



United States  
**CONSUMER PRODUCT SAFETY COMMISSION**  
Washington, D.C. 20207

Alberta

6/6  
05/17/99

**MEMORANDUM**

**DATE:** 3/17/99

**TO :** ES  
**Through:** Sadye E. Dunn, Secretary, OS  
**FROM :** Martha A. Kosh, OS  
**SUBJECT:** Sleepwear Revocation

ATTACHED ARE COMMENTS ON THE CF99-1

<u>COMMENT</u>	<u>DATE</u>	<u>SIGNED BY</u>	<u>AFFILIATION</u>
CF99-1-1	2/1/99	Stephen Morris MD, FACS, Assoc. Professor of Surgery, Dir. Trauma Services	The University of Utah School of Medicine Department of Surgery 50 North Medical Dr. Salt Lake City, UT 84132
CF99-1-2	2/2/99	H. Obenshain	HC 75, Box 146-P New Creek, WV 26743
CF99-1-3	2/3/99	Kim Berggren, RN, BSN, Nurse Manager, Burn Unit	Dameron Hospital Assoc. Associated with Sutter Health 525 West Acacia St Stockton, CA 95203
CF99-1-4	2/4/99	Fred Allinson Chairman	National Volunteer Fire Council 1050 17 <sup>th</sup> St, NW, Suite 1212 Washington, DC 20036
CF99-1-5	2/4/99	Ernest Grant RN, MSN Outreach Nurse Clinician & Michael Peck, Director, NC Burn Center, Prof Of Surgery & Charles Hall Nurse Manager	North Carolina Jaycee Burn Center Univ. of NC Hospitals Chapel Hill, NC 27514  Address same as above  Address same as above

CF99-1-6	2/5/99	Patricia Taggart MBA, PT, Dir, Burn Ctr.	Children's Hospital Oakland 747 Fifty Second St. Oakland, CA 94609
CF99-1-7	2/5/99	Leonard Schwab Executive VP	Little Me P.O. Box 1742 Cumberland, MD 21501
CF99-1-8	2/9/99	David Herndon MD, Chief of Staff, Prof of Surgery, Jesse Jones Distinguishhd Chair in Burn Surgery University of Texas Medical Branch	Shriners Hospitals for Children Shriners Burns Hospital Galveston 815 Market St. Galveston, TX 77550
CF99-1-9	2/9/99	Warren Garner, MD, Director, Burn Center	Los Angeles County University of Southern California Medical Ctr. 1200 N State St Los Angeles, CA 90033
CF99-1-10	2/10/99	Mary Crossland RN, BSN Clinical Dir & Joseph Boykin Medical Dir & Yvonne Humphries Burn Specialist	Wound Healing Center 2621 Grove Avenue Richmond, VA 23220 Address same as above Address same as above
		Vicki Sommer, RN & Carolyn Hassan	Address same as above
CF99-1-11	2/10/99	Anne Brown	Fairfield Medical Center 401 N Ewing St Lancaster, OH 43130
CF99-1-12	2/15/99	Jay Yelon, DO Evans-Haynes Burn Center & Leslie Riddel, RN & Christine Turner RN & Deborah Graham	MCV Hospitals General Surgery Section Of Trauma/Critical Care/ Burn Surgery 1200 East Broad St P.O. Box 980454 Richmond, VA 23298

CF99-1-13	2/16/99	Mark Mandell President	Association of Trial Lawyers of America 1050 31 <sup>st</sup> St, NW Washington, DC 20007
CF99-1-14	2/17/99	R. Gillespie MD, Medical Director Burn Center	Nebraska Health System Clarkson Hospital University Hospital 4350 Dewey Ave Omaha, NE 68105
CF99-1-15	2/17/99	R. Gillespie, MD Chairman, Federal Issues Committee	American Burn Assoc. Surgical Specialties 4239 Farnam South Tower Doctors Bldg Suite 509 Omaha, NE 68131
CF99-1-16	2/19/99	J. Amesterdam Head, Emergency Medicine Dept. Univ. of MN & Lynn Solem, MD Burn Center Director	Regions Hospital Emergency Center 640 Jackson St St Paul, MN 55101 Address same as above
CF99-1-17	2/22/99	Deb Motz, RN Clinical Coordinator, & Larry Foster MD	Burn Trauma Unit St. Luke's Regional Medical Center 2720 Stone Park Blvd Sioux City, IA 51104
CF99-1-18	2/23/99	Ann M Ahee, RN Burn Research Pediatric General Surgery	The Detroit Medical Ctr Children's Hospital of Michigan 3901 Beaubien Blvd Detroit, MI 48201
CF99-1-19	2/24/99	G.P. Kealey, MD Director, Section of Trauma, Burns & Critical Care	The University of Iowa Hospitals & Clinics Department of Surgery Division of General Surgery 200 Hawkins Dr. Iowa City, IA 52242
CF99-1-20	2/22/99	S. Knizek Prevention Education Dir	Alisa Ann Ruch Burn Foundation 3600 Ocean View Blvd, #1 Glendale, CA 91208
CF99-1-21	2/25/99	Michelle Staggs Chief Flight Nurse & Trauma Registry Coordinator	Baptist MedFlight/Baptist Medical Center #18 Emeral Court Little Rock, AR 72212

