

*From the April 2003 issue of Gun Industry Litigation Reporter:*

## **An Evaluation of Notices Used in Firearm Recalls: 1982-2002**

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Although firearms are exempt from the jurisdiction of federal agencies such as the U.S. Consumer Product Safety Commission to order a recall/retrofit or declare products “substantial product hazards”, each year firearm manufacturers nevertheless undertake recall/retrofit consumer notification programs to retrieve previously sold products.

In this paper, we examine the different types of advertisement notices the firearms industry has utilized over the past twenty years to publicize recall and retrofit programs, and examine how well these efforts embody many of the key characteristics that determine a program’s success. Most programs conducted by manufacturers are retrofit programs, in which the manufacturer offers a mechanical fix for the recalled firearm, frequently in the form of a design change (e.g., a transfer bar) to reduce the possibility of accidental discharge.

We examined recall notices for twenty-four retrofit/recall programs (conducted by eleven manufacturers) between 1982 and 2002. All notices reviewed involved recalls for accidental discharge hazards and appeared in highly visible firearms publications (such as Guns,

Guns and Ammo). Our focus was on how well these programs embody many of the critical communications characteristics that distinguish effective efforts from less effective ones. We did not rate notification programs on the basis of notice design and layout, and our evaluations do not reflect subsequent corrective measures the manufacturer may have taken. While the notification programs discussed do not constitute a representative sample in a statistical sense, they illustrate both the wide variety and varying quality of what manufacturers do when faced with the need to conduct a firearms recall or retrofit. Each notification program we examined is generally summarized in Exhibit I.

A well-designed recall program involves several elements of communication – attention getting; clear and consistent notice to product users informing them of the problem and its safety implications; absence of conflicting messages; instructions for safe behavior during the retrofit period; and “user friendliness” of the program<sup>1</sup>. While these are not the only criteria for an effective notification program, they are among the most important, and provide a good index of whether or not a program is likely to be effective. We translated these elements into nine specific

categories on which each notification was rated. These were: (1) use of alert words; (2) use of pictorials; (3) no qualification to indicate rarity of hazardous event; (4) no blame of firearm user; (5) indication of applicable safety precautions during recall period; (6) offer to reimburse costs of the retrofit; (7) presence of toll-free number; (8) use of incentives to participate; and (9) whether the recall program is mentioned on the manufacturer's web site.

For each category, a manufacturer's notice was assigned either a plus (worth one rating point) if the ad met an applicable criterion, and a minus (worth a deduction of one point) if it did not. Each of the rating criteria and its application is discussed below. An overall summary of the category rating results is contained in Exhibit 2.

While recall notices share many characteristics with warnings and other safety communications, the fact that the recall message is separate from the pre-purchase search for information and the actual purchase and use of the product, makes it more difficult to present it to a user in a setting that will be noticed and comprehended.<sup>2</sup>

**1. Use of Alert Words.** Effective recalls depend on effective communication. To maximize comprehension, one of the keys to an effective notice is to get the user's attention. Studies have shown that in the product safety warnings and notification context, product users are more likely to retain and respond to messages with stronger language.<sup>3</sup>

A 1999 study by Braun and Shaver<sup>4</sup> stressed the importance of alert words such as Danger and Warning in a notice to get the users attention. Because people may get distracted, it is important to get the safety message to the user as soon as possible and use wording commensurate with the risk the product poses.<sup>5</sup>

Generally, firearms manufacturers have used strong alert words. Examples include, "Product Warning and Recall Notice, Important Warning, Important Warning To All Owners Of ...". There are exceptions, however. Sturm-Ruger's 1982 retrofit of its single-six revolver led off its ad with a neutral phrase "Do you own this gun?" and went on immediately afterwards (misleadingly) to characterize its recall program merely as a "unique new improvement." A design change that substantially reduces the likelihood of an accidental discharge is much more than a "unique new improvement". In 1988, Colt used similar language for its 380 semi automatic pistol in (under) stating "we are incorporating a safety improvement."

In our ratings system, twenty-three of twenty-four notices earned points for using strong alert words.

**2. Use of Pictorials.** The combination of a message and picture can increase recall awareness and the user's retention of information.<sup>6</sup> In its recall guidelines to manufacturers, the Consumer Product Safety Commission states "Wherever possible, the (recall notice) should contain a graphic illustration or photograph of the product to aid consumers in identifying the product."<sup>7</sup> The fact that firearms hazard severity is so

high makes the use of pictorials especially appropriate to disseminate information. A study of warnings on saws found that for products that are perceived as hazardous, the highest compliance with instructions was achieved with warning signs that used a combination of words and a pictograph.<sup>8</sup> Other studies strongly suggest the human processing system is most efficient in comprehension when the pictorial mode is used.<sup>9</sup>

Of twenty-four notices reviewed, ten contained a picture of the firearm.

