



Eliminating the Hidden Risks In Your Premium Programs

February 24, 2005



Understanding the Audience

- How many folks are in the safety business?
 - Engineers?
 - QC?
 - Regulators?
 - Marketers?
 - Brand stewards?

Actually, you're all Brand Stewards

- The new family is entrusting their kid's well-being to you
 - Mind body and spirit
- Generation XO Mom /caregiver counts on products and premiums to be good and safe for her family
- What you do is more important and impactful than ever

How can you protect Families and protect your brands?

- A lot of clients, agencies and manufacturers think they're safe by adhering to standards and guidelines like ASTM and CFRS
 - In many cases they're right
 - But not always, you can be culpable even if you follow the standards, because they are the minimum level of protection
- Some companies over enhance their requirements – taking potential value away from their customers.
 - How much “safety” is enough?
 - How do you deal with the hidden risks?

Introduction and Agenda

- Great panel offering a variety of perspectives:
 - From the client side, those who pay for it all – Liese Gross from Yum Brands
 - From the independent test lab, those who ensure compliance-Susan DeRagon from STR
 - From the those who set the standards and enforce them - Terri Rogers from CPSC
 - From the design and manufacturing perspective, the ones who have to make an exciting product, despite the hurdles established by everyone else and themselves – Nelson Smith from Strottman.
 - Each of these panelists are stellar representatives of organizations at the top of their game
 - We've asked each of them to tell you a little about themselves and their techniques for avoiding the hidden risks in premium programs

Yum Brands

- Yum Brands is one of the largest restaurant companies on the world: Pizza Hut, KFC, Taco Bell, Long John Silvers and A&W
- They have established some of the best procedures and standards
- **Liese Gross, Director, Premiums and Distribution Quality - YUM Brands,**
- 25 years experience in product and process development, quality and regulatory affairs in the food, packaging and toy premium areas.
- 8+ years with Yum Brands leading various initiatives including the development and management of the Premium Quality program and policies; and the management of the global Distribution Quality program.
- Previous to Yum, she has 10+ years experience managing various technical departments with the Sara Lee Meat Group,
- Other experience includes food product development and quality management at the T. Marzetti Co. and Rax Restaurants, Inc.
- Liese holds a B.S. degree in Food Science from The Ohio State University.

Eliminating Hidden Risks in Your Premium Program

Liese Gross
Director Premiums and Distribution Quality





Yum! Brands, Inc. A Business Perspective

- KFC, Pizza Hut, Taco Bell, Long John Silvers and A&W
- World's largest restaurant company (system restaurants)
- 33,000+ restaurants in more than 100 countries
- Global leader of the chicken, pizza, Mexican-style and quick serve seafood categories respectively
- Internationally, Yum Brands opened about 4 new restaurants each day of 2003 – making Yum! one of the fastest growing retailers in the world!!!



The Yum! Brands Premiums Business

The Yum! global premium business is a high volume, short lead time business coupled with zero-tolerance safety requirements

- # 3 in worldwide premium consumption per year
- 100+ new global and regional programs per year
- Each program consists of 4-5 individual designs
- 500+ new products each year – each designed from scratch
- Program cycle time typically 6 months.



The Yum! Brands Kid's Meal Program

– a Significant Business Driver

- ★ International and US markets rely on the Kid's Meal Program to drive sales volume
- ★ Nearly half of the premiums distributed by Yum! are in the Asian markets
- ★ Meal selection in Asia is driven by younger members of the family
- ★ The Asia/China market is experiencing double-digit growth year over year, driving volume projects of premium higher and higher
- ★ The US market requires higher tech premiums, making innovation and creativity a must



Our Primary Objective from a Quality Perspective is...

Eliminate Safety Risks to Ensure Customer Safety!!!

- Package labeling provides guidance to guardians
- All Yum! premiums are designed and tested to be “Safe for All Ages”
- Over **15,000 tests** are conducted each year to validate safety compliance

But, finished product testing alone does not ensure Customer Safety



How Do We Eliminate Safety Risks?

Key Components of the Yum! Premium Program

- Supplier Approval Process and Continuous Performance Tracking
- Laboratory Approval Process and Continuous Performance Tracking
- Factory Audit and Approval Process
- Written Policies and Guidelines
- Premium Development Process
- Premium Project Management Website and Database



Supplier and Laboratory Approval Process and Continuous Performance Tracking

Approval Process

- Financial Stability
- Experience and Capability
- Process management
- Commitment to partnership
- QA performance
- Engineering, regulatory and human factor intuitiveness
- Innovation
- Cost

Performance Assessment and Continuous Improvement

- Quality performance metrics
- Supply Chain metrics
- Marketing metrics (Suppliers)
- Written action plans



Factory Audit and Approval Process

Factory Audit Assessment

1. Pest control
2. Sanitation
3. Operations and Facility
4. Good Manufacturing Practices
5. Laboratory Practices and Training
6. Product Material and Tracking
7. Purchasing and Control of Incoming Materials
8. Product Protection and Quality Enhancements
9. Control of Non-Conforming Products
10. Process Control Performance Assessment

Ongoing Assessment

- Factories audited at least once per year to ensure compliance
- Factories disapproved with **any** production failure



Policies and Guidelines



Yum! has written policies for every critical element of the program to ensure process standardization and safety compliance