CF99-1-22	2/26/99	Wendy Nivison Chairperson Government Affairs Committee	Maine Emergency Nurses Association 4 Waren Terrace Winslow, ME 04901
CF99-1-23	2/15/99	David Meaghee Burn Surgeon and 7 Colleagues on Burn Team	The Children's Hospital 1056 East 19 <sup>th</sup> Ave Denver, CO 80218
CF99-1-24	2/24/99 (e-mail)	Debra Reilly, Asst Professor Of Surgery	University of Southern California Dept. of Surgery, Div of Burn & Plastic Surgery
CF99-1-25	2/12/99 (e-mail)	David Gregg Brown Univ.	25 Memorial Road Providence, RI 02906
CF99-1-26	3/01/99	Mark Spicer Assistant Fire Marshal	County of Albermarle Fire & Rescue Admin. 401 McIntire Road Charlottesville, VA 22902
CF99-1-27	2/22/99	Donna Crane Director of Congressional Affairs	American Public Health Association 1015 Fifteenth St, NW Washington, DC 20005
CF99-1-28	3/4/99	C. Sninsky	International Assoc Of Fire Chiefs 4025 Fair Ridge Dr Fairfax, VA 22033
CF99-1-29	3/4/99	Linda Bindner RN, BA	Baum-Harmon Memorial Hospital 255 N. Welch Ave Primghar, IA 51245
CF99-1-30	3/4/99	David Voigt, MD Director of Burn Research	Saint Elizabeth Regional Medical Center 555 South 70 <sup>th</sup> St Lincoln, NE 68510
CF99-1-31	3/4/99	Members of Congress (48)	Congress of the United States Washington, DC 20515
CF99-1-32	3/5/99	Barbara Edwards	121 Brunswick Ave. Bloomsbury, NJ 08804
CF99-1-33	3/10/99 (e-mail)	Susan Francis	701 Palm Valley Dr East Harlingen, TX 78552

CF99-1-34	3/11/99 (e-mail)	Sue Elsesser	Oakland County Health Division 27725 Greenfield Rd Southfield, MI 48076
CF99-1-35	2/13/99 (e-mail)	Cindy Palmer	Moorhead, MN
CF99-1-36	2/25/99 (e-mail)	Karen Dionne	8137 E. Fremont Ave Englewood, CO 80112
CF99-1-37	3/1/99	Margaret Wright	138 Hillside Ave Shelton, CT 06484
CF99-1-38	3/1/99	Marjorie Bolack	376 Soundview Ave Stratford, Ct 06615
CF99-1-39	3/3/99	Marshall Grant	RR 1 Box 66 Garyburg, NC 27831
CF99-1-40	2/19/99	Richard Burgess Director of Public Relations	Shriners Burns Hopsital 51 Blossom St Boston, MA 02114
CF99-1-41	2/19/99	C. Fred Moulton (Shriners Hosp)	1754 State Road Plymouth, MA 02360
CF99-1-42	2/19/99	Elmer Maxwell (Shriners Hosp)	21A Sweetser St Wakefield, MA 01880
CF99-1-43	2/19/99	Donald Chalmera (Shriners Hosp)	10 Caltha Road Brighton, MA 02125
CF99-1-44	2/19/99	Charles Gerrard (Shriners Hosp)	44 Fiske St. Tewksbury, MA 01876
CF99-1-45	2/19/99	Linda Fringuelli (Shriners Hosp)	48 Blaney St Revere, MA 02150
CF99-1-46	2/19/99	Margaret Hoey (Shriners Hosp)	32 P St, South Boston, MA 02117
CF99-1-47	2/19/99	Thomas Campbell (Shriners Hosp)	91 Kenmere Rd Medford, MA 02155
CF99-1-48	2/19/99	M. Phillips (Shriners Hosp)	152 Clark St Newton, MA 02459
CF99-1-49	2/19/99	Sandra Mullen (Shriners Hosp)	1 Willis Rd Peabody, MA 01960
CF99-1-50	2/19/99	Linda Posata (Shriners Hosp)	73 Davis St. Malden, MA 02148

CF99-1-51	2/19/99	Norma Marotta (Shriners Hosp)	1609 State Rd Plymouth, MA 02360
CF99-1-52	2/19/99	N. Littlehale (Shriners Hosp)	10 Orange St Reading, MA 01867
CF99-1-53	2/19/99	Kelleigh Manlton (Shriners Hosp)	30 High View Rd Norwood, MA 02062
CF99-1-54	3/2/99	Melinda Bridges	13805 Lowry Dr Chanilly, VA 20151
CF99-1-55	3/4/99	Gale LaFountain	4700 Courthouse Rd Chesterfield, Va 23832
CF99-1-56	3/3/99	Rob Sheridan, MD Asst Chief of Staff	Shriners Hospitals for Children 51 Blossom St Boston, MA 02114
CF99-1-57	3/3/99	David Herdon MD, Chief of Staff	Shriners Hospitals for Children 815 Market St Galveston, TX 77550
CF99-1-58	3/5/99	J. Boatright RN, CEN Assoc Director	Priority Mobile Health P.O. Box 6379 New Orleans, LA 70174
CF99-1-59	3/5/99	J. Boatright RN, CEN President Elect	Louisiana Council of the Emergency Nurses Association
CF99-1-60	3/6/99	Keith O'Connor	7007 Barnacle Pl Burke, Va 22015
CF99-1-61	3/8/99	R. Greenwald	844 Holliday Lane Westminster, MD 21157
CF99-1-62	3/8/99	C. Snyder	Maryland Aviation Admin. 3 <sup>rd</sup> Floor, Terminal Bldg P.O. Box 8766 BWI Airport, MD 21240
CF99-1-63	3/4/99	Marilyn Lofflin RN, BSN Director of Patient Care Services	Orange City Hospitals & Clinic 400 Central Ave, NW Orange City, IA 51041
CF99-1-64	3/11/99	Andrew McGuire Exe. Director	Trauma Foundation San Francisco General Hospital San Francisco, CA 94110

CF99-1-65	3/12/99	David Riedel	6506 Harvest Mill Ct Centreville, VA 20121
CF99-1-66	3/15/99	Renee Stilwell	5435 Plymouth Meadows CT Fairfax, VA 22032
CF99-1-67	3/10/99	Margie Mayfield Texas Chairman	National Cotton Women's Committee 1918 North Parkway Memphis, TN 38112
CF99-1-68	3/8/99	James Hansen & Jess Hansen & Kendall Gardner	Vista Verde Farms, Inc Corcoran Airport P.O. Box 398 Corcoran, CA 93212
CF99-1-69	3/12/99	Gene Taubert	Valley CO-OP Oil Mill P.O. Box 533609 Harlingen, TX 78553
CF99-1-70	3/12/99	Bobby Crum	<b>Address same as above</b>
CF99-1-71	3/12/99	Hollis Sullivan	<b>Address same as above</b>
CF99-1-72	3/11/99	Kara Graafeiland	2816 8 <sup>th</sup> St Arlington, VA 22204
CF99-1-73	3/12/99	Kaye Ridings College Coordinator	Texas Food & Fibers Commission Apparel Research: Design And Marketing 1412 Ridge Rd Rockwall, TX 75087
CF99-1-74	3/12/99	Mark Abbott & Maxine Abbott & Jack Abbott & John Abbott & Mrs. John Abbott	Rt 2, Box 74 Harlingen, TX 78550
CF99-1-75		Maxine Abbott	Ladies for Cotton Rt 2, Box 75 Harlingen, TX 78550
CF99-1-76	3/12/99	Consumer	The Harlingen Gin Co Rt 2, Box 74 Harlingen, TX 78550
CF99-1-77	3/12/99	Consumer	D.L. Smith Farms Rt 2, Box 305 Harlingen, TX 78550

CF99-1-78	3/12/99	Consumer	National Cotton Women's Committee 1918 North Parkway Memphis, TN 38112
CF99-1-79	3/16/99	Keith Arnold Chairperson	Virginia Fire & Life Coalition VA Dept of Fire Programs 1704 Eastborn Dr Virginia Beach, VA 23454
CF99-1-80	3/14/99	Sandra Burns	1204 Shepherd Ave Laurinburg, NC 28352
CF99-1-81 Form letters In support of Sleepwear Revocation	3/3/99	Consumers (1,294)	
CF99-1-82	3/3/99	Edward Tagge, MD & H. Othersen, Jr MD & Jill Evans, RN, MSN & Andre' Hebra, MD	MUSC Children's Hospital Pediatric Surgery 165 Ashley Ave, Suite 633 CH P.O. Box 250916 Charleston, SC 29425
CF99-1-83 Form letters	3/10/99	Professional Staff at Shriners Hosp (75)	Shriners Hospitals for Children Burns Hospital Boston 51 Blossom St Boston, MA 02114
CF99-1-84	3/10/99	Terrell Price	10 Melody Lane Geneseo, NY 14454
CF99-1-85	3/10/99	Heather Paul Exe Director	National Safe Kids Campaign 1301 Pennsylvania Ave, NW, Suite 1000 Washington, DC 20004
CF99-1-86	3/6/99	John Slais & Nancy Slais	444 Curtis Ave Stratford, CT 06615
CF99-1-87	3/10/99	J. Hannebaum RN	Mercy Health Center 4300 West Memorial Rd Oklahoma City, OK 73120
CF99-1-88	3/15/99	Edith Weaver	Box 158 Petersburg, TX 79250

CF99-1-89	3/15/99	Virginia Boyd	Box 608 Petersburg, TX 75250
CF99-1-90	3/13/99	Flora Van Dyke	100 York St, Apt 14S New Haven, Ct 06511
CF99-1-91	3/3/99	Prof. Staff at Hollifield Station School (4)	Hollifield Station Elementary School 8701 Stonehouse Dr Ellicott City, MD 21043
CF99-1-92	3/3/99	Donna Garafalo Eg Mahan	853 Marco Place Venice, CA 90291
CF99-1-93	3/16/99	S.V. Ritter	22 Katie Lane New Haven, CT 06473
CF99-1-94	3/17/99	Mary Michos Chief	County of Prince William Dept of Fire & Rescue 1 County Complex Court Prince William, VA 22192
CF99-1-95	3/16/99	Shelley Michaels	15 Lindsley Pl Stratford, CT 06615
CF99-1-96	3/16/99	Dorothy Sommers	50 Fairlane Dr Shelton, CT 06484
CF99-1-97	3/16/99	Barbara Barry	33 Skyline Dr West Haven, CT 06516
CF99-1-98	3/17/99	Regis Dognin	342 Long Hill Ave Shelton, CT 06484
CF99-1-99	3/12/99	Gina Fitzgerald	27 Partridge Run Wallingford, CT 06492
CF99-1-100	3/15/99	Dorothy Sullivan	49 Ojibwa Rd Shelton, CT 06484
CF99-1-101	3/16/99	Tammy Fisher	2680 Birmingham Rd Maury City, TN 38050
CF99-1-102	3/16/99	Brenda Bushart	833 Riddick Rd Friendship, TN 38034
CF99-1-103	3/17/99	Buddy Adamson Director & Hollis Isbell Chairman	Alabama Farmers Federation P.O. Box 11000 Montgomery, AL 36191

CF99-1-104	3/18/99	Anthony O'Neill Vice President	National Fire Protection Association Executive Offices 1 Batterymarch Park P.O. Box 9101 Quincy, MA 02269
CF99-1-105	3/18/99	Prof. Staff At Mercy Medical Center (32)	St. John's Mercy Medical Center Burn Center 615 S New Ballas Rd St. Louis, MO 63141
CF99-1-106	3/19/99	James V Ryan	10817 Old Coach Rd Potomac, MD 20854
CF99-1-107	3/19/99	Stephen Austin Director of Governmental Relations	International Asso. Of Arson Investigators, Inc 300 South Broadway Suite 100 St. Louis, MO 63102
CF99-1-108	3/19/99	John Krichbaum Exe Director	American Burn Assoc. 625 N Michigan Ave Suite 1530 Chicago, IL 60611
CF99-1-109	3/22/99	T. Hendricks Robert O'Donnell Donna Griffin (3)	1053 Hancock Ave Bridgeport, CT 06605
CF99-1-110	3/22/99	Betsy Dettman RN, BSN, CEN ER Coordinator	Horn Memorial Hosp. 701 East Second St Ida Grove IA 51445
CF99-1-111	3/22/99	Catherine Wynne	Granparents Raising Grandchildren Support Group 94 Ft Hale Rd new Haven, CT 06512
CF99-1-112	3/22/99	Jeff Galdenzi	118 Green Knolls Lane Fairfield, CT 06430
CF99-1-113	3/22/99	R. Blumenthal Atty General Of CT (13)	Atty General of the States of AK, AZ, AK, CT, IL, IN, IA, NY, ND OK, RI, TN & WVA
CF99-1-114	3/22/99	Stephen Lamar Director Government Relations	American Apparel Manufacturers Assoc. 2500 Wilson Blvd Suite 301 Arlington, VA 22201

CF99-1-115	3/22/99	D. Weinberg Atty <b>On behalf of Impact Imports International</b>	Meeks & Sheppard Attorneys at Law 330 Madison Ave, 39 <sup>th</sup> Fl New York, NY 10017
CF99-1-116	3/22/99	Prof Staff American Assoc. For the Surgery Of Trauma, Eastern Assoc. For the Surgery of Trauma, American Burn Assoc, Orthopaedic Trauma Assoc, AO North America, Emergency Nurses Assoc, American Public Health Assoc	The Coalition For American Trauma Care Suite 200 11479 Waterview Reston, VA 22090
CF99-1-117	3/33/99	Mary Ruesch	59 Knorr Rd Monroe, CT 06468
CF99-1-118	3/33/99	Sid Long Exe Director	Southern Rolling Plains Cotton Growers Association Inc. 1574 Holiman Ln San Angelo, TX 76905
CF99-1-119	3/22/99	Sid Long Exe Director	Blackland Cotton & Grain Producers Assoc, Inc P.O. Drawer 738 Hillsboro, TX 76645
CF99-1-120	3/33/99	C. Mongillo	365 Mather St. Apt 22 Hamden, Ct 06514
CF99-1-121	3/22/99	Christine Clare	P.O. Box 583 Victorville, CA 92393
CF99-1-122	3/33/99	Dennis Beard	Howard Co. MD Depart. Of Fire & Rescue Services
CF99-1-123	3/33/99	Robert Andrews Member of Congress	U.S. House of Representatives Washington, Dc 20515
CF99-1-124	3/33/99	Members of the <b>Safe Children's Sleepwear Coalition</b> (16 org)	Safe Childrens Sleepwear Coalition Trauma Foundation San Francisco General Hospital San Francisco, CA 94110

CF99-1-125	3/22/99	Alfred Whitehead General President	International Assoc. of Fire Fighters 1750 New York Ave, NW Washington, DC 20006
CF99-1-126	3/22/99	Dennis Sargent Vice President	American Marketing Enterprises Inc. 10 West 33 <sup>rd</sup> St Suite 516 New York City, NY 10001
CF99-1-127	3/22/99	Robert Verdisco President	International Mass Retail Association 1700 North Moore St Suite 2250 Arlington, VA 22209
CF99-1-128	3/22/99	Curtis Stilwell Treasure ACBC Programs	Washington Regional Fire & Rescue Departments Aluminum Cans For Burned Children 4100 Chain Bridge Rd Fairfax, VA 22030
CF99-1-129	3/19/99	Kenneth Brown Director of Fire Services	County of Prince George P.O. Box 68 Prince George, VA 23875
CF99-1-130	3/22/99	Phillip Wakelyn Ph.D, Senior Scientist, Environmental Health & Safety	National Cotton Council of America 1521 New Hampshire Ave, N.W. Washington, DC 20036
CF99-1-131	3/22/99	Maria Leightley	Fairfax County Fire and Rescue Department Fairfax, VA
CF99-1-132	3/22/99	Bill Lockyer Atty General	State of California Department of Justice 300 South Spring St 5 <sup>th</sup> Floor, North Tower Los Angeles, CA 90013
(also see: CF99-1-113)			
CF99-1-133	3/22/99	Beth A. Littman Supervisor of Quality Assurance	KIDS 'R' US 461 From Rd Paramus, NJ 07652
(Restricted)			
CF99-1-134	3/33/99	Polly Clark	120 Bradford Place Kennett, MO 03857
CF99-1-135	3/22/99	James turner, III Secretary	Delaware Volunteer Firemen's Association 1461 Chestnut Grove Rd Dover, DE 19904

CF99-1-136	3/22/99	Ellen AcAlinden	8706 Melwood Rd Bethesda, MD 20817
CF99-1-137	3/23/99	Sarah Whitaker Director. Government Relations	National Retail Federation Liberty Place 325 7 <sup>th</sup> St, NW Suite 1000 Washington, DC 20004
CF99-1-138	3/22/99	Henry Borilla Member of Congress	Congress of the U.S. House of Representatives Washington, DC 20515
CF99-1-139	3/22/99	Merle Morrison SW Regional Director	P.O. Box 14 Lorenzo, TX 79343
CF99-1-140	3/22/99	Sharon Newell	Newell Forms, Inc. 5339 Papaya Circle Harlingen, TX 78552
CF99-1-141	3/33/99	Joan Balfour	7460 St. Pauls Rd Lumber Bridge, NC 28357
CF99-1-142	3/22/99	Jon Hardwick President	Louisiana Cotton Producers Association 3000 Kilpatric Blvd Suite 100 Monroe, IA 71201
CF99-1-143	3/22/99	Eva Lucas	Route 1, Box 70 Elmer, OK 73539
CF99-1-144	3/22/99	Sherry Wiesman	114 Nueces Park Harlingen, TX 78552
CF99-1-145	3/33/99	David Borowski	8624 Jane Lane Vienna, VA 22180
CF99-1-146	3/22/99	Jeff Meyer Fire Marshal	Columbus Fire Dept Fire Prevention Division 510 10 <sup>th</sup> St P.O. Box 1340 Columbus, GA 31902



CF 99-14

February 1, 1999

Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20207

re: Sleepwear Revocation

To Whom It May Concern:

I strongly support the proposed revocation by the Consumer Product Safety Commission (CPSC) of the relaxed flammability standards for children's sleepwear. This action would reinstate the previous, stricter CPSC standards for children's sleepwear flammability—standards that are needed to help prevent death and disfigurement for hundreds of our nation's infants and young children.

Burn injuries and deaths are preventable, and safe sleepwear for infants and young children is a critical part of any prevention initiative. In particular, infants younger than nine months are dependent on others to protect them from danger—they are generally incapable of removing themselves from the fire source if ignition should occur, and cannot "stop, drop, and roll" if clothing catches fire. Moreover, those infants that are mobile at this age are at risk of exposure to ignition sources. We must be diligent in ensuring that this extremely vulnerable group is adequately protected. Revocation of the relaxed flammability standards will help ensure this outcome.

The revocation of the relaxed flammability standard for snug-fitting sleepwear is just as important to our children's safety. While tight-fitting sleepwear is less likely to come in contact with a flame or other ignition source, the garment must be nearly skintight, and tight at the wrists, ankles, waist and other key points for it to be a "safer choice." Furthermore, parents often acquire such sleepwear—either by purchasing or through "hand-me-downs"—that is larger than the child currently wears. If the garment is purchased large, allowing room for a child to "grow into it," the purpose of tight-fitting sleepwear, from a burn safety perspective, has been defeated. It is also questionable whether tight fit will compensate for the increased dangers associated with a more flammable material such as cotton.

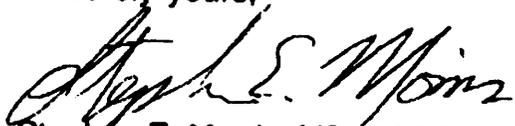
School of Medicine  
Department of Surgery  
Stephen E. Morris, M.D., F.A.C.S.  
Associate Professor  
50 North Medical Drive  
Salt Lake City, Utah 84143  
(801) 581-6255  
FAX (801) 585-2435

Office of the Secretary, CPSC  
re: Sleepwear Revocation  
February 1, 1999  
Page 2

Available injury and death data suggest that the more stringent flammability standards in effect prior to the September 1996 relaxation by the CPSC were clearly working. There have been fewer injuries or deaths involving ignition of children's sleepwear since enactment of the standard nearly 25 years ago. This low level of injuries and deaths can primarily be attributed to the more stringent, previously established flammability standards.

As a member of the burn team that must deal with the pain, suffering, and cost of burn injuries on a daily basis, I strongly support the proposed revocation of the relaxed flammability standards for children's sleepwear. It can make a difference in the prevention of death and disfigurement for our nation's children.

Sincerely yours,



Stephen E. Morris, MD, FACS  
Associate Professor of Surgery  
Director, Trauma Services  
Co-Director, Intermountain Burn Center

SEM/skr

CE 99-1-2

FEBRUARY 1, 1999

OFFICE OF THE SECRETARY  
CONSUMER PRODUCT SAFETY COMMISSION  
WASHINGTON, DC 20207

DEAR COMMISSIONERS:

IT HAS COME TO MY ATTENTION THAT THE FLAMMABILITY LAWS ARE IN QUESTION ONCE AGAIN. THIS TIME AFFECTING THE COTTON SLEEPWEAR OF INFANTS UP TO 9 MONTHS OLD. I AM STRONGLY OPPOSED TO ANY SUCH CHANGES AS IT DIRECTLY AFFECTS MY CHILD.

MY 7 MONTH OLD SON IS VERY SAFE AND COMFORTABLE IN HIS 100% COTTON SLEEPERS. I FEEL HE IS EXPOSED TO ENOUGH CHEMICALS AND SYNTHETIC PRODUCTS WITHOUT THE ADDED FLAME RETARDANT THAT WOULD HAVE TO BE ADDED TO HIS SLEEPWEAR TO MAKE IT COMPLY WITH THE FLAMMABILITY LAW.

IT IS A SAD FACT THAT CHILDREN, INFANTS AND TODDLERS DO DIE BECAUSE OF HOUSE FIRES. BUT THE FACT IS MOST DEATHS ARE CAUSED BY SMOKE INHALATION, NOT WHAT THEY ARE WEARING. AND SINCE HIS BLANKETS, SHEETS AND OTHER THINGS IN THE CRIB ARE NOT FLAME RETARDANT, I SEE NO REASON TO MAKE HIS SLEEPWEAR THAT WAY.

PLEASE RECONSIDER BEFORE ENACTING LEGISLATION THAT DENIES MY CHILD COMFORTABLE, BREATHABLE AND NATURAL SLEEPWEAR.

SINCERELY YOURS,



HELEN P. OBENSHAIN  
HC 75, BOX 146-P  
NEW CREEK, WV 26743



# DAMERON HOSPITAL ASSOCIATION

Associated with Sutter Health

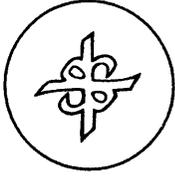
February 3, 1999

Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20207

Re: SLEEPWEAR REVOCATION

I strongly support the proposed revocation by the Consumer Product Safety Commission (CPSC) of the relaxed flammability standards for children's sleepwear. This action would reinstate the previous, stricter CPSC standards for children's sleepwear flammability...standards that are needed to help prevent death and disfigurement for hundreds of our nation's infants and young children.

1. Burn injuries and deaths are preventable, and safe sleepwear for infants and young children is a critical part of any prevention initiative. In particular, infants younger than nine months are dependent on others to protect them from danger---they are generally incapable of removing themselves from the fire source if ignition should occur, and cannot "stop, drop and roll" if clothing catches on fire. Moreover, those infants that are mobile at this age are at risk of exposure to ignition sources. We must be diligent in ensuring that this extremely vulnerable group is adequately protected. Revocation of the relaxed flammability standards will help ensure this outcome.
2. The revocation of the relaxed flammability standard for snug-fitting sleepwear is just as important to our children's safety. While tight-fitting sleepwear is less likely to come in contact with a flame or other ignition source, the garment must be nearly skintight, and tight at the wrists, ankles, waist and other key points for it to be a "safe choice." Furthermore, parents often acquire such sleepwear--either by purchasing or through "hand-me-downs"--that is larger than the child currently wears. If the garment is purchased large, allowing room for the child to grow into it, the purpose of tight-fitting, from a burn safety perspective, has been defeated. It is also questionable whether tight fit will compensate for the increased dangers associated with a more flammable material such as cotton.



# DAMERON HOSPITAL ASSOCIATION

Associated with Sutter Health

3. Available injury and death data suggest that the more stringent the flammability standards in effect prior to the September 1996 relaxation by the CPSC were clearly working. There have been fewer injuries or deaths involving ignition of children's sleepwear since enactment of the standard nearly twenty-five years ago. This low level of injuries and deaths can primarily be attributed to the more stringent, previously established flammability standards.

As a member of the health care profession,...a burn care provider for twenty-three years...who must deal with the pain, suffering and cost of burn injuries on a daily basis, I strongly support the revocation of the relaxed flammability standards for children's sleepwear. It can make a difference in the prevention of death and disfigurement for our nation's children.

Sincerely,  
*Kim Berggren* R.N., B.S.N.  
Kim Berggren R.N., B.S.N.  
Nurse Manager, Dameron Hospital Burn Unit  
Stockton, California

CF 99-1-4



**National Volunteer Fire Council**

1050 17th Street, NW, Suite 1212, Washington, DC 20036; 202/887-5700 phone; 202/887-5291 fax

February 4, 1999

Sadye E. Dunn  
Secretary  
Consumer Product Safety Commission  
Washington, D.C. 20207

Re: Sleepwear Revocation

Dear Ms. Dunn:

The National Volunteer Fire Council (NVFC) is a non-profit membership organization representing America's nearly one million volunteer fire, EMS, and rescue personnel. Organized in 1976, the NVFC serves as the voice for the volunteer fire service. I am writing to you today on behalf of the NVFC membership to urge the Consumer Product Safety Commission (CPSC) to revoke its 1996 amendments to the Flammable Fabrics Act and return to the stronger fire safety standards which kept children safe for more than 25 years.

One of the priorities of the NVFC is ensuring the safety and security of volunteer firefighters and the communities they protect. We believe that the 1996 amendments severely reduces the level of safety offered to families who purchase children's clothing covered by these amendments. The National Fire Protection Association estimates that there would have been ten times as many deaths and substantially more injuries associated with children's sleepwear if the original 1972 standard had not been implemented. Any change in that original standard increases the risk that a firefighter or a child will be injured as a result of a fire instigated by a sleepwear incident.

We realize that some proponents of the 1996 amendments have argued that there has been no increase in the number of burn injuries and deaths since the standard was changed. This is partially due to problems in the reporting of burn injuries. Furthermore, we do not believe that we should wait for children to be injured or killed before we return to a standard that worked for decades. These children deserve more protection, not less.

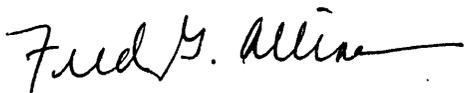
The NVFC believes that the standard that exempts "tight-fitting" sleepwear in children's sizes up to 14 is extremely dangerous. Most parents do not dress their children in "tight-fitting" clothing in an effort to extend the life of the clothing for a growing child. We also believe that the revised standard that exempts sleepwear for infants nine months and younger from fire safety regulations

is dangerous. Many infants at that age are crawling and are extremely vulnerable if exposed to a flame.

The NVFC has a long history of working with the CPSC on many issues. We recognize all that the CPSC has done to protect children's safety in the past and we look to you now to send the right message to America's families. Please do not wait until the number of children injured begins to rise before you protect them.

If you have any questions, please contact Anne Wilson, NVFC's Government Affairs Representative, at (202) 887-5700.

Sincerely,

A handwritten signature in black ink that reads "Fred G. Allinson". The signature is written in a cursive style with a long horizontal flourish at the end.

Fred G. Allinson  
Chairman

CY99-1-5



# NORTH CAROLINA JAYCEE BURN CENTER

OFFICE OF THE SECRETARY  
OF INFORMATION

February 4, 1999

1999 FEB 11 A 10:16

University of North Carolina Hospitals  
Chapel Hill, NC 27514  
(919) 966-3693 / 3571  
FAX: (919) 966-5732

*Director*

Michael D. Peck, M.D., Sc.D., F.A.C.S.  
Professor of Surgery

*Assistant Director*

Anthony A. Meyer, Ph.D., M.D., F.A.C.S.  
Professor of Surgery

*Burn Care Coordinator*

Anita Maready Fields, B.S.N.

*Chaplain*

Shirley M. Massey, B.A., M.Div.

*Clinical Research Nurse*

Ann Bonham, RN, MSN

*Dietician*

Yih Chang, M.S., R.D., C.N.S.D.

*Division Manager*

Kay Teague

*Nurse Manager*

Charles M. Hall, R.N., B.S.N.

*Occupational Therapy*

Sydney Thornton, O.T.R./L.

*Outreach Clinician*

Ernest J. Grant, R.N., M.S.N.

*Physical Therapy*

Krisin Kaupang, M.S., P.T.

*Recreational Therapy*

Jodi McKenzie, M.A., C.T.R.S.

*Rehabilitation Counselor*

Catherine T. Calvert, Ph.D., C.R.C.

*Social Worker*

Diane Priolo, C.C.S.W., A.C.S.W.

*Surgeon Assistant*

Marian E. Cranford, B.S., P.A.

Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20207

## RE: Sleepwear Revocation

I strongly support the proposed revocation by the Consumer Product Safety (CPSC) of the relaxed flammability standards for children's sleepwear. This action would reinstate the previous, stricter CPSC standards for children's sleepwear flammability – standards that are needed to help prevent death and disfigurement for hundreds of our nations infants and young children.

Burn injuries and deaths are preventable, and safe sleepwear for infants and young children is a critical part of any prevention initiative. In particular, infants younger than 9 months are dependent on others to protect them from danger – they are generally incapable of removing themselves from the fire source if inattention should occur, and cannot “stop, drop, and roll” if clothing catches fire. Moreover, those infants that are mobile at this age are at risk of exposure to ignition sources. We must be diligent in ensuring that this extremely vulnerable group is adequately protected. Revocation of the relaxed flammability standards will help ensure this outcome.

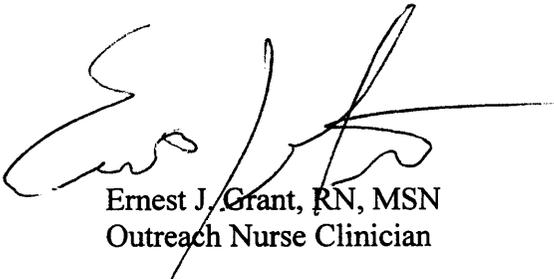
The revocation of the relaxed flammability standard for