### **3. Undermining Hazard Severity and the Consequences/Likelihood of an Accident.**

The manufacturer should warn users what the potential consequences of not addressing the product defect may be so they can make an informed choice whether or not to participate in the recall program. The notice should clearly explain the reason for the recall, including accurate injury or potential injury information.<sup>10</sup>

For example, a 2001 Vanguard Weatherby Rifle recall and a 2002 recall by Howa Machinery refers to their recalls as “safety upgrades” which if not corrected, can lead to “accidental discharge and cause severe injury”. It is inaccurate and misleading to state that the need to change a rifle’s firing mechanism to prevent it from accidentally discharging is an optional safety feature. An accidental discharge of a firearm can cause severe injury or death. A 1996 notice for Steyr-Mannlicher rifle refers to the “possibly dangerous condition of a rifle firing unintentionally.” It is a dangerous condition, not a possibly dangerous condition.

A manufacturer should not use phrases that undermine the urgency of his notice by sending a mitigating or conflicting message. One way of doing this is to indicate how unlikely an injury-producing event such as an accidental discharge really is. Even if true, the qualifier undermines the notice’s major purpose, which is to galvanize users into action. For instance, Remington twice indicated that “although it is unlikely, the rifle could fire.” Ruger similarly admonished “in extreme cases, the rifle can fire unexpectedly.” In this category, a minus was awarded if language in the notice indicated an accidental discharge was unlikely to occur, or if the notice specifically undermined the severity of the hazard.

Of twenty-four notices reviewed, eight received minuses for undermining the hazard severity or accident consequences.

**4. No Blame of User.** Another way recall notices are undermined is to shift the focus of attention from what should be the main message of communicating problems with the firearm to discussing instead various ways in which the user may be to blame. An effective notice focuses on the product and does not blame the user.<sup>11</sup>

The focus on user conduct detracts from the perception of the hazard. Hazard severity plays a significant role in risk perception. Studies have shown severity of outcome is the best predictor of hazard perception.<sup>12</sup>

For example, Colt’s 1984 25 ACP pistol recall states the pistol is “susceptible to accidental discharge if improperly carried with a round in the chamber, and dropped or otherwise carelessly mishandled.” This

language detracts from the recall program's effectiveness because users are not likely to view themselves as "careless" or "improper handlers", and thus may not view the recall as applicable to them.<sup>13</sup>

In its notices, Colt told users "If you drop almost any fully loaded gun...it can go off if it has a round in the chamber. Also, the "half cock" notch is not a carrying safety, because if the hammer is not securely engaged in its notch, the gun can accidentally discharge." The notice never addressed the potential susceptibility to accidental discharge when it added, "Does this mean that handguns, even Colts, are dangerous? No! But when people don't abide by 150 years of established safety requirements, then can make them dangerous for all of us." Likewise, a Colt 1987 notice for a single six safety told users: "Always rest the hammer over an empty chamber" ...accidental discharge may occur through mishandling such as a careless blow to the hammer or excessive force being applied to the trigger." Similarly, Steyr-Mannlicher's 1996 notice warned "serious personal injury or death could result from an unintentional discharge if other safety rules are violated." Most firearms users do not view themselves as violating safety rules, careless or likely to be using excessive force, and they may be less likely to act when those concepts appear in a notice to them.

Ruger blamed the user in its notices designed to get their cooperation. In its 1982 to 1988 Blackhawk notices, referring to the installation of a transfer bar to prevent accidental discharge, Ruger stated "the conversion will help prevent accidental discharges caused by a blow to the hammer

if the user has failed to take the basic safety precaution of keeping an empty chamber under the hammer." Likewise, in its 1985 Mark II .22 caliber pistol recall, Ruger admonished owners to "always keep the muzzle pointed in a safe direction, regardless of the position of the safety, and never rely on any mechanical safety device to justify careless handling of any firearm."

Other manufacturers blamed firearms owners for causing accidental discharges by "unnaturally" manipulating their firearms and providing an abnormal amount of force. Browning blamed the user in its 1987 recall of Over and Under Shotguns and Express Rifles by maintaining "it is sometimes possible for these specific guns to accidentally discharge upon opening the gun, following a series of rather unnatural manipulations of the selector safety." Springfield Armory's 1988 recall of safeties on its MIA's, M14's, Garrands and Berettas warned "(these guns) could contain safeties that can be disengaged by applying an abnormal amount of force to the trigger, thus overriding the safety." Again, the issue in an effective product recall notice should be the product; raising issues of careless use diverts from the main message.

