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November 19, 2012

Ms. Inez Tenenbaum
Chairman
U.S. Consumer Product Safety Commission
4330 East West Highway, Room 820
Bethesda, MD 20814

Re: Proposed Rulemaking on Safety Standard for Magnet Sets, CPSC-2012-0050

Dear Chairman Tenenbaum:

We write in favor of the rulemaking to prohibit the sale of rare earth magnet sets that are responsible for serious injuries to the gastrointestinal systems of children. Based on our 14-year experience with dangers involving children ingesting small objects, Safe Kids believes this prohibition is required because of severe health consequences when children swallow the magnets, both in terms of the number of incidents and the severity of the potential injuries, as well as the absence of an alternative way to prevent child injury. Unintentional and preventable injury is the number one killer of children aged 19 and under in the United States. The severe injuries sustained by children from the magnet sets are all preventable. We must prevent these injuries, and we can. Safe Kids Worldwide is joined in this letter by 62 coalitions across the nation, most of which are connected with pediatric and medical institutions. It includes the support of the Safe Kids coalition for the District of Columbia which is linked with our parent organization: the Children's National Medical Center.

Safe Kids notes that the seller of the most popular rare earth magnet sets decided to discontinue the sale of its products, while still selling its existing inventory. However, the danger is still presented by the tiny and powerful magnets and the Consumer Product Safety Commission is using good judgment in pursuing the rulemaking.

The 2mm magnets—with the look and size of silver balls one would use on a birthday cake—have 15 times the power of a traditional magnet. When swallowed in multiples, they present a clear, present and unique danger to children as evidenced by the number of cases reported by the CPSC and in a recently released study by the North American Society for Pediatric Gastroenterology, Hepatology and Nutrition. We also considered the severity of the case histories like those presented below. For the sake of kids' safety, it is important, after its careful consideration of the risk, that the CPSC approve this rulemaking to halt the sale of rare earth magnet sets now and in the future.

Introduction to Safe Kids Worldwide.

Safe Kids Worldwide is a global network of organizations dedicated to providing

parents and caregivers with practical and proven resources to protect kids from unintentional injuries. Throughout the world, almost one million children die of from injury each year, and every one of these tragedies is preventable. Safe Kids works with an extensive network of more than 600 coalitions in the U.S. and in 23 countries to reduce traffic injuries, drownings, falls, burns, poisonings and more. Since 1988, Safe Kids has helped reduce the U.S. childhood death rate from unintentional injury by 53 percent. But injuries that are unintentional and preventable remain the number one killer of children aged 19 and under.

Safe Kids Has a Unique Capacity to Identify and Confirm Trends and Emerging Risks.

90 of the Safe Kids coalitions are connected with children's hospitals and trauma centers, and this provides our organization with the capacity to learn about severe cases of childhood injury and emergent trends in real time. We can also alert our network to a potential trend by immediately alerting coalitions. The rare earth magnets risk is one of those developments.

Experience with the Ingestion of Small Objects.

Safe Kids also has extensive experience with the ingestion of small objects that can pose a threat to a child. The danger of small toys or parts of toys has been a decades-long hazard and challenge. More recently, "button batteries," the small batteries that power hearing aids, small toys, remote controls, car key fobs and the like, have prompted considerable action on the part of Safe Kids in terms of education, awareness and advocacy. In the majority of cases when a child swallows a button battery, it is eliminated in the stool. If, however, it remains with its negative pole in contact with tissue fluids in the lining of the esophagus, a microcurrent can generate hydroxide. That causes internal alkaline burns and perforations of the esophagus in less than two hours.¹ The medical implications of swallowing button batteries and several rare earth magnets are different, but equally severe.

Safe Kids ran an extensive education program involving button batteries.² The ingestion of small objects, so common in young and curious children, was explained well in the "Pediatrics for Parents" blog: "Young children put just about anything and everything into their mouths. If it's small, there's a good chance the child will end up swallowing it. Medically called 'foreign body ingestion,' this activity is most common among children six months to three years old. According to the Centers for Disease Control and Prevention (CDC), in 2003, children under 20 years old swallowed over 110,000 objects."³

Safe Kids can speak with authority in supporting the statements in the Commission's rulemaking statement relating to how the magnets have qualities that can "surprise and amuse" a young child, as well as how the powerful characteristics of the magnets are "likely to seem magical" to a child. We agree with the following statement in the proposed rulemaking, that, "Mouthing and ingestion of non-food items is a normal part of the exploratory behavior of preschool children."

In addition to Safe Kids' experience with kids swallowing small items, it is also important to consider expert opinion on the difference between the 2mm magnets swallowed in multiples and other items kids find interesting for mouth exploration. The association of

pediatric gastroenterologists, the North American Society for Pediatric Gastroenterology, Hepatology and Nutrition (“NASPGHAN”), has stated that coins, marbles and even thumbtacks will, in most cases, pass through the gastrointestinal system without incident. The high-powered magnets do not easily pass through the system. That’s because they become attracted to each other in the gastrointestinal tract. They pull delicate tissue together, causing blockages and perforations, which require invasive surgery. The public statement went further, saying that, “When two or more swallowed magnets are in different parts of the intestinal tract they still retain a powerful attraction for each other, coming together and pinching the intestinal walls that separate them, potentially causing bowel ulceration, perforations in the intestine, and severe injury.”⁴

The Buckyball Swallowing Risk.

Rare Earth Magnets.

The small and powerful magnets have been in the marketplace for about two decades. The magnets are made of Neodymium-Iron-Boron and they are 15 times stronger than traditional magnets. They were included in children’s construction toys and several of the toys were recalled because the magnets detached and were ingested by children. The CPSC tracked at least one death and multiple cases requiring intestinal surgery. To deal with this risk *involving toys* CPSC worked with the industry on a voluntary standard relating to the inclusion of such magnets in toys. That standard is now mandatory. It applied only to toys as defined in regulation partly based on age (14 and under). It did not apply to something merely called a toy. When Buckyballs, the product name for the most popular rare earth magnet set product, first hit the market in 2008, they were marketed as an adult “desk toy” with the feature of relieving stress.⁵

It is ironic that a product marketed as a stress reliever can cause so much stress.

Network of Coalitions IDs Danger of Rare Earth Magnets.

Safe Kids was aware of the danger posed by the powerful magnets. The organization was alerted to an incident arising from the ingestion of magnets of a Mississippi two-year-old who was undergoing surgery and treatment at the New Orleans Children’s Hospital, the home of the Safe Kids New Orleans. ⁶

The Braylon Jordan Case.

Two-year-old Braylon Jordan swallowed eight magnets and spent two months in the New Orleans Children’s Hospital’s ICU. Much of his small intestine had to be removed. As of August 2012, Braylon could not eat anything through his mouth and was taking nourishment through a tunnel catheter in his chest. He has to wear an ostomy bag day and night that collects his waste. He’s had six surgeries during the two months he was in intensive care, was sedated completely for three weeks and developed an infection in his bloodstream. Dr. Adam Noel of the Louisiana State University Health Sciences Center, a GI, was one of Braylon’s surgeons. He explained the danger this way: “The compression of your tissue between the two magnets will cause a hole, and if that hole occurs, we call that a perforation, and this can be a very serious complication.”⁷ At some point, Braylon will require an intestinal transplant which is extremely perilous—maybe one of the most

dangerous kinds of transplants—because the infection risk is so high, Dr. Noel observed.⁸ Prompted by the New Orleans case, the CPSC and Safe Kids issued a joint statement warning parents about the mega magnets.⁹

The Payton Bushnell Case.

Payton Bushnell was a year older than Braylon in March 2012 when she swallowed 37 Buckyball rare earth magnets. From an early x-ray, doctors thought the Portland, Oregon girl had swallowed a bracelet.¹⁰ A second x-ray showed the ring-like object in her abdomen and she was taken to the ER. Payton's surgeon Dr. Sanjay Krishnaswami at Randall Children's Hospital, said, "We had to cut her open and remove each magnet individually without tearing her stomach or intestines. If they had stayed in there a few more days, she could have sustained serious damage."¹¹

Older Children Mimicking Piercings.

Older children connect the magnets to their tongues or nose to simulate a nose or tongue piercing, and when ingested, have caused significant injury. This aspect of the rare earth magnet risk is important, too. Ten-year-old Meredith DelPrete of Fairfax, Virginia, mimicked a piercing and her treatment involved 10 x-rays, three CT scans and an endoscopy. In another case, a 13-year-old swallowed five magnets to copycat a lip piercing. While Meredith survived her case with relatively minor surgery, doctors tried other less-intrusive procedures but eventually had to perform surgery to remove magnets in three places in her intestines. She was left with a four-inch scar after two weeks in the hospital.¹²

Safe Kids Worldwide Is In Favor Of The Rare Earth Magnet Rulemaking For The Following Reasons.

Is There a Risk?

The 2mm magnets, when swallowed in multiples, exhibit a clear, present and unique danger to children as evidenced by the numbers of cases reported by the CPSC and the severity of the case histories like those presented above. For the sake of kids' safety, it is important, after careful consideration of the risk, alternative cures, and utility of the product that the CPSC approve this rulemaking to halt the sale of magnet sets.

Is it an Unreasonable Risk?

The risk presented by the rare earth magnet sets is significant in terms of the intensity of the damage they cause to a child's gastrointestinal system as well as the number of incidents that have been reported.

Intense Damage to Pediatric Gastro-Intestinal Systems.

We defer to the expertise of pediatricians and their professional associations, the American Academy of Pediatrics ("AAP") and NASPHAGAN, on the impact of the ingestion of rare earth magnets. AAP has stated the following about the danger of magnet ingestions:

Recent anecdotal reports have shown that magnet ingestions have led to dozens of surgeries, bowel perforations or fistulas, endoscopies, bowel resections, and other

serious gastrointestinal injuries as a result of young children swallowing magnets and adolescents unintentionally swallowing them after using magnets as a fake tongue piercing. Ingested magnets can stick together and trap and compress portions of the bowel wall between them, potentially leading to perforation, ischemia, sepsis, and bowel obstructions.¹³

Once the agency filed its administrative lawsuit, the President of AAP, Robert Block, told CBS News:

As pediatricians, our number one goal is to keep children safe. The powerful, tiny magnets contained in these toys and other similar products have caused unnecessary surgeries, debilitating injuries, irreversible gastrointestinal damage and other lifelong health impacts in infants, children and adolescents.¹⁴

There Is A Significant Number of Cases to Warrant Decisive Action.

Data collection of cases involving children harmed by the ingestion of the magnets continues. However, the available statistics cited in the CPSC notice is compelling: An estimated 1,700 ingestions of magnets led to the treatment of kids in emergency rooms from January 1, 2009 through December 31, 2011, an average 2.3 cases each day. In addition, the American College of Surgeons reports that 10 to 20 percent of the ingestions required surgery.¹⁵

The North American Society for Pediatric Gastroenterology, Hepatology, and Nutrition (NASPGHAN) released the results of a survey of its members in which 354 of its 1,747 members responded. They said that there were 480 cases of magnet ingestion over the past ten years, and 204 in the last year alone.¹⁶

Treatment of Magnet Ingestion Patients is Harsh

In addition to the numbers of cases, the treatment for ingestion can be severe. The NASPGHAN survey showed that 79% of patients who had swallowed a high-powered magnet required either an endoscopy, surgery, or both (52% endoscopy alone, 21% endoscopy and surgery, and 6% surgery alone).¹⁷ Of those requiring surgery, 62% were perforation or fistula repairs and 16% were bowel resections.¹⁸ Maxfield & Overton, the company that makes Buckyballs, says that it has confirmed only 12 swallowing incidents.¹⁹ The longer-term consequences are severe, as well. Remember the case of Braylon Jordan who lost most of his small intestine and will require a challenging intestinal transplant.

The medical consequences, especially involving small children, are another reason why rare earth metal products should be recalled.

No Matter the Number of Cases, the Seriousness of the Injuries Warrant Decisive Action.

Notwithstanding the estimate of 1,700 of ingestions leading to ER visits over two years and the results of the NASPGHAN study, Maxfield & Overton argues that the number of cases is small. "The rate of incident for Buckyballs, compared to so many other products--

such as fireworks and balloons--is astoundingly low," said Craig Zucker, the creator and CEO of Buckyballs.²⁰

By comparison, in 2000, 1,700 children ages 14 and under experienced symptoms serious enough to require medical treatment from carbon monoxide poisoning.²¹ Safe Kids, firefighters and governmental agencies considered this the kind of significant risk requiring a strong response.²²

There are other injuries and deaths in which the number of incidents is small, but Safe Kids believes it is vital that strong, effective action be taken. One example involves hyperthermia in children left alone in cars. When the temperature is warm, an automobile can heat up by 20 degrees in the first ten minutes. Among hyperthermia fatalities, in more than half the time, caregivers are distracted and forget that there is a child in the car. Kids succumb to heat because their bodies heat up 3 to 5 times faster than an adult's. Deaths from heat stroke range from a low of 29 to a high of 49 children per year from 2003 to 2010. The number of near misses is unknown. Safe Kids worked with the National Highway Traffic Safety Administration, the Department of Health and Human Services and other agencies and group to hold an all-out national education campaign. The numbers may be relatively small, but the manner of death is horrific for the child, and for a parent acting negligently, a horrific way to survive.

The damage a few rare earth magnets can cause to a child's intestines is similarly compelling, and requires vigorous action.

Is There a Cure That Would Be Effective Short of an Involuntary Recall?

A general principle in regulating commercial activities is that government should take the least intrusive steps that are effective. This is embraced in the Regulatory Flexibility Act,²³ which requires agencies to engage in an extra degree of due diligence when a small business will be impacted. We are convinced the agency met the requirements of the Act and principle.

This would not be a hard case if warning labels, packaging changes and/or the reengineering of the product were possible. Safe Kids is convinced that, at this point in time, there is no effective option that would be less intrusive to commercial interests. In fact, Dr. Robert Noel, MD, a pediatric gastroenterologist and lead author of the NASPGHAN's survey said, "Despite improved warnings, the prevalence of high-powered magnet ingestions is increasing, which tells us that warnings are ineffective at preventing ingestions. The most effective way to prevent ingestions is to ban the sale of high-powered magnets."²⁴

Voluntary Recall.

In fact, involuntary recalls are extremely rare, not only by the CPSC but other federal governmental agencies with which Safe Kids has had experience such as the Food and Drug Administration and the National Highway Traffic Safety Administration. In fact, the rare earth magnet administrative lawsuit was instituted eleven years after the last one filed involving BB Guns.

Most of the time, government works with industry to effect a voluntary recall, and this was the case involving eleven of the thirteen companies selling the magnet sets in the U.S. who agreed to recall their products.²⁵ Maxfield & Overton and Zen Magnets, a Canadian company, would not. On October 31, 2012, the company announced that it was discontinuing the sale of new Buckyball and Buckycube magnet sets, and that it would sell off its remaining inventory. The company said it would still challenge the CPSC's actions.²⁶

Repackaging.

Could the manufacturer have reengineered the package to make it more difficult for kids to gain access and swallow them? The answer is no. Once the "stress relief" magnet product is removed from its plastic package, they are subject to a child gaining access to them or, despite their power, for some magnets to disengage, fall on the floor and become available to a child's curious hands and mouth.

Warning Labels.

It is fair to state that the Commission and Maxfield & Overton worked together on enhanced warnings and a Buckyballs safety website. Safe Kids purchased a set of Buckyballs on bustedtees.com for \$35. In a three-paragraph description, the third paragraph is the following warning:

Warning: Keep Away From All Children! Do not put in nose or mouth. Swallowed magnets can stick to intestines causing serious injury or death. Seek **immediate medical attention** if magnets are swallowed or inhaled."

There's a link from "immediate medical attention" to the Buckyballs safety site.²⁷ On the packaging there are three two-inch by one-inch warnings that say:

"Keep Away From All Children! Do not put in nose or mouth. Swallowed magnets can stick to intestines causing serious injury or death. Seek immediate medical attention if magnets are swallowed or inhaled."



In larger type above one of the warnings, it says "Unlimited Fun!" and then in smaller type "(for grown-ups)". Maxfield & Overton began to use these warnings in May 2010.²⁸

Despite the heightened warning and awareness activities, kids who had ingested the magnets continued being seen in ERs. The warnings and public awareness campaigns were not working.

It would be difficult to place a warning label on the "naked" set of magnets or a 2mm magnet.

Safe Kids does not dismiss the effectiveness of warning labels to instruct parents on the importance of keeping the magnet sets away from their children. But the magnets are

unique because of their size: so hard to see individually, easily separable from the set and then impossible to recognize when a 216 magnet set no longer consists of 216 magnets. Robert E. Kramer, M.D., associate professor of pediatrics and director of endoscopy at Children's Hospital Colorado, where 15 patients have been treated after swallowing the magnets, said, "Even when parents are aware of the risks of these products, keeping them out of the reach of young children is difficult. With hundreds of tiny balls in one set, a few may drop on the floor or in furniture, and you wouldn't even realize they're missing."²⁹

Voluntary Action is the Norm.

As stated earlier, in the vast majority of cases, industry and government work together to keep a product on the market and at the same time, protect consumers from unreasonable risks, especially involving kids. Unintentional serious injury is the leading killer of kids 19 and under, and consumer products are an important part of that equation.

The case of the button batteries is instructive. The battery industry has been innovative in introducing new packaging that will make it more difficult for kids to gain access to the batteries. Energizer introduced new child-resistant packages with additional warnings. Research is ongoing on coating the batteries as much as possible to slow down the internal burning process and research is even looking into developing chemicals to indicate that a child has swallowed a button battery. We also note that there is another distinction between the magnets and the button battery cases: The utility of the products casts stark differences. Batteries provide energy for important products such as hearing aids. The magnet sets, in the most favorable light, are a way for adults to relieve stress or, alternatively, they are what they were first marketed as, an "adult toy."

Recalls of Toys Are Not Extraordinary, An Industry's Failure to Cooperate When Child Injury is at Stake is Unusual.

Maxfield & Overton makes it seem as if it is out of the ordinary to recall items like Buckyballs, which the company first marketed as a toy. This is not the case at all. The Consumer Product Safety Commission has been engaged in inspecting toys for years. Toys that are small have received routine scrutiny. The difference is that toy manufacturers are responsible when the safety of their product is questioned. Toys are recalled, but they are *voluntary recalls*, reached with the involvement of the seller or manufacturer, such as the following:

- 14-inch Baby Dolls were voluntarily recalled because the fingers and toes could detach, causing a choking hazard.³⁰
- With Health Canada joining, Colorful Hearts Teddy Bears were voluntarily recalled, because the bear's eyes could loosen and fall out, causing a choking hazard. There were 284,000 Colorful Hearts products in the U.S.
- A children's stacking toy was voluntarily recalled because foam material inside posing a choking hazard.³¹
- A children's play theater, weighing 46 pounds, was voluntarily recalled as a tip-over hazard.³²

Conclusion.

Products made of tiny and powerful magnets present a clear and present danger to children. Having experimented with warnings, enhanced warnings, on-line education content and other means, the agency has made the case that there is no effective remedy other than taking this product off of the market. Maxfield & Overton have not been singled out in this action. Nine companies which also produced products with the rare earth metals followed the usual procedure and agreed to a recall. The rule involving products made up of the magnets is necessary to prevent their future use which would endanger children. Based on the foregoing, Safe Kids Worldwide and 62 coalitions from across the nation strongly support this rulemaking and urges that the agency continues its efforts to keep rare earth magnet sets out of the flow of commerce.

Sincerely,

Kate Carr
President and CEO

These Safe Kids Coalitions join in supporting this public comment:

Safe Kids District of Columbia: Children's National Medical Center

Safe Kids Alaska: Providence Alaska Medical Center

Safe Kids Massachusetts: Boston Children's Hospital

Safe Kids Colorado: The Children's Hospital

Safe Kids Illinois: Children's Memorial Hospital

Safe Kids Wisconsin: Children's Hospital of Wisconsin

Safe Kids Rhode Island: Injury Prevention Center at the Rhode Island Hospital

Safe Kids Kansas: KS Department of Health & Environment

Safe Kids Vermont: Fletcher Allen Health Care Trauma Services Injury Prevention

Safe Kids Kentucky: Kentucky Department of Health

Safe Kids South Fulton County (GA): Fulton County Department of Health & Wellness

Safe Kids Los Angeles West: Children's Hospital Los Angeles

Safe Kids of Otsego County (New York State): Bassett Healthcare

Safe Kids Chicago: Children's Hospital of Chicago

Safe Kids Barren/Hart/Metcalf Coalition (Kentucky): Barren River District Health
Department

Safe Kids Greater Grand Rapids, MI: Helen DeVos Children's Hospital

Safe Kids East Central (Augusta GA): Georgia Health Sciences Health System

Safe Kids Denver Metro: The Children's Hospital

Safe Kids Lee/Collier (Florida): Golisano Children's Hospital of Southwest Florida

Safe Kids Summit County (Ohio): Akron Children's Hospital
Safe Kids Huron Valley (Michigan): C.S. Mott Children's Hospital
Safe Kids Athens (Georgia): Athens Regional Medical Center
Safe Kids Southeast Wisconsin: Children's Health Education Center
Safe Kids Grand Forks: Altru Health System
Safe Kids Sonoma County: Santa Rosa Memorial Hospital & Regional Trauma Center
Safe Kids Cumberland Valley (Tennessee): Monroe Carell Jr. Children's Hospital at Vanderbilt
Safe Kids Colorado Springs (Colorado): Memorial Hospital University of Colorado Health
Quad Cities Safe Kids (Illinois): Genesis-Illini Medical Center
Safe Kids Gainesville/Hall County (Georgia): Northeast Georgia Medical Center
Safe Kids Tarrant County (Texas): Cook Children's Health Care System
Safe Kids Fargo/Moorhead (ND); Sanford Health
Safe Kids Austin (Texas): Dell Children's Medical Center
Safe Kids El Paso (Texas): University Medical Center of El Paso
Safe Kids Volusia/Flagler (Florida): Healthy Communities
Safe Kids Allegheny County: Children's Hospital of Pittsburgh of UPMC
Safe Kids Delaware: Division of Public Health
Safe Kids Sarpy/Cass County (Nebraska): Department of Health and Wellness
Safe Kids Erie (Pennsylvania): Erie County Health Department
Pottawatomie County Safe Kids (Kansas): Pottawatomie County Health Department
Safe Kids Fayette County (Kentucky): Kentucky Children's Hospital
Safe Kids Southeastern Pennsylvania: Children's Hospital of Philadelphia
Safe Kids Magic Valley (Idaho): St. Luke's Magic Valley Medical Center
Safe Kids Upstate New York: Upstate Golisano Children's Hospital
Safe Kids Lincoln-Lancaster County: Lincoln-Lancaster County Health Department
Safe Kids Macon County (Illinois): Macon County Health Department
Safe Kids Winnebago County (Illinois): Swedish American Hospital
Safe Kids Platte (Nebraska): Good Samaritan Hospital
Safe Kids Florida: Florida Department of Health
Safe Kids Connecticut: Connecticut Children's Medical Center
Safe Kids New Hampshire: Children's Hospital at Dartmouth
Safe Kids South Carolina: Children's Trust of South Carolina
Safe Kids Lakeshore Holland (Michigan): Life Services Parent Center
Safe Kids North Carolina: North Carolina Department of Insurance
Safe Kids Palm Beach County (Florida): Community Partnership Group
Safe Kids Wilkes County (North Carolina): County of Wilkes Fire Marshal's Office
Safe Kids Edwards, Wayne and White Counties: Hope Center (Illinois)
Safe Kids Washoe County (Nevada): REMSA

Safe Kids Thurston County (Washington State): Child Care Action Council
Safe Kids California: The Child Abuse Prevention Center
Safe Kids Prince George's County: Prince George's County Fire/EMS Department
Safe Kids Pennsylvania: The Center For Schools and Communities
Safe Kids Central Shenandoah Valley (Virginia): Harrisonburg Fire and Rescue

SOURCES.

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² "Button batteries are dangerous to kids, especially toddlers, and cause severe injuries when swallowed," Safe Kids website, available at <http://www.safekids.org/safety-basics/safety-spotlight/battery-safety/>, last accessed 10.08.2012.

³ "You Swallowed What?" Pediatrics for Parents, available at <http://www.pedsforparents.com/articles/3093.shtml>, last accessed 10.10.2012. Oluyinka Olutoye, a pediatric surgeon at the Texas Children's Hospital: "Kids swallow things all the time. Most of the time, objects that are small enough to get into the stomach will pass through without causing any problem. But this type of material is made to absorb water, and over time it keeps growing and growing and gets to a size where it can't get through the digestive tract." Dr. Olutoye was discussing both a gel ball called a "Water Balz" which expands up to 400 times when it contacts water. Water Balz, about an inch in diameter when not inflated by water, are another product in which the manufacturer says is not meant for small children. Water Balz may become another problematic product. Anahad O'Connor, "Expanding Ball Toy Poses Hazard to Children and Pets," the *New York Times*, 09.17.2012, available at <http://well.blogs.nytimes.com/2012/09/17/expanding-ball-toy-poses-hazard-to-children-and-pets/>, last accessed 10.08.2012

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