Quality and Testing Policy

- Mandatory safety standards required by individual regional governments
- Plus, additional Yum! safety requirements based on intuitive human factors, incident reports, etc

Premium Development Process

- Step-by-Step requirements and numerous supporting tools clarifying each step

Packaging Guidelines and Templates for All Polybags and Master Cartons

- Age Appropriateness grading
- Multi-national translations
- Traceability for product tracking



The Yum! Premium Development Process

Process Elements

- Step-by-Step Procedures
- Accountable person/team
- Stage-Gate Approvals
- Specific Reference Tools
- Communication templates for each step
- **Real-time** website for communicating progress, test results and approvals



The Yum Premium Development Process:

Critical *Strategic* Elements necessary for Success

“TEAM TOGETHER, TEAM APART” - *A Yum! principle*

Supplier and Laboratory Attributes

- Partners act as owners!
- Partners proactively take accountability.
- Drive continuous improvement programs to drive best practices

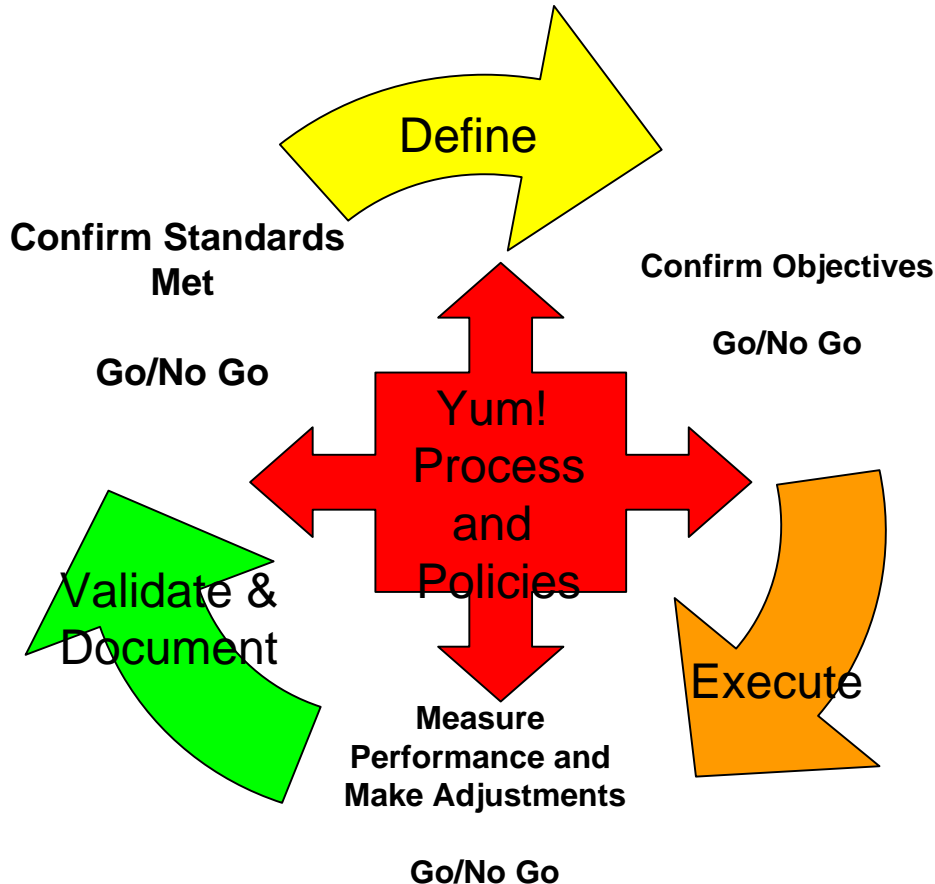
Factory Relationship

- Factories validate production capability and ensure execution



The Yum! Premium Development Process:

Critical *Tactical* Elements



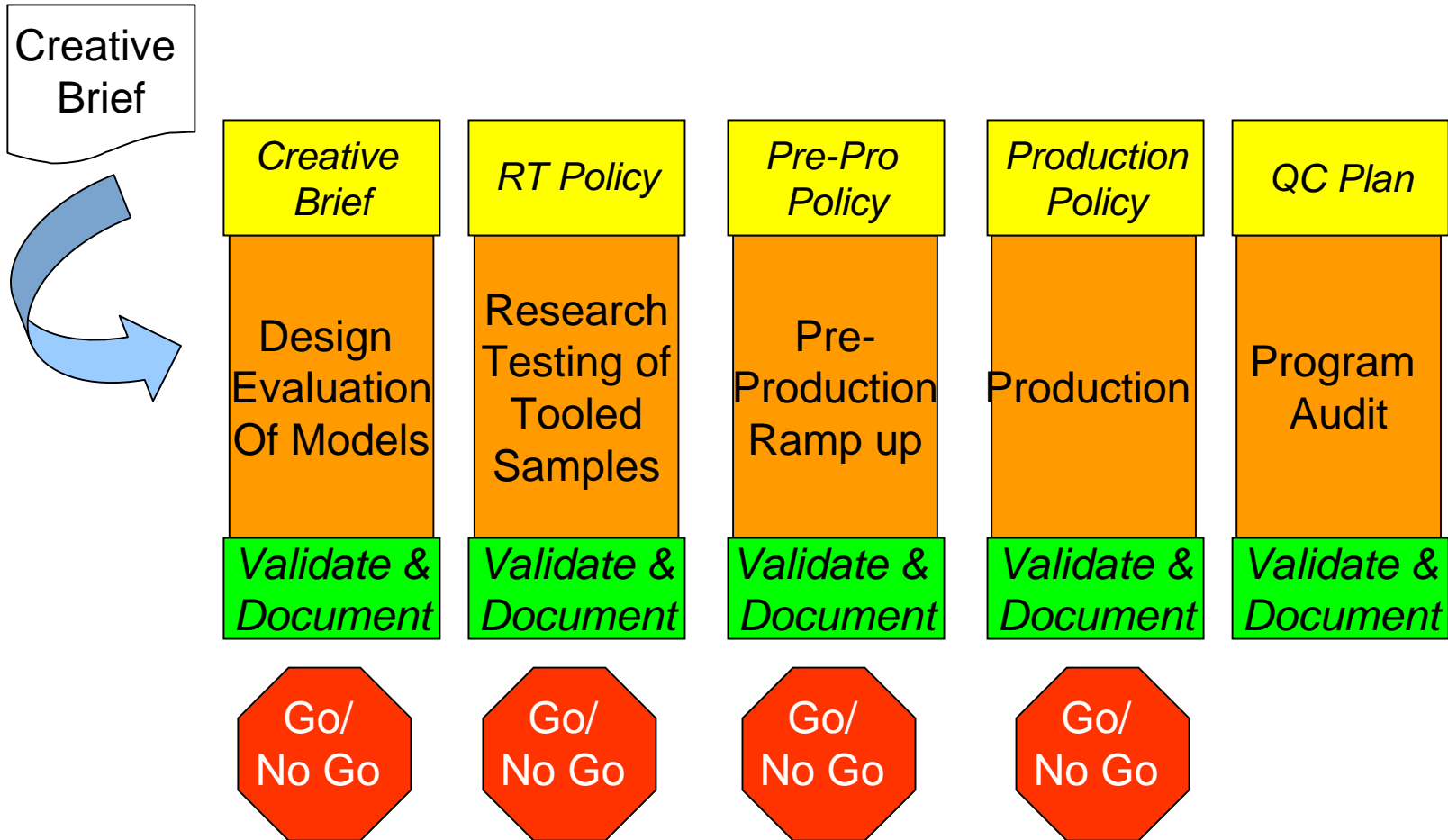
STANDARDIZATION, STANDARDIZATION and *more* STANDARDIZATION!

- Yum! Process follows a **standardized, disciplined**, critical path
- Policies and methodology clearly defined for every step of the way
- All key process stages follow a 3-step “check and balance” approach
 - Define
 - Execute
 - Validate and Document
- All documentation posted to the Yum! Premium Management website for review/approval



The Yum! Premium Development Process Overview

5 Key Stages in the Critical Path





The Yum Premium Development Process

Four Key Tools for Driving Safety

Critical tools that significantly improved safety compliance of Yum! premiums:

- ✓ **Research Testing Procedure**
- ✓ **Factory QC Plan**
- ✓ **Program Audit**
- ✓ **Premium Project Management Website**



The Yum Premium Development Process



1. Research Testing Procedure

- Mechanically test each design “to failure
- Samples produced from actual tooling

Key Deliverables:

- Report on safety assessment for each design
- Specific design modifications identified



This procedure has **virtually eliminated** physical/mechanical failures in production – Design flaws are **identified and corrected** during Research Testing, well ahead of production.



