

December 5, 2006

National Highway Traffic Safety Administration  
Office of Vehicle Safety Compliance  
NVS-222  
400 Seventh Street SW, Room 6111  
Washington, DC 20590

Re: Tucker Rocky Distributing Response, NVS-222CCo/OA-218-060804

Dear Jeffrey Giuseppe and Claudia Covell:

Tucker Rocky Distributing ("Tucker Rocky") response to the information request NVS-222CCo/OA-218-060804 is enclosed.

With this request, find two copies of the following documents:

- A. Tucker Rocky's Response to Information Request NVS-222CCo/OA-218-060804
- B. Letter to Office of Chief Counsel with confidentiality request.
- C. Table listing Cyber U-12 helmets that Tong Ho Hsing Industrial Co., Ltd. certified as being FMVSS No. 218 compliant, TR 0284.
- D. Cyber U-12 Helmet Sales Reports, TR 0285 through TR 0288.
- E. HPRL test, report number 06-1036-05, TR 0308 through TR 00326.
- F. HPRL test, report number 06-1036-06, TR 0289 through TR 0307.
- G. HPRL test, report number 06-1036-03, TR 0092 through TR 0111.
- H. SwRI test, project number 18.18081.02.1033, TR 0131 through TR 0275.
- I. Tong Ho Hsing Industrial Co., Ltd. batch test 94011801, TR 0327 through TR 0328.

**Responses To Specific Requests for NVS-222CCo/OA-218-060804**

1. Manufacturers, including importers, of motor vehicle equipment to which a motor vehicle safety standard applies are required to submit identifying information and a description of the items they produce, in accordance with 49 C.F.R. Part 566.
  - a. State whether you import the subject motorcycle helmets into the United States for the purposes of resale. If you do import the subject motorcycle helmets into the United States, state the full individual, partnership, or corporate name used on your most recent Part 566 submission.

Response: Ed Tucker Distribution, Inc. d/b/a Tucker Rocky Distributing ("Tucker Rocky") imports Cyber model U-12 motorcycle helmets into the United States for resale. Tucker Rocky has been unable to locate a Part 566 submission for Tucker Rocky. The corporate information for Ed Tucker Distribution, Inc. is as follows:

Ed Tucker Distributor, Inc.  
4900 Alliance Gateway Freeway  
Fort Worth, TX 76177

Incorporated in the State of Texas of 03/30/1970

The only major vehicle equipment Tucker Rocky sells to which a motor vehicle safety standard applies is motorcycle helmets.  
(Tucker Rocky 11/20/06)

- b. If you do not consider yourself the importer of the subject motorcycle helmet, state the name, address, and phone number of the person or entity that does import the subject motorcycle helmet into the United States.

Response: 1b is not applicable, see response for 1a. (Tucker Rocky 11/20/06)

2. Concerning the Cyber model U-12 motorcycle helmet:

- a. Provide the corporate name of the company and address of the facility where the subject motorcycle helmets are manufactured.

Response: The name of the manufacturing company is: Tong Ho Hsing Industrial Co., Ltd. The address is: No. 307 Sec. 3 Wen Hua St, Nan Hsing Tsuen, Kuei Jen Shiang, Tainan, Taiwan R.O.C. (THH 11/20/06)

- b. State the full individual, partnership, or corporate name used on the foreign manufacturer's most recent Part 566 submission.