In this "no blame of user" category, a plus was awarded if the user was not blamed, either explicitly or by implication, for contributing to the product hazard. A minus was awarded if the user was in some manner blamed for the defect. Notice in the ad as to what actions the firearm user should take or avoid prior to having the firearm retrofitted did not count as an implied assignment of blame to users.

In seven of the twenty-four notices reviewed, the user is in some capacity blamed for the firearm's defects.

**5.Safe User Behavior During the Retrofit Period.** If the defect subject to retrofit can potentially cause serious injury or death, and the product user is not aware of the situation, the firearms user should be instructed in the notice to refrain from use until retrofitting has occurred.

The most direct and effective warning notice to refrain from use was probably provided by Stoegger Industries' recall of Llama 9mm pistols and Winchester's recall of Model 100 Rifles. Stoegger stated "Take Notice That This Pistol Is Dangerous and Should Not Be Used Until The Pistol Is Corrected." Winchester went the farthest in recommending not only that the user refrain from use but that he make the pistol "inoperable by removing the firing pin." Steyr-Mannlicher in 1996 warned the user not to "Load, Fire or Otherwise Use The Rifle." Weatherby and Howa Machinery in 2001 and 2002 warned "Stop Using Your Rifle Immediately."

Browning – in two recalls from 1988 to 1990 for its A-500 Shotguns and .22 magnum Rimfire-A-Bolt-Rifles – consistently warned against loading or using the gun until the recall was complete, frequently using bold print. Likewise, Colt warned "we urge that you do not use your Colt 380 until you make this change." Remington too, with bold print, urged cessation of use in the interim period.

Some manufacturers took an inconsistent approach to the interim warning

question. For instance, Ruger conducted four gun recalls from 1982 to 1991. Two of them warned, "Do not use the pistol." One of them curiously warned "Always Keep The Pistol Pointed In A Safe Direction." The fourth had no relevant warning. Smith & Wesson conducted two gun recalls. In one, S & W had no interim usage warning; in the other they indicated in bold print: "Do Not Use .357 Magnum Ammunition Until You Have Had The Revolver Modified."

In the "safe use" category, a plus was awarded if the notice informed the user not to use the firearm until the recall was completed, or told the user what measures to take while awaiting further instructions. A minus was awarded if no such language appeared in the ad.

Although the information cost of this element of communication is low, in only eighteen of the twenty-four notices surveyed was the user instructed to refrain from using the firearm until the recall was completed.

**6.Offer To Reimburse.** In order to create conditions wherein users take maximum advantage of the retrofit, a manufacturer must communicate that he is trying to minimize or reduce the owner's inconvenience.

Recalls that require the consumer to take action must make every effort to minimize the time, cost, and inconvenience required. Recalls requiring postage, packaging (materials not necessarily available at home), and a trip to the post office will suffer. Furthermore, recalls which ask consumers to return the product to the manufacturer may be reluctant to do

so if they perceive the product is necessary or valuable.<sup>14</sup>

One disturbing finding in the warnings literature is that even modest inconvenience can have significant effects on responses to safety information.<sup>15</sup> Studies have shown an in-home repair, instead of a remedy that required consumers to return the product to the manufacturer or retailer, could be expected to add an average of fourteen percentage points to the effectiveness rate of a recall.<sup>16</sup> A study on automobile recalls found consumer response highly dependent on the barriers to response.<sup>17</sup>

For recalls involving the need to return the gun to the manufacturer, minimizing inconvenience involves reimbursement for mailing and shipping costs incurred in remitting the firearm. In each of their three recalls from 1987 to 1990, Browning offered to reimburse the owner for shipping costs. No Colt ads contained offers of reimbursement for any of their three recalls. In four Ruger notices, (all of which involved potential accidental discharge defects), Ruger never offered to reimburse for shipping costs. Likewise, none of the three Smith & Wesson recalls mentioned expense reimbursement.

Some manufacturers such as Weatherby and Howa Machinery mentioned “work will be done at no charge”, but said nothing about expense reimbursement.

In the “offer to reimburse” category, a point was awarded if the manufacturer offered to reimburse the user for all expenses incurred in shipping the gun to be

recalled. A point was deducted if the manufacturer failed to reimburse expenses, or provided incomplete information. Two programs rated “NA” were self-retrofits; therefore the rating is not applicable.

The manufacturer explicitly mentioned shipping costs would be reimbursed in four of the twenty-four notices reviewed.

**7. Toll-Free Number.** With few exceptions, firearms manufacturers after the mid-1980’s consistently offered toll-free numbers for owners to call if they had any questions about the retrofit or recall program. None of the three Ruger pre-1985 retrofit notices contained a toll-free number; a 1987 Ruger retrofit was the first time Ruger furnished one.