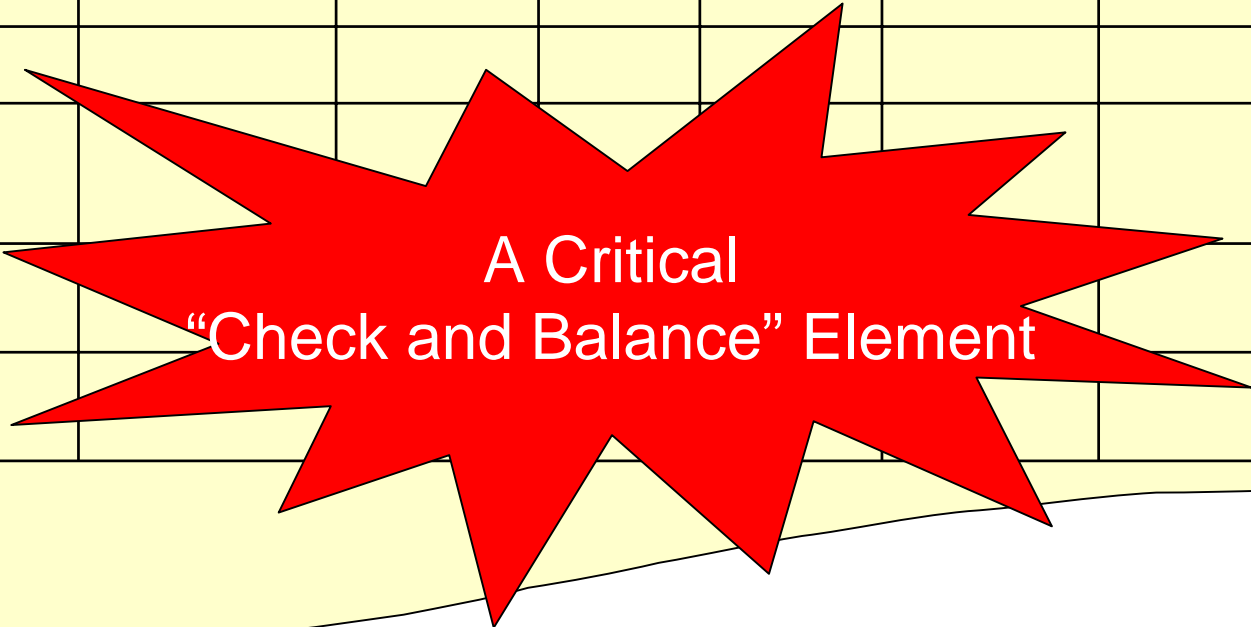
The Yum Premium Development Process



2. The Factory QC Plan

- comprehensive "road map"
- itemizes the critical Production Inspection Points

Production Inspection Point	#	Control Point	Specification/ Work Instructions	Test Procedure	Monitor By	Frequency	Actions Taken/ Dispositions	Documentation
All Inspection points identified itemized:								





The Yum Premium Development Process



3. The Program Audit

- **Design Quality & Production Readiness**
- **Equipment Calibration & Personnel Training**
- **Production Process Control – heaviest emphasis**

What Happens?

- Evaluates **all** critical inspection points
- Audit conducted by supplier and testing lab

Key Deliverables:

- Assures in-process control throughout production



The Yum Premium Development Process



4. Premium Project Management Website

Features

- Real-time, interactive tracking of all premium programs
- Cross-functional access
- Posts testing results and critical documents
- Approvals/corrective action plans done on-line
- Library housing policies, guidelines and templates
- Archive for completed programs

Benefits

- Reduced cycle time of a very detailed process
- Improved communication and decision making

The website has **significantly reduced safety risks!**



In Summary

-
- The premium business is high volume and short lead times, coupled with zero-tolerance safety requirements
 - It is a high risk business, with much to lose, if not managed properly
 - Yum! has been effective in ensuring safety through:
 - A **disciplined, data-based** and **fully comprehensive** program that covers all facets of the process that could present risk.
 - Key Components of the Yum! Premium Program:
 - ✓ Supplier and Laboratory Approval Process and Performance Tracking
 - ✓ Factory Audit and Approval Process
 - ✓ Written Policies and Guidelines
 - ✓ Disciplined Premium Development Process
 - ✓ Premium Project Management Website

The Agency perspective

- **Nelson Smith, Director, Product Integrity - Strottman Int'l.**
- Originally from the aerospace industry, where he spent 12 years as a development engineer, Nelson has...
- over 20 years experience in Toys Safety Regulations, Product Integrity, and toy safety testing arena; of those 20, he spent...
- 15 years of managing various departments for Mattel Inc., such as Worldwide Regulations & Compliance, Product Integrity, and the Product Test Lab and...
- Over two years as Director of Product Integrity for Strottman International.
- Has been an active member of ASTM committees, a voting member for others, a toy safety instructor for TIA seminars and past speaker at ICPHSO.
- Has a BS in engineering, certification as a Quality Instructor from Crosby Quality College and Business Management from UCLA.
- Co-author of the International Standards Organization's Toy Safety Standard (ISO-8124).



STROTTMAN

- As you can see, that was a very comprehensive process that Liese just described; however, what she presented was only the tip of the proverbial iceberg.
- In the very limited time that we have to present to you, we can only cover the highlights of what otherwise is –and should be– a very involved and detailed process. It requires us synchronizing our collective processes to ensure that we end up with that winning product that we’re planning to produce.
- So, how does Strottman do this? ...well, first let me tell you who Strottman is...

Strottman's Credentials

- Leading force in designing, manufacturing and distributing safe and innovative premiums for over 21 years.
- Fully staffed offices in Irvine, Chicago, Atlanta, Hong Kong, and mainland China.
- Produced over 2.5 billion premiums for promotions directed at both kids and their families
- 100% Safety record over 21 years. Never had a safety recall.
- We currently produce between 250-300 SKUs annually for our clients.
- Strottman's depth and breadth of experience with QSR premiums is second to none!

The Agency's Role

- The agency's role is to design, manufacture and deliver safe premiums, in a timely fashion, per its client's requirements
- Seems simple and straight-forward but, to accomplish, must have the proper systems, procedures and know-how in place
- ...so, how do we do this?

The Agency's Role

- The recipe for a safe premium includes the following indispensable ingredients:

Commitment

People

Knowledge

Experience

Processes

Tools

Common Sense

Commitment

- **Top Management Commitment to make safety a top priority for the company**
- **Must create a company philosophy of “perfection” when it comes to safety (anything less is simply not acceptable)**
- **Must require accountability from its people and also provide them with the proper incentives to ensure adherence to this philosophy**

People

- The right people in the right places
- Knowledgeable and experienced PI department staff (in-house; but, if not financially able to do this, then contract a Lab)
- Manufacturing QC team in place; on site (don't rely on the manufacturing plant to check itself – trust but verify).
- Project teams that are really committed to the company safety philosophy

