FILE NAME: Asbestos in Hair Dryers (HD)

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The Gillette Company
Prudential Tower Building
Boston, Massachusetts 02199
(617) 421-7000

Joseph E. Mullaney
General Counsel

March 22, 1974

Mr. David P. McGonigle
Inspector
Consumer Product Safety Commission
408 Atlantic Avenue - Room 208
Boston, MA 02210

Re: Consumer Product Safety Commission Investigation-
Hand Held Hair Dryers

Dear Mr. McGonigle:

Pursuant to your request which we received on Tuesday, March 19, 1974, I enclose herewith on behalf of The Gillette Company ("Gillette") part of the information requested concerning hand held hair dryers as follows:

1. Identification of all hand held dryers sold by Gillette by model number, tradename and trade introduction and termination dates as set forth in columns 2 through 5 of Exhibit A.

2. Field quantities of all hand held dryers sold by Gillette as set forth in columns 6 and 7 of Exhibit A. Also included are factory shipments and trade inventory estimates as set forth on Exhibit B. All figures are national as Gillette sells its products throughout the United States.

3. Names and addresses of manufacturers and ports of entry as set forth in columns 8 and 9 of Exhibit A.

This will also confirm that arrangements have been made to allow an authorized inspector of the Consumer Product Safety Commission (the "Commission") to select at random six samples of each hand held dryer presently being sold by Gillette from inventory located at the Gillette Manufacturing Center in St. Paul, Minnesota, our central distribution point.

We also enclose on behalf of Braun North America ("Braun"), an unincorporated division of The Gillette Company, part of the information which you similarly requested as follows:

CONFIDENTIAL

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1. Identification of all hand held dryers distributed by Braun by model number and tradename as set forth in columns 1 and 2 of Exhibit C.

2. Total quantities for the period January 1, 1969 through March 19, 1974 as set forth in column 3 of Exhibit C. Braun distributes its products throughout the United States.

3. Name of manufacturer and ports of entry as set forth in Notes 2 and 3 of Exhibit C.

It is our understanding that an authorized inspector of the Commission has already selected at random samples of the Braun hair dryers from Braun's warehouse in Cambridge, Massachusetts.

As far as the balance of the information which has been requested by the Commission, Gillette has implemented the necessary procedures to gather and collect all of this data in Boston from our various units across the country. As you may be aware, the Appliance Division was recently relocated from Chicago to Boston and the disruptive effects of the move have not yet been fully eliminated. Much of the data requested is contained in files which have not yet been unpacked and reorganized. Furthermore, many of the employees who were familiar with such files did not relocate and new employees are extracting the necessary information. We intend to supply the Commission with all of the necessary information as soon as possible.

While we have every intention of cooperating with the Commission, we do want to raise one question at this time. Section 16(b) of the Consumer Product Safety Act (the "Act") provides that every person who is a manufacturer or distributor of a consumer product shall establish and maintain such records, make such reports, and provide such information as the Commission may, by rule, reasonably require for the purposes of implementing this Act or to determine compliance with rules or orders prescribed under the Act. We are not aware that any such rule has been promulgated by the Commission. Specifically, it is unclear what procedures should be followed if we desire to keep confidential certain information which we deem to be proprietary. In the absence of any published rule of the Commission, we hereby notify the Commission that we regard the sales and quantity figures submitted herewith as confidential information within the meaning of Title 18, Section 1905, United States Code, and we hereby formally request appropriate confidential treatment of all such material.

Let me emphasize once again that we intend to fully cooperate with the Commission in gathering the necessary facts.

Very truly yours,

JEM/

HAND HELD DRYER DATA

3/20/74

Item #	Model	Trademark	Trade Introduction Date (1)	Trade Termination Date (1)	FIELD QUANTITIES (M) (2) Thru 12/31/73	Thru 2/28/74	Supplier	Port of Entry
905	THD-1	Max	10/70	1971			Yamada (3)	(5)
903	THD-2	Max	7/71	4/74			Yamada, Nishiki (4)	
902	THD-2A	Max Plus	3/72	10/73			Yamada	
907	HD-5	Super Max	6/72	7/73			"	
914	HD-6	Max for Men	6/72	11/73			"	
904	HD-4	Max	7/73	---			"	
908	HD-7	Super Max	8/73	---			"	
915	HD-9	Max for Men	8/73.	---			"	
925	HD-10	Mighty Max	11/73	---			"	

REDACTED

(1) Dates of first and last units shipped may vary a month either way; last 70% of THD-2 should ship by 4/74.

(2) Field quantities are determined by adding together the units in all lots on which a customer or consumer return has been received.

(3) Address - Yamada Electric Ind. Co., Ltd., 30-11.1 Chome Yahiro; Sumida-Ku, Tokyo, Japan

(4) Address - Nishiki Industries Inc., 36-5 Chome Kakuozan Dori, Chi-Kusaku, Nagoya, Japan

(5) On a rough estimate basis 94% of all hand-held entered through Seattle, 5% through Minneapolis, 1% through Chicago, and less than 1% through San Francisco.

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EXHIBIT A

NRD
3/21/74

HAND HELD DRYER FACTORY SHIPMENTS
(000) Units

	1971	1972	1973	2 Mos. 1974	March 1, 1974 Trade Inventory Estimate
Max HD-2					
HD-2A -					
HD-4					
Super Max HD-5					
HD-9					
Max/Men HD-3					
HD-9					
Mighty Max HD-10					
Total Max HHD					

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EXHIBIT B

G 00423

Braun North America
Hair Dryer Import Quantities
Period: January 1, 1969 - March 19, 1974

Model	Name	First Import Date	Total Period Import Quantities
HLD - 31	Braun Mini Hairdryer	August, 1972	
HLD - 6	Braun Styling Dryer	May, 1971	
HLD - 500	Braun Ultra 500	September, 1973	
HLD - 231	Braun Mini Dryer	Prior to 1969	
HLD - 4	Braun Mini-Mini Dryer	Spring, 1970	
HLD - 21 series	Braun Mini Dryer	Prior to 1969	

REDACTED

Notes:

1. Information on import quantities prior to 1969 is not available.

2. All products are manufactured by Braun AG in manufacturing facilities at Marktheidenfeld, West Germany.

3. Port of entry is Boston, MA with occasional entry through New York. Entrys in 1969 were through Toledo, Ohio.

4. Models HLD - 4 and HLD - 21 series are no longer being distributed.

EXHIBIT C