In the “toll free” category, a point was awarded if the manufacturer provided a toll free number (or in some cases urged owners to call collect) if the owner had questions about the recall program. A point was deducted if such an option was not provided.

In nineteen of twenty-four notices, a toll-free number is offered to assist users. Those companies that lacked toll-free numbers encouraged customers to call them collect if they had questions about the program

**8. Financial Incentive to Participate.** A recent trend in the product recall field is the use of financial incentives to encourage participation. Incentives are most commonly offered for products involving significant hazard potential where owners may be hard to locate or persuade to act.<sup>18</sup> For example,

Bernzomatic Corp. offered owners fifty dollars to return portable gas heater units for a potential carbon monoxide hazard, and General Electric offered coffeemaker owners ten dollars to return units for an overheating hazard.<sup>19</sup> With one exception, firearms manufacturers have not made use of incentives in their recall programs.

Over the last two years, Howa Machinery and Weatherby have asked those who “have sold, traded, or given away an affected rifle” to forward the safety notice to the current owner. As stated earlier, the manufacturer may reduce the recall’s effectiveness by asking the user to undertake a task that may be time-consuming and inconvenient. Studies of consumer behavior reveal even modest inconvenience can have significant effects on responses to safety information.<sup>20</sup> If firearms manufacturers expect users to take the time and energy to locate the current owner and forward a recall notice, an incentive should be offered.

Only one manufacturer earned a point for offering an incentive. Smith & Wesson, in its 1991 recall notice for 9 and 10mm and .45 caliber pistols offered a free ultrasonic cleaning and full lubrication (\$25.00 value) to participants.

**9. Recall Information on Manufacturer’s Website.** A website is a low cost way to reach millions of potential users and is increasingly being used as a tool in recall programs.<sup>21</sup> Weatherby and Howa Machinery specifically mention websites as a source of recall information in their 2001 and 2002 recalls. Sometimes a user may have heard about the recall by word of mouth and may not have seen a notice meant to reach them. A website is an excellent

mechanism to reach this class of users. Because firearms have a long useful life and are frequently sold, traded, or given away, we examined whether a company’s current website mentions or provides safety information on the advertised recall.

While all eleven firearms manufacturers have web sites, in only three instances did we find information about the recalled firearm on the web site. Manufacturer web sites typically contain information about general gun safety and safe practices, yet rarely mention recalled products. In addition to Weatherby and Howa Machinery, the only instance where we could find safety information about a recall was on Ruger’s website. The website contained a recall notice for the “Blackhawk Single Six” manufactured from 1953 to 1972 and first recalled in the 1980’s. Similar to the notice some twenty years earlier, the web notice blamed the user for “failing to take the basic safety precaution of keeping the hammer down on an empty chamber.” It curiously referred to the recall as a Factory Safety Conversion, and had the user pay shipping costs to the factory. While Ruger should be commended for being the only manufacturer to post recall information on its website for a nearly twenty year old recall program, the notice communicated little safety information, blamed the user, did not offer a toll-free phone number and required the user to bear the costs of shipping the firearm to the factory.

Only three of twenty-four manufacturers earned points for having recall information on their websites.

**Conclusion.** In general, as Exhibit 2 indicates, the firearms industry’s recall/retrofit notices over the past twenty years earn mixed reviews for notification quality.

With one exception, manufacturers used strong alert words to inform users of the product hazard and the need for recall.

However, using strong alert words that get the user’s attention is only one part of the recall program. Attention and action are the cornerstones of an effective program. A recall must also be “user-friendly” and encourage the user to return the firearm. The manufacturer must galvanize users into action (and limit the potential for injury) by instructing users to refrain from use and making participation as easy as possible. Minimizing inconvenience and accurately stating the nature of the hazard are critical factors that impact whether a consumer will respond to the notice.

While no manufacturer earned a perfect score in the ratings, it is surprising how pervasive the failure to incorporate basic “user-friendly” program elements was. Only thirteen notification programs earned positive scores, i.e., scores for which there were more positive recall characteristics than negative ones.

Manufacturers in a number of cases blamed the user for the gun’s defects, never warned to refrain from use, minimized the hazard, were unclear about expense reimbursement and made it difficult to reach the manufacturer for additional information. These characteristics of their recall notices undermine the effectiveness of the notice,

decrease the likelihood of participation and thus make the recall less effective.

Firearms manufacturers should devote more attention to making the recall program “user-friendly” by taking steps that eliminate the above-mentioned unnecessary barriers to participation. In addition, the nature of the product – long life, potential multiple owners and high severity – make incentives potentially appropriate tools to improve recall effectiveness.