Knowledge

- **Quality Assurance** (SPC, Poka Yoke, Benchmarking, Testing Plans, NPD process)
- **Toy safety regulations** (internal/client/domestic/international)
- **Injury data** (by toy type, by age bracket)
- **Recall data** (by toy type, injury type, age bracket)
- **Child behavioral science/Human Factors**
- **Applicability** (know what, when, where, how & why and explain this to your team; it will make your job easier if you have buy in)
- **Design & Manufacturing** (not just intrinsically, but design for quality & design for safety)

Experience

- In the toy industry/toy premiums arena
- In knowing how/when to apply which regulations
- In providing the proper safety input at early stages of the product development process
- In manufacturing processes and application of QA/QC tools (such as QA plans, manufacturing flow charts, SPC)
- In the product development process

- **Knowledge and experience pick-up where regulations leave-off. Remember that toy safety regulations are only minimum requirements and they cannot account for all situations and unexpected play patters.**
- **This is where knowledge and experience come into play, this is where several companies have gotten themselves into trouble with recalls of products that met all regulations, yet failed to protect the child.**

Process

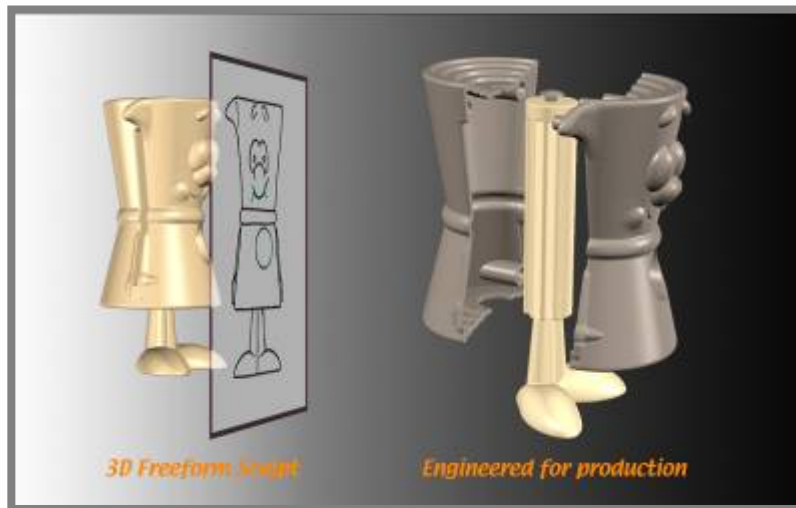
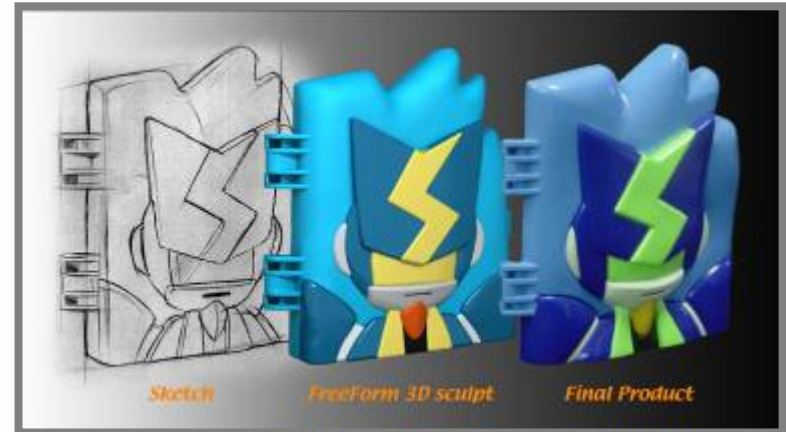
- **Must have a formal process** (established; covering from crib to crypt; including design, development, manufacturing & distribution)
- **Must be strictly adhered to**
- **Supported by proper documentation**
- **...and Documentation Change Management System**
- **TQM (Quality & Safety has to be everybody's job)**

Tools

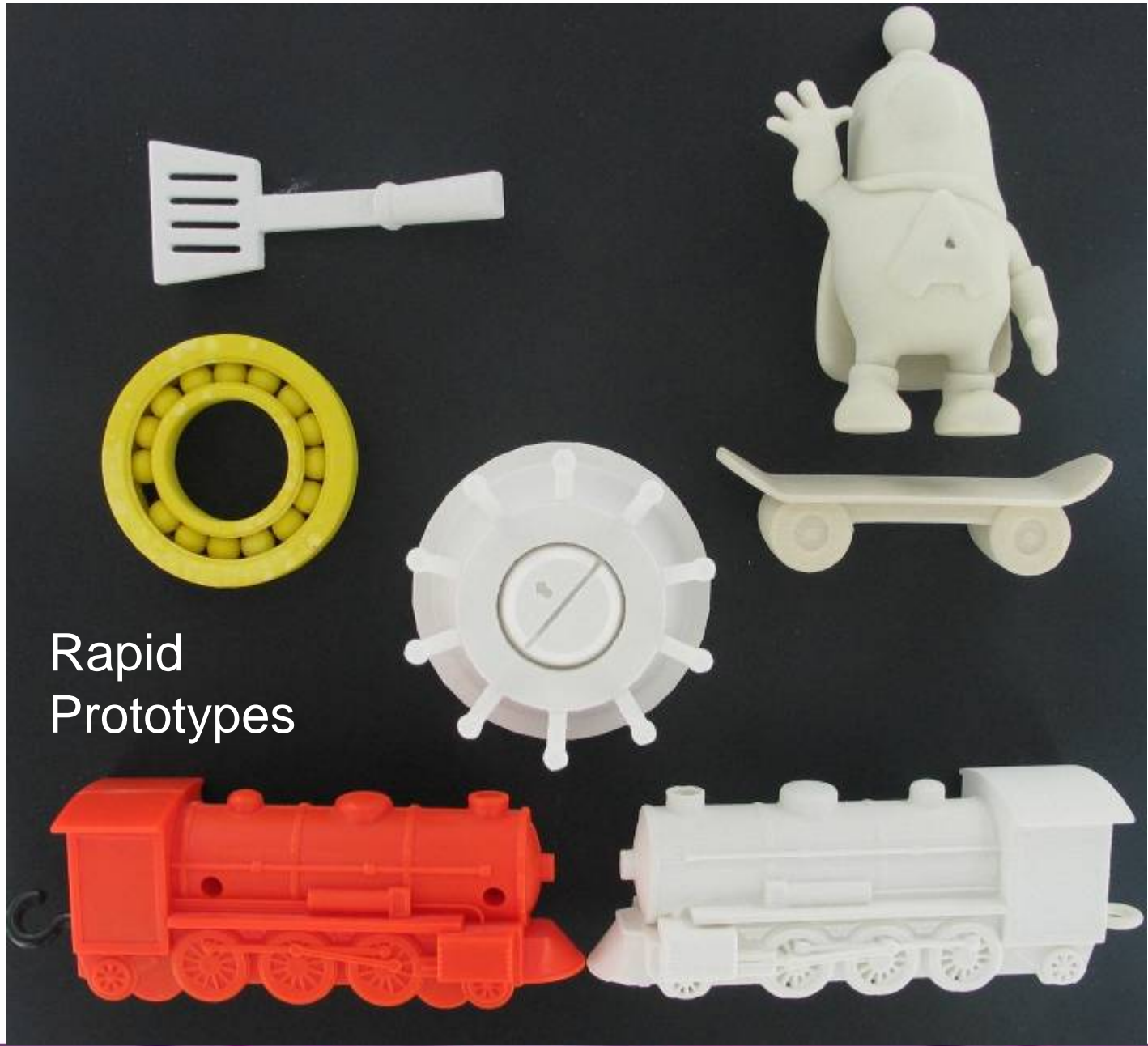
- Client requirements
- Toy Safety Regulatory Docs
- PI manual (incorporating your own internal requirements/procedures)
- Toy Safety Labs (use them as the unbiased agent)
- US Consumer Product Safety Commission (CPSC)
- QA/QC tools (Benchmarking, Virtual Safety Testing, Rapid Prototyping, Solid Works, Rhino, KnowHow System, Online Project Management System, Independent Labs)
- Company procedures (such as an NPD process where Safety is “hard-wired” to the product development cycle)
- C-TPAT certification (Customs-Trade Partnership against Terrorism)

Design for safety

- Free-Form virtual sculpting
- Rapid prototyping
- Virtual engineering and safety testing



Rapid
Prototypes



- **Once you have the 3-drawings in your computer system, you can use the latest technology in virtual testing using a Finite Element Analysis program and before you even ever make your first toy, you can test against all the gauges and even simulate tension and drop testing to find out where the product, as designed, might fail.**
- **Armed with this information you only need to beef up the sections where the product is weak, thus avoiding expensive overuse of plastic beefing up areas that are not necessary. This saves you time, money and headaches down the road.**

Common Sense



- **I like this one because people’s reaction is “DUH!, of course you need to use common sense!!!” ...but you would be surprised how many times I’ve come across situations totally lacking in this most important recipe item. If you go by the technical documents alone and don’t apply common sense, you will get into trouble sooner or later (most likely sooner). So don’t operate blindly, use your deductive reasoning and common sense when making decisions or applying safety regulations.**

So, ...how we do this?

Company **Commitment**

The right **People**

Knowledgeable

Experienced

Processes implemented & followed

Apply available **Tools**

Use **Common Sense**

The Lab Perspective

- **Susan DeRagon, Manager, Toys & Premiums - STR**, has worked in the Consumer Product Testing and Quality Assurance Division of Specialized Technology Resources, Inc. (STR) since 1985, with her primary focus on toys and toy premiums. As Manager of Toys & Premiums, she has oversight of an ever-expanding team of professionals based in Hong Kong, China and the USA that currently include dedicated human factors specialists and risk analysts along with project coordinators, technical specialists, and manufacturing and quality engineers. Sue works with a variety of companies in reviewing products from concept stage through finished product quality assurance testing and inspections. She has conducted technical seminars on toy safety testing for US and International clients, supervised focus groups to assess toy safety as well as toy appeal and play patterns, and is currently involved in a research study related to toy premiums. Sue is a member of TIA and ASTM, and holds a B.S. degree in Business Management.



WORKING WITH

"THE LAB"





Premiums are Critical

- High volume
- Custom product
- High distribution velocity
- Inflexible time frame
- Lack of consumer choice
- High liability consumers



QA Program & Partner

- Not just testing
- Expertise on regulations, current and proposed
- Potential hazards not covered by standards – human factors concerns
- Independent and certified
- Your “eyes and ears”



Worldwide Laboratory Locations

- **USA – Enfield, CT (ISO 9001:2000)** 
 - Los Angeles, California
 - Canton, Massachusetts
 - Hoboken, New Jersey
- **Hong Kong – Kwai Chung (HOKLAS)** 
- **People's Republic of China (CNAL)** 
 - Shenzhen, Shanghai
- **Singapore** 
- **Taiwan - Taipei** 
- **United Kingdom (UKAS)** 
- **Switzerland (ISO 9001:2000 / ISO 17025)** 
- **Italy – Como (ISO 17025)** 
- **Turkey – Istanbul (ISO 17025)** 
- **Peru – Lima (ISO 9001:2000)** 
- **India – Mumbai** 
- **France - Lyon** 

Involve “The Lab” Early

- Concept review
- Design evaluation

Design out the hazard before customer buys into the design, or before tooling is started.



"The Lab's" Tools

- International safety standards
- Recall information
- FOIA requests
- NEISS database
- Anthropometric data
- Focus group studies
- Social science and Medical publications
- Models, gauges and test fixtures
- Industry affiliations
- Internal library
- CPSC Age Determination Guidelines

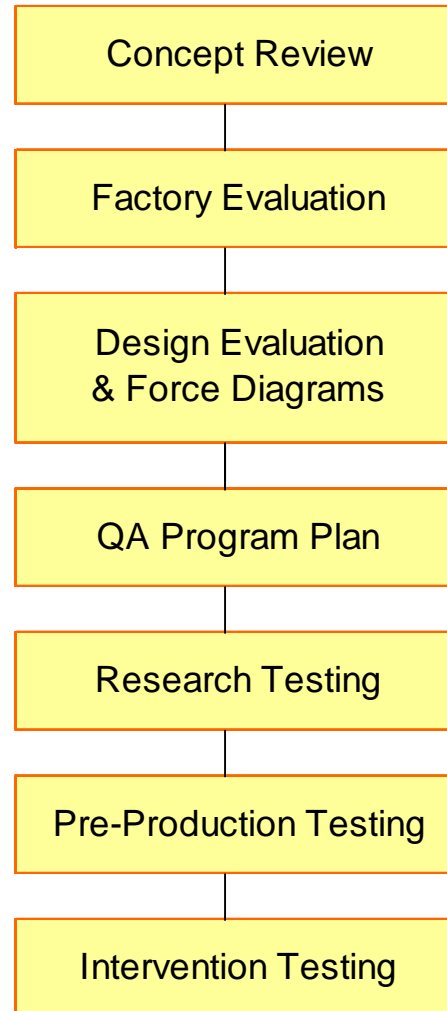


Prevention, not Detection

- Factory evaluation
 - Flowchart and QC plan review
- Enhanced test criteria
 - Research testing
- Statistically significant testing
 - Sample size and frequency
- Raw materials/preproduction testing



Premium Process Flow





Full QA Programs Save Money

- Average estimated cost of premium test failure = \$31,000
 - Sorting and reworking or scrapping
 - Mold modifications/additions
 - Air freight
 - Retesting charges
 - Administrative costs

Common Goal

- To bring premiums to market
 - That are safe
 - That are shipped on time
 - That are manufactured in a cost effective way
 - That your customers will enjoy

The Regulatory Perspective

Terri Rogers, Associate Director, Recalls and Compliance Division, U.S. CPSC

- Ms. Rogers manages the Children's Products Team in the Office of Compliance. This team is responsible for interpreting CPSC standards and regulations, developing Compliance programs to enforce the regulations and investigating potentially hazardous products and negotiating recalls with manufacturers of toys and children's products. Before assuming her current position, Ms. Rogers was the senior compliance officer on the Children's Products Team, serving as principal advisor to the Director of Compliance on safety issues related to toys and juvenile products. Ms. Rogers has been a featured speaker at seminars on product safety issues sponsored by the American Bar Association and several industry trade associations. She helped develop and coordinate the Commission's Fast Track Product Recall Program. Prior to joining the Office of Compliance, Ms. Rogers was the CPSC Project Manager for Children's Products. She joined CPSC when it began operating in May 1973.

Using Toys As Premiums



*ICPHSO Workshop
Orlando, Florida
February 24, 2005*

The comments expressed here are my own and have not been reviewed or approved by the Commission, and may not necessarily reflect those of the Commission.

CPSC REGULATIONS FOR CHILDREN'S PRODUCTS

- **Small Parts Ban** 16 CFR Part 1501
- **Ban of Small Balls for Children Under 3 years** 16 CFR § 1500.18(a)(17)
- **Toy, Balloon, Marble, Small Ball Labeling** 16 CFR § 1500.19
- **Sharp Point Technical Requirements** 16 CFR § 1500.48
- **Sharp Edge Technical Requirements** 16 CFR § 1500.49

CPSC REGULATIONS FOR CHILDREN'S PRODUCTS

- ▶ Lead Paint Ban 16 CFR Part 1303
- ▶ Guidance re Lead 16 CFR § 1500.230
- ▶ Guidance re Hazardous Liquid Chemicals 16 CFR §1500.231
- ▶ Interim Enforcement Policy for Children's Metal Jewelry Containing Lead, February 3, 2005
- ◆ Use and Abuse Testing Procedures 16 CFR § 1500.50, 51, 52, and 53

SMALL PARTS REGULATION

- ✦ Small parts present choking, aspiration and ingestion hazards.
- ✦ Children who ingest small parts can suffocate and die.

SMALL PARTS REGULATION

- Bans toys intended for use by children under 3 years that have small parts
- A small part is one that can fit into a small parts cylinder specified in the regulation

Other Items Known to be Choking Hazards

- Small Balls--1.75” in diameter or less-- are now banned for children under 3 and must carry choking warnings for children 3 and over.
- Balloons--not recommended for children under 8 without adult supervision. Must be labeled if sold in package or bin.
- Marbles

Child Safety Protection Act

Labeling Requirements

- **Must be on the principal display panel of the product.**
- **For bulk items, the display container, bin, or vending machine must be labeled.**

Industry Standard, ASTM F963



Designation: F 963 – 96a

AMERICAN SOCIETY FOR TESTING AND MATERIALS
100 Barr Harbor Dr., West Conshohocken, PA 19428
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If not listed in the current combined index, will appear in the next edition.

An American National Standard

Standard Consumer Safety Specification on Toy Safety¹

This standard is issued under the fixed designation F 963; the number immediately following the designation indicates the year of original adoption or, in the case of revision, the year of last revision. A number in parentheses indicates the year of last reapproval. A superscript epsilon (ϵ) indicates an editorial change since the last revision or reapproval.

INTRODUCTION

The purpose of this consumer safety specification is to establish nationally recognized safety requirements for toys. Although this specification will not eliminate the need for the exercise of parental responsibility in selecting toys appropriate to the age of a child, or parental supervision in situations in which children of various ages may have access to the same toys, its application will minimize accidents in the normal, intended use and reasonably foreseeable abuse of the toys covered by this specification. This specification was developed originally as a Voluntary Product Standard under the auspices of the National Bureau of Standards, Department of Commerce, and published in 1976 (PS 72-76). The present revision is intended to update the safety requirements to include the following by reference: published federal mandatory requirements, relevant voluntary standards, certain new requirements for addressing potential hazards, and several technical revisions based on producer experience with the original standard. In addition, where appropriate, test criteria have been updated to reflect more current anthropometric data on U.S. children.

Request from ASTM: www.astm.org or (610) 832-9585

Age Grading

- Age grading is ESSENTIAL in any successful premium program.
- All toys need to be age graded to determine what regulations and industry safety standards apply, including premiums.

Age Grading Guidelines

- “Age Determination Guidelines: Relating Children’s Ages to Toy Characteristics and Play Behavior” September 2002
- CPSC Web Site
- CPSC Office of the Secretary

Recommendations for Premium Programs

- Offer toys that meet all applicable CPSC regulations and industry safety standards.
- Offer toys that are properly age-graded.

Recommendations for Premium Programs

- Offer a premium toy that is appropriate for a wide age range, such as a simple soft plush toy.

Recommendations for Premium Programs

- Offer consumers an opportunity to order the premium through mail, toll-free telephone number or web site and clearly provide the recommended age information with the item.

Recommendations for Premium Programs

- In restaurants and similar places where premiums are being handed out, offer consumers a choice of items recommended for different ages and label each accordingly.
- Provide information to consumers.
- Provide toys of equal value.

Recommendations for Premium Programs

- Use a testing laboratory, human factors expert, toy company.
- Develop marketing and distribution plans that incorporate all levels.
- Develop a recall strategy--plan for the unexpected.
- Be aware of industry problems--check CPSC site for recall information and CPSC Clearinghouse for incident/complaint data.

Recommendations for Premium Programs

- Age-grade each toy (but test for “all”)
- Put the recommended age on each package.
- Age recommendation should be prominent (both retailer and consumer should be able to see instantly).
- If the toy is for children from 18 months to 35 months, label it accordingly. Do not just use “Under 3” or “Birth and up”.

Examples of Premium Toy Labeling That Can Be Misleading

- **Safety tested for children of all ages**
- **Tested and recommended for children of all ages**
- **0+**
- **Recommended for all ages.**

All of these imply the toy is recommended for a newborn infant as well as a 2-year-old child.

WWW.CPSC.GOV
WWW.RECALLS.GOV

Questions and Answers



It's time to play avoiding Jeopardy

- That crazy new audience participation game show where we reinforce the most important points from today's presentation.
- If you know the answer Buzz in.
- Remember, since this is avoiding Jeopardy please form your answers in the form of an answer.
- Everybody clear?
- Let's play the game

Avoiding Jeopardy Questions:

1. From Terri's presentation: What 4 things does every premium manufacturer need to avoid to keep kids safer :
A: Small parts, balls, balloons and marbles
2. From Liese's presentation: What is the first thing a client company should establish
A: Establish a workable Process (also credit for policy, procedures or website)
3. From Nelson's presentation: What is the single most important thing to achieve when establishing a PI program?
A: Top management commitment and endorsement
4. From Sue's presentation: What is the single most important thing you can do to avoid a recall and its subsequent costs
A: Engage the lab early, let them help you develop the toys.
5. Extra credit: What are the 2 ways do you need to age grade premiums:
A: Safety and age appropriateness



Eliminating the Hidden Risks In Your Premium Programs



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