



**Austrialpin USA Inc.**  
**5726 West Wautoma Beach Rd.**  
**Hilton, NY, USA 14468**  
**1.866.962.7008**

January 5, 2012

Mr. Octavio Cazares, RN  
Director of Research and Development  
CC: Mr. Brian Cavolt, CEO  
JBC CORP  
552 Central Drive, #113  
Virginia Beach, VA 23454

RE: Concerns per Raptor Buckles as promoted and sold by JBC Corp

Dear Sirs,

It has been eight months since we first communicated with you by open letter<sup>§</sup>. In that correspondence we addressed numerous issues with regards to the Raptor Buckle which you represent. Specifically, our concerns were with regards to its overall safety, your bogus comparisons to our Cobra™ product, and your false, dangerous, and/or consumer misleading product marketing claims. To date, we have not received the courtesy of a response from your firm with respect to any of our concerns. Furthermore, we have not noted any amendments to your actions, promotions, or product in anyway so as to address the issues which we laid forth in our first correspondence. As these concerns are very serious in nature, we again request your response.

Please find a copy of our original letter (with additional pertinent updates added in parenthesis) attached as appendix below. We look forward to receiving your earliest reply and resolution of all matters applicable.

Sincerely,

Aaron Hemphill, President  
AustriAlpin USA Inc.

§ Dated May 9, 2011.



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May 9, 2011

Mr. Octavio Cazares, Registered Nurse  
Director of Research and Development  
CC: Mr. Brian Cavolt, CEO  
JBC CORP  
552 Central Drive, #113  
Virginia Beach, VA 23454

Dear Sirs,

It has come to our attention that JBC Corp has been marketing a quick release buckle under the Raptor trade name. It is our view that some of your promotional materials contain a number of false or misleading statements concerning the buckle. Some of these representations relate to the safety, security and reliability of the buckle that, from a review of your own 3<sup>rd</sup> party test results, are not supportable. As you are aware, AustriAlpin is the manufacturer of the Cobra (TM) quick release buckle system, the widely accepted industry benchmark for load bearing quick release buckles. While we welcome fair competition and all 'legitimate' safety product manufacturers to the market, we have several concerns regarding your products and statements thereto, which we wish to address. These statements are contained in the form of promotional literature attached as Appendix 1.

Admittedly, we understand that neither yourselves, nor your firm have any history, quantifiable experience, or expertise in the PPE (Personal Protective Equipment) or Safety Hardware Industry. However, this does not excuse you from the dissemination of negligent or uninformed information with relation to safety standards, claims of security or reliability, and/or strength. Inherently, people's lives are in the balance, and as such, you have a moral obligation to ensure the truth and accuracy of your statements and representations. As respected leaders in the safety hardware market for well over 30 years, AustriAlpin presents the following concerns which we would ask you to address.

**Issue #1:** Statements: "Unsurpassed Security" and subsequently, "We are the safest side release buckles available".

While companies are allowed a certain latitude in promoting their products, these statements are unsupportable and unless substantiated by solid evidence, are misleading to the general public. To our knowledge your product has no usage beta, is not produced under any recognized industry quality control standards, and is completely devoid of any quantifiable,

testimonial or anecdotal supporting performance evidence. Furthermore, a very simplistic inspection of the buckle hardware reveals numerous inferiorities and potentially unsafe features, a few of which follow: (a) The unfinished, sharp edges on your stamped male ends and adjuster contraption pose an extreme risk of damaged or severed webbings when placed under high load. We note that your own 3rd party tests isolated this design issue by fixing (bar tacking) the webbing so it could not move through the adjuster; (b) Inconsistent, and excessive plate gapping in your stamped and then riveted parts poses a major long term problem as traps for foreign obstructing materials thereby compromising the release mechanisms effectiveness or reliability when in theatre; (c) High profile rivets afford unnecessary target for strike trauma which could render the locking mechanism defective or dangerous; *[Update: It has been ascertained via market feedback and physical sample inspection that a high proportion of your buckles have faulty rivets. Specifically, the rivets are not properly fixed and as such they travel up and down within the pilot holes. This is dangerous as it will facilitate rapid aluminum vs steel wear and fatigue of the rivet and/or pilot hole thus making failure of the entire buckle closure possible. In a human life / safety application this would be nothing short of catastrophic.]* (d) Small and sharp release clips are difficult to actuate and pose problems for a gloved, cold environment, and repetitive use applications. With all this taken into consideration, we do not understand how you can substantiate your absurd claims and request that you provide us with your support for these statements. When claiming to be the “best” or “unsurpassed”, you must necessarily compare your product to all your competitors’ products, including AustriAlpin’s Cobra™ quick release buckle which has been in production for 15+ years, functions at the highest extremes, is produced under the most rigorous (and certifiable) quality standards and is manufactured by respected experts in the safety hardware industry. We are most eager to understand the basis of your boasting.

**Issue #2:** Statement: “Raptor fasteners will not open while under load”.

Our position is this: Contrary to your assertions, your product can open when under load. While the very small size of your release clips makes this more difficult to effect than other designs, it is still possible and therefore it is not a fool-proof design as you advertise. It is our understanding that the Raptor design is derived from the Asian made “Presto buckle” (distributed by Ace Metal Products – the sister company of your manufacturer, ADF) and it is our experience that knockoff buckles patterned from these Asian designs can open when under load. This “leverage flaw” in your buckle would be further accentuated with the introduction of larger release clips. For the sake of the public’s safety, we would encourage you to either refine your design to make it a safer product or cease from this misrepresentation.

**Issue #3:** Statement: Minimum Breaking Strengths (MBS)

This representation is also seriously misleading. According to your own 3<sup>rd</sup> party test reports, the figures you promote (without further qualification) are for loop (ie: harness) configurations. They are not for a frame test configuration as stipulated by most standards organizations. As such, the true static MBS of your products are half (50%) what you have identified. We would ask you to revise your statement so as not to mislead consumers as to the true capacities of your product.

**Issue #4:** Statement: that all Raptor products “meet and exceed ANSI Z359.1-2007....standards”

Again, a quick study of the actual ANSI Z359.1-2007 standards (which we are happy to provide you if you like) would reveal that the requirement for this elusive and stringent benchmark is 18kN - in a frame / straight pull configuration. Per your own 3<sup>rd</sup> Party tests reports, we note that NONE of your products are anywhere near the realm of this threshold. In fact, your strongest buckle is 1445 lb (6.42kN) below this strength parameter and your weakest buckle is a gross 2260 lb (10kN) deficient. Adding to these written misrepresentations is the fact that your product image (per your marketing flyer) depicts the buckle as having markings which identify the ANSI Z359.1 standard. This constitutes another misrepresentation that can have life threatening consequences to consumers who rely on them.

**Issue #5:** Statement that your 3<sup>rd</sup> party testing certifies “the highest degree of reliability”.

This is misleading. Simply put, 3<sup>rd</sup> Party test houses DO NOT offer any certification or statement of reliability. They supply (at cost) a single declaration of fact with regards to a select sampling of products tested under specific criteria – the static maximum breaking strength, in your instance. They do not attest to the reliability, safety, quality, or overall performance of a product population. To suggest that your 3<sup>rd</sup> party testing guarantees this sort of assurance is completely erroneous. If you are indeed interested in such qualitative product assurances you should contact the appropriate Standards organizations and consider investing in their applicable certifications. Furthermore, it is extremely alarming to note that the methodology employed by your 3<sup>rd</sup> Party Test House (John A. Bachelor) utilized only 1 sample of each of your buckle products. If reliability was truly your concern, a population sample of 20 or more pieces would have been tested in order to provide a more reliable gauge of performance with some measure (Sigma 3) of Standard Deviation. For all anyone knows, a second sample may have failed at half the strengths you are promoting. Additionally, for the record, your products were not tested for dynamic strength as you have stated. If this was the case, the webbings would not have been fixed in the adjuster and the buckle would have been subjected to a “drop” load test. They were not and this is evident from your own reports.

**Issue #6:** Claim that your product design is “US Patented”

Extensive research conducted by our office has not identified any such patent for your Raptor buckle design. Admittedly, our inability to find your PCT filings does not constitute proof that such IP may or may not exist. It is interesting to note however that your products are embossed as, “Patent Pending” whilst your literature states, “US Patented”. In light of your confusion on the matter we ask that you provide us with your US patent or patent application number and ensure your promotional materials reflect the current status of your patent, if any.

**Issue #7:** Misinformation with regards to the certification of AustriAlpin Cobra buckles

Finally, it has come to our attention that one or more of your sales representatives have been representing that AustriAlpin Cobra products are not 3<sup>rd</sup> Party tested. This is false. As a leading and responsible PPE company, all of our products are 3<sup>rd</sup> Party tested (using multiple population samples). Furthermore, all our products are produced and certified under the most stringent, ISO governed Total Quality Management System (PSASV § 15 and § 16). We are

not aware of any other products in the market which exceed AustriAlpin's quality or commitment to quality control. We therefore ask that you desist from further maligning comments. *[Update: It has also been documented that you are falsely promoting your product as being stronger, lighter, and smaller than our Cobra buckles. To quote your posting on the ITS Tactical Forum website, "The RAPTOR is slightly wider but thinner in profile and lighter in weight than the Cobra while offering the same or better performance characteristics." Let the facts state that your comments are dishonest and false. If either you or your clients wish to review the facts of the matter in side by side comparative fashion we would suggest you download the files from the following online link: [www.austrialpin.net/products/cobra/competition.asp](http://www.austrialpin.net/products/cobra/competition.asp) Considering the aforementioned, we ask that you contact the ITS Tactical Forum Editor and correct your statements.]*

This completes our list of current concerns. We look forward to your timely response and the implementation of corrective action where appropriate. We reserve the right to pursue legal recourse in the event you should fail to address these negligent and/or deceptive trade practices in a timely and appropriate manner.

Sincerely,



Aaron Hemphill, Director  
AustriAlpin USA Inc.