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<sup>1</sup> U.S. Consumer Product Safety Commission, *Recall Handbook: A Guide for Manufacturers, Importers, Distributors and Retailers on Reporting Under Section 15 of the Consumer Product Safety Act and Preparing For, Initiating and Implementing Product Safety Recalls* (1999).

<sup>2</sup> *Recall Effectiveness Research: A Review and Summary of the Literature on Consumer Motivation and Behavior*, CPSC Order No. CPSC-F-02-1391, prepared by XL Associates and Heiden Associates (2003). See generally Latin, H. “Good” Warnings, Bad Products and Cognitive Limitations, 41 U.C.L.A. Law. Rev., 1193- 1295 (1994).

<sup>3</sup> Friedman, Keyla, *The Effect of Adding Symbols to Written Warning Labels on User Behavior and Recall*, Human Factors 1988, Vol.30(4):507-515. See also Lehto, M. and Miller, J., *The Effectiveness of Warning Labels*, 11 J. Prod. Liab. 225-270 (1988).

<sup>4</sup> Braun, C. and Shaver, Eric.F., *Warning Sign Components and Hazard Perceptions*, Proceedings of the Human Factors and Ergonomics Society 43<sup>rd</sup> Annual Meeting, 1999.

<sup>5</sup> See Gooden, R., *Product Liability Prevention: A Strategic Guide* (2000) and also Wogalter, Michael S.; Conzola, Vincent C.; and Smith-Jackson, Tonya L., *Research-based Guidelines for Warning Design and Evaluation*, Applied Ergonomics Vol. 33:219-230 (2002).

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<sup>6</sup> Wogalter, Michael S. and Sojourner, Russell J., *Comprehension and Retention of Safety Pictorials*. Ergonomics, Vol. 40(5): 531-542 (1997).

<sup>7</sup> Regulated Products Handbook, United States Consumer Product Safety Commission, 2<sup>nd</sup> ed. (1994). See also United States Consumer Product Safety Commission, "Recall Checklist" (Jan.2001).

<sup>8</sup> Otubso, Shirley M, *A Behavioral Study of Warning Labels for Consumer Products: Perceived Dangers and Use of Pictographs*. Proceedings of the Human Factors Society, 32<sup>nd</sup> Annual Meeting (1988) p.536-40

<sup>9</sup> Booher, H., *Relative Comprehensibility of Pictorial Information and Printed Words in Proceduralized Instructions*, Human Factors Vol. 17(3): 266-277 (1975).

<sup>10</sup> Gooden, R., *Product Liability Prevention: A Strategic Guide* (2000) p. 188-190.

<sup>11</sup> United States Consumer Product Safety Commission., "Recall Checklist" (Jan.2001).

<sup>12</sup> Wogalter, Michael S., Young, Stephen L., Brelsford, John W.; and Barlow, Todd, *The Relative Contributions of Injury Severity and Likelihood Information on Hazard-Risk Judgments and Warning Compliance*, Journal of Safety Research, Fall 1999, Vol. 30(3): 151-162.

<sup>13</sup> See Fischhoff, B., *Cognitive Liabilities and Products Liability*, 1 J. Prod. Liab.207-212 (1977).

<sup>14</sup> Warner, Harland W., *Recall Effectiveness and the Communications Clutter*, Public Relations Quarterly, Fall 1980, p.21-24. See also Fischhoff, Baruch and Merz, Jon F., *The Inconvenient Public: Behavioral Research Approaches To Reducing Product Liability Risks in Product Liability and Innovation: Managing Risk In An Uncertain Environment* (1994).

<sup>15</sup> United States Consumer Product Safety Commission *Recall Effectiveness Study* (May 1978) and *Report of The Recall Effectiveness Task Force* (August 1980).

<sup>16</sup> Murphy, R. Dennis and Rubin, Paul H, *Determinants of Recall Success Rates*, Journal of Products Liability Vol.11: 17 -28 (1988).

<sup>17</sup> Heisler, J.T. and Bernstein, A. (Market Facts), *Study To Determine Why Vehicle Owners Respond To Or Ignore Recall Notifications*, prepared for NHTSA, July 1980, DOT HS-805-591.

<sup>18</sup> The Product Recall Planning Guide, 2<sup>nd</sup> edition, ASQ Quality Press (1999).

<sup>19</sup> News From CPSC: "*Bernzomatic TX-900 A Heater Recall – 50\$ Refund Offered*" Release 87-053,

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Sep.1987 and "*General Electric Intensifies Recalls of Coffeemakers That May Pose a Fire Hazard: Seeks Higher Regional Returns*" Release 92-050, Feb. 1992.

