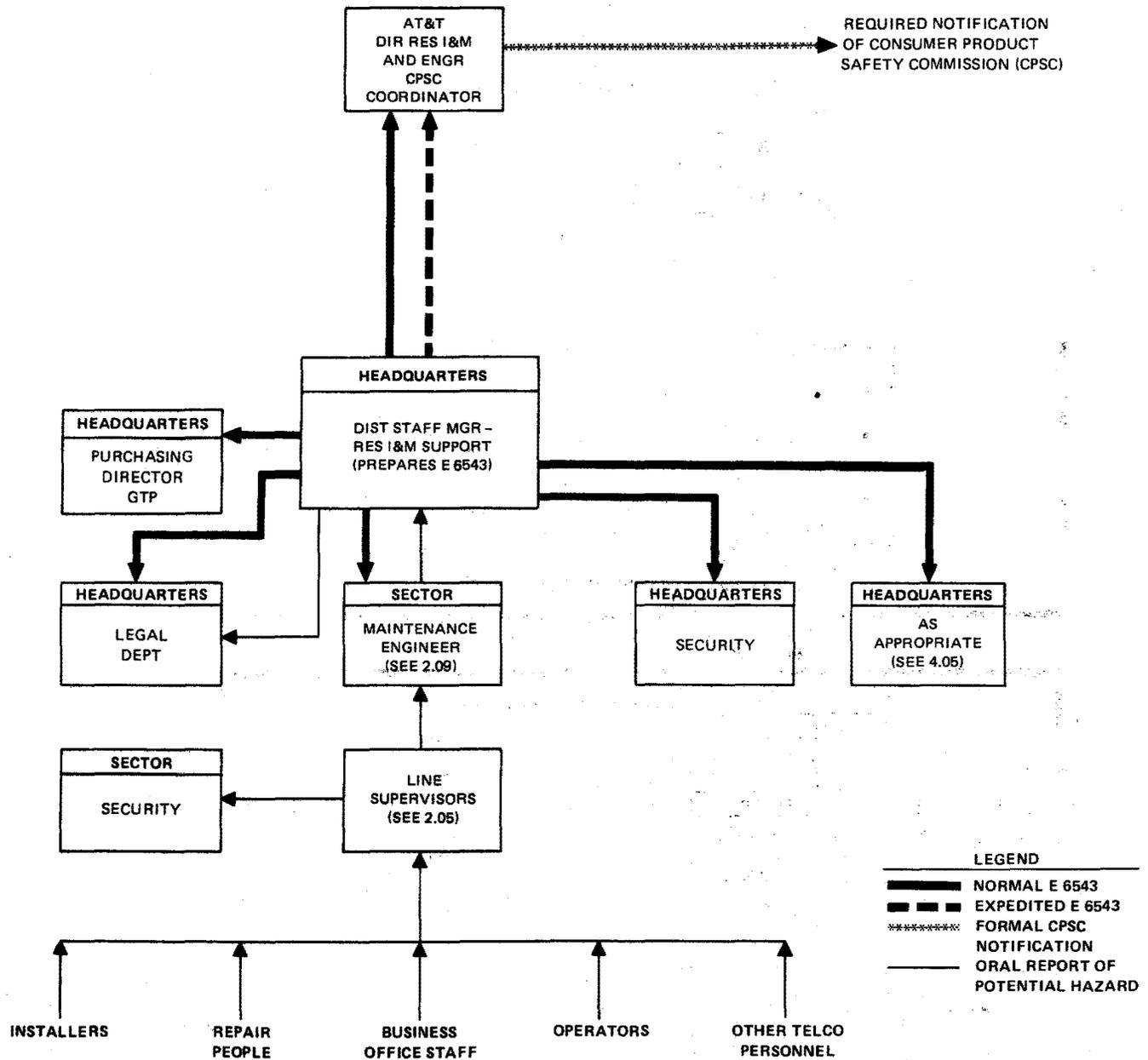


CHART B

BSPPD GENERAL TRADE CONSUMER PRODUCT REPORTING # (CPR) E-6543



FOR PRODUCTS RATED SUITABLE OR CONDITIONALLY SUITABLE IN A BSPPD PRODUCT EVALUATION REPORT OR COVERED BY A BSPPD NATIONAL CONTRACT

**INSTRUCTIONS FOR PREPARING A
CONSUMER PRODUCT REPORT (CPR) E-6543**

Reference #	Information Required
1	Check one addressee and delete the others.
2	Designate Operating Company originating report.
3	*Residence Staff to assign CPR #.
4	Engineering Complaint Number assigned by the responsible Engineering/Sector Staff Group in the normal manner, if required.
5	Type or code of defective product and system in which used (eg, Station, PBX, Data, etc).
6	Trouble Condition or hazard encountered
7	Quantity of product involved.
8	Length of service, if known or reasonable estimate.
9	Number, issue, figure and option of product drawing.
10	Number, issue, list of group of equipment drawing or number and list of KS or AT specification.
11	Name of serving Western Electric Service Center.
12	Name of manufacturer. If Western Electric, factory location.
13	Check if product is new or Class C stock, if known.
14	Customer's name, address and telephone number, if applicable.
15	Present location of defective product.
16	Furnish sufficient information to permit complete report. If space is not sufficient continue on blank sheets and staple to CPR.
17	If Customer Report, check if received by letter, telephone call or orally.
18	Name, title and telephone number of employee initiating report or to whom the customer report was initially directed and date forwarded.
19	Name, title and telephone number of the supervisor of the person designated in # 18.
20	Sector Staff comments regarding report.
21	Name and telephone number of Sector Staff representative and date.
22	Comments and disposition — *Residence Staff.
23	Indicate if Legal Action pending.
24	Name and telephone number of person (*Residence Staff) preparing report and date forwarded.

* District Staff Manager — Residence I&M Support

CONSUMER PRODUCT REPORT (CPR) E-6543																						
TO:		<input type="checkbox"/> WEC _o OSM - Quality Service Engineer <input type="checkbox"/> Bell System Purchased Products Division <input type="checkbox"/> Operating Co. Designee			1	Operating Co.		2	Engineering	4												
					CPR#		3	Complaint#														
DEFECTIVE PRODUCT — TYPE OR CODE					5	SYSTEM		5	QUANTITY DEFECTIVE		7											
TROUBLE CONDITION								6	TOTAL QTY INVOLVED		7											
LENGTH OF SRV		8	CKT DWG	9	ISS	9	FIG	9	OPT	9	EQPT DWG OR SPEC	10	ISS	10	LIST	10						
WEC _o DH OR GENERAL TRADE SUPPLY HOUSE LOCATION								11	NAME OR MFR (IF WECO, SHOW FAC LOC)		12	NEW	<input type="checkbox"/>	13	CLASS C	<input type="checkbox"/>						
CUSTOMER'S NAME				ADDRESS				TEL #				14										
LOCATION OF DEFECTIVE PRODUCT											15											
NATURE OF REPORT											16											
ORIGINATOR											CUSTOMER REPORTED BY: LETTER <input type="checkbox"/>					TEL CALL <input type="checkbox"/>		ORALLY <input type="checkbox"/>		DATE	17	
											NAME		TITLE		TEL NO		DATE FWD					
											<input type="checkbox"/> OBSERVED BY: _____											18
											<input type="checkbox"/> CUSTOMER REPORTED TO: _____											18
SUPERVISOR											19											
COMMENTS FROM PLANT STAFF											20											
NAME			TEL NO.			DATE FWD						21										
COMMENTS & DISPOSITION											22											
ENGINEERING											LEGAL ACTION PENDING		YES		NO					23		
											LAW SUIT FILED AGAINST		AT&T		WEC _o		TEL CO					
											NAME		TEL NO		DATE FWD					24		

CPR — Form E 6543
Exhibit 1