<sup>20</sup> See United States Consumer Product Safety Commission *Recall Effectiveness Study* (May 1978) and *Report of The Recall Effectiveness Task Force* (August 1980). See also *Recall Effectiveness Research: A Review and Summary of the Literature on Consumer Motivation and Behavior*, CPSC Order No. CPSC-F-02-1391, prepared by XL Associates and Heiden Associates (2003).

<sup>21</sup> United States Consumer Product Safety Commission, "Recall Checklist" (Jan. 2001).

## EXHIBIT I

### ANALYSIS OF FIREARM RECALLS 1982 - 2002

MODEL	MANUFACTURER	DATE	ALERT WORDS	PICTORIAL	RARITY OF EVENT	USER BLAMED	SAFE USE	EXPENSE REIMB.	TOLL FREE	INCENTIVE	INFO ON WEBSITE
Over and Under Shotguns	Browning	1987	PRODUCT WARNING AND RECALL NOTICE	Yes		Accidental discharge possible "following a sequence of rather unnatural manipulations of the hammer"		Yes	Yes	No	No
A-500 Semi-Automatic Shotgun	Browning	1988	PRODUCT WARNING AND RECALL NOTICE	Yes		No	DO NOT LOAD UNTIL NEW TRIGGER INSTALLED	Yes	Yes	No	No
22 Magnum Rimfire Bolt Rifle	A-Browning	1990	PRODUCT WARNING AND RECALL NOTICE	No		No	DO NOT LOAD OR SHOOT YOUR 22 MAGNUM RIMFIRE BOLT RIFLE	Yes-prepaid or reimbursed	Yes	No	No
25 ACP Auto Pistol	Colt	1984	READ THIS MESSAGE IF YOU OWN THIS GUN	Yes		Yes-"susceptible to accidental discharge if improperly carried with a round in the chamber, and dropped or otherwise carelessly handled."	Carry your pistol only with an empty chamber	No	No	No	No
380 Semi-Autos	Colt	1988	PRODUCT SAFETY WARNING TO ALL OWNERS OF COLT 380 SEMI-AUTOS	Yes		No	"We urge that you do not use your Colt 380 auto until you make this change."	Not Applicable- Self retrofit	Yes	No	No
All Amer Double Action Pistols	Colt	1995	PRODUCT SAFETY WARNING AND RECALL NOTICE	Yes		Always control your pistol so as to prevent its being dropped or struck a blow, especially with a round in the chamber.	Carry this pistol only with the chamber empty; never chamber a round until immediately before your are ready to fire.	Unknown	Yes	No	No
Model 1500,1550, 1700LS Series Rifles	Howa Machinery	2002	IMPORTANT SAFETY NOTICE	Yes		No	STOP USING YOUR RIFLE IMMEDIATELY	"all work will be done at no charge."	Yes	No	Yes
Bolt Action Rifles	Remington	1988	Important Notice to Recent Buyers of Remington Bolt Action Rifles	No	"Although it is unlikely...the rifle could fire."	No	Do Not Load It	Unknown	Yes	No	No
KP-100 Pistols	Remington	1989	IMPORTANT NOTICE TO RECENT BUYERS OF REMINGTON MODEL XP-100 PISTOLS	No	"Although it is unlikely...the rifle could fire."	No	Do Not Load It	Unknown	Yes	No	No

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### ANALYSIS OF FIREARM RECALLS 1982 - 2002

MODEL	MANUFACTURER	DATE	ALERT WORDS	PICTORIAL	RARITY OF EVENT	USER BLAMED	SAFE USE	EXPENSE REIMB.	TOLL FREE	INCENTIVE	INFO ON WEBSITE
.17 Caliber Bolt Action Rifle	Remington	1990	Important Warning to Owners of Remington .17 Rem. Caliber bolt Action Rifles	No		No	DO NOT LOAD IT	No	Yes	No	No
Blackhawk/ Single Six Revolver	Ruger	1984	Do you own a RUGER Blackhawk or Single Six revolver like this? If so, Ruger wants to give you and install FREE a unique new improvement	Yes		Yes-will "help prevent accidental discharges caused by a blow to the hammer if the user has failed to take the basic safety precaution of keeping an empty chamber under the hammer"	No	No	No	No	Yes
M-77 Bolt Action Rifles	Ruger	1985	Notice to Owners of Ruger M-77 Bolt Action Rifles	Yes	"in extreme cases..rifle can fire unexpectedly"	No	Do not use your M-77 rifle until you have received and installed the replacement screw	Not Applicable- Self retrofit	No	No	No
Mark II .22 Caliber Pistol	Ruger	1985	NOTICE TO ALL OWNERS OF RUGER MARK II .22 CALIBER PISTOLS	Yes		"Always keep the muzzle pointed in a safe direction regardless of the position of the safety, and never rely on any mechanical safety device to justify careless handling of any firearm."	Do Not Use The Pistol	No	No	No	No
P-85 9mm Pistols	Ruger	1991	IMPORTANT SAFETY WARNING TO OWNERS OF RUGER P-85 9MM PISTOLS	No	1 report in 200,000 guns shipped/ "rare event"	No, but ad states "ALWAYS KEEP THE PISTOL POINTED IN SAFE DIRECTION"	No, warns ALWAYS KEEP PISTOL POINTED IN SAFE DIRECTION	No	Yes	No	No
9mm Semiautomatic pistols	Smith & Wesson	1986	PRODUCT WARNING AND RECALL	No		No	No	No	Yes	No	No
L-Frame .357 Magnum Revolver	Smith & Wesson	1987	PRODUCT WARNING	No		No	DO NOT USE .357 AMMUNITION WITH REVOLVER UNTIL YOU HAVE HAD THE REVOLVER MODIFIED	No	Yes	No	No
Pistols with Frame Mounted Levers	Smith & Wesson	1991	PRODUCT ADVISORY	Yes		No	No	No	Yes	Yes- CLEANING/ LUBRICATION (\$25 VALUE)	No

## EXHIBIT I

### ANALYSIS OF FIREARM RECALLS 1982 - 2002

MODEL	MANUFACTURER	DATE	ALERT WORDS	PICTORIAL	RARITY OF EVENT	USER BLAMED	SAFE USE	EXPENSE REIMB.	TOLL FREE	INCENTIVE	INFO ON WEBSITE
M14, M1, Beretta B-59 Rifle	Springfield Armory	1988	PRODUCT WARNING AND RECALL NOTICE	Yes		No	No	No	Yes	No	No
Bolt Action Rifles	Steyr-Mannlicher	1996	IMPORTANT WARNING TO OWNERS OF STEYR-MANNLICHER BOLT-ACTION RIFLES	No		Improper maintenance may increase the risk	DO NOT LOAD, FIRE OR OTHERWISE USE THE RIFLE	Yes	Yes	No	No
Llama XI 9mm Semi-Auto Pistols	Stoeger Industries	1984	WARNING AND NOTICE OF RECALL	No		No	TAKE NOTICE THAT THE PISTOL IS DANGEROUS AND SHOULD NOT BE USED UNTIL THE CONDITION IS CORRECTED	"At no expense"	No	No	NO
Llama XI-B and IX-A Pistols	Stoeger Industries	1992	PRODUCT WARNING AND RECALL NOTICE	No		No		Yes-reimburse	Yes	No	No
Vanguard Rifle	Weatherby	2001	IMPORTANT SAFETY NOTICE	No		No	STOP USING YOUR RIFLE IMMEDIATELY	"work will be done at factory at no charge."	Yes	No	Yes
Model 100 Rifles or Carbines	Winchester	1990	PRODUCT SAFETY WARNING...ATTENTION: OWNERS OF WINCHESTER MODEL 100 RIFLES OR CARBINES	No		No	"discontinue all use of the firearm and make it imoperable by removing the firing pin."	Awaiting program developments	Yes	No	No
Model 100 Rifles or Carbines	Winchester	1991	PRODUCT SAFETY WARNING AND REPLACEMENT NOTICE...ATTENTION: OWNERS OF WINCHESTER MODEL 100 RIFLES OR CARBINES PLEASE READ THIS NOTICE	No		No	WARNING: DO NOT SHOOT MODEL 100 RIFLE	No	Yes	No	No

**EXHIBIT II**  
**RATINGS OF FIREARM MANUFACTURER RECALLS**  
**INVOLVING ACCIDENTAL DISCHARGE HAZARDS 1982-2002**

<b>MANUFACTURER</b>	<b>MODEL</b>	<b>YEAR</b>	<b>ALERT WORDS</b>	<b>PICTORIAL</b>	<b>RARITY</b>	<b>BLAME</b>	<b>SAFE USE</b>
BROWNING	OVR & UNDER SHOTGUN	1987	+	+	+	-	-
BROWNING	A-500 SEMI AUTO	1988	+	+	+	+	+
BROWNING	RIMFIRE A-BOLT RIFLE	1990	+	-	+	+	+
COLT	25 ACP AUTO PISTOL	1984	+	+	+	-	+
COLT	380 SEMI-AUTO PISTOL	1988	+	+	+	+	+
COLT	ALL-AMER. DOUB ACTION	1995	+	+	+	+	+
HOWA MACHINERY	1500-1700 RIFLE	2002	+	-	-	+	+
REMINGTON	BOLT ACTION RIFLE	1988	+	-	-	+	+
REMINGTON	XP-100 PISTOL	1989	+	-	-	+	+
REMINGTON	BOLT ACTION RIFLE	1990	+	-	+	+	+
RUGER	BLACKHAWK/SINGLE SIX	1984	-	+	-	-	-
RUGER	M-77 BOLT ACTION RIFLE	1985	+	+	-	+	+

**EXHIBIT II**  
**RATINGS OF FIREARM MANUFACTURER RECALLS**  
**INVOLVING ACCIDENTAL DISCHARGE HAZARDS 1982-2002**

MANUFACTURER	MODEL	YEAR	ALERT WORDS	PICTORIAL	RARITY	BLAME	SAFE USE
RUGER	MARK II .22 PISTOL	1985	+	+	+	-	+
RUGER	P-85 9mm PISTOL	1991	+	-	-	-	-
SMITH & WESSON	9mm SEMI-AUTO PISTOL	1986	+	-	+	+	-
SMITH & WESSON	.357 PISTOL	1987	+	-	+	+	+
SMITH & WESSON	PISTOLS W/LEVERS	1991	+	+	+	+	-
SPRINGFIELD ARM	M1, M14 BERETTA RIFLE	1988	+	+	+	-	+
STEYR-MANNLICH	BOLT ACTION RIFLE	1996	+	-	-	-	+
STOEGER INDUST	LLAMA XI 9mm PISTOLS	1984	+	-	+	+	+
STOEGER INDUST	LLAMA XI-B, IX-A PISTOLS	1992	+	-	+	+	-
WEATHERBY	VANGUARD RIFLE	2001	+	-	-	+	+
WINCHESTER	MODEL 100 RIFLES	1990	+	-	+	+	+
WINCHESTER	MODEL 100 RIFLES	1991	+	-	+	+	+

**EXHIBIT II**  
**RATINGS OF FIREARM MANUFACTURER RECALLS**  
**INVOLVING ACCIDENTAL DISCHARGE HAZARDS 1982-2002**

MANUFACTURER	MODEL	YEAR	REIMBURSE	TOLL FREE #	INCENTIVE	WEB	TOTAL POINTS
BROWNING	OVR & UNDER SHOTGUN	1987	+	+	-	-	1
BROWNING	A-500 SEMI AUTO	1988	+	+	-	-	5
BROWNING	RIMFIRE A-BOLT RIFLE	1990	+	+	-	-	3
COLT	25 ACP AUTO PISTOL	1984	-	-	-	-	-1
COLT	380 SEMI-AUTO PISTOL	1988	NA	+	-	-	4
COLT	ALL-AMER. DOUB ACTION	1995	-	+	-	-	3
HOWA MACHINERY	1500-1700 RIFLE	2002	-	+	-	+	1
REMINGTON	BOLT ACTION RIFLE	1988	-	+	-	-	-1
REMINGTON	XP-100 PISTOL	1989	-	+	-	-	-1
REMINGTON	BOLT ACTION RIFLE	1990	-	+	-	-	1
RUGER	BLACKHAWK/SINGLE SIX	1984	-	-	-	+	-5
RUGER	M-77 BOLT ACTION RIFLE	1985	NA	-	-	-	0

**EXHIBIT II**  
**RATINGS OF FIREARM MANUFACTURER RECALLS**  
**INVOLVING ACCIDENTAL DISCHARGE HAZARDS 1982-2002**

MANUFACTURER	MODEL	YEAR	REIMBURSE	TOLL FREE #	INCENTIVE	WEB	TOTAL POINTS
RUGER	MARK II .22 PISTOL	1985	-	-	-	-	-1
RUGER	P-85 9mm PISTOL	1991	-	+	-	-	-5
SMITH & WESSON	9mm SEMI-AUTO PISTOL	1986	-	+	-	-	-1
SMITH & WESSON	.357 PISTOL	1987	-	+	-	-	1
SMITH & WESSON	PISTOLS W/LEVERS	1991	-	+	+	-	3
SPRINGFIELD ARM	M1, M14 BERETTA RIFLE	1988	-	+	-	-	1
STEYR-MANNLICH	BOLT ACTION RIFLE	1996	+	+	-	-	-1
STOEGER INDUST	LLAMA XI 9mm PISTOLS	1984	-	-	-	-	-1
STOEGER INDUST	LLAMA XI-B, IX-A PISTOLS	1992	-	+	-	-	-1
WEATHERBY	VANGUARD RIFLE	2001	-	+	-	+	1
WINCHESTER	MODEL 100 RIFLES	1990	-	+	-	-	1
WINCHESTER	MODEL 100 RIFLES	1991	-	+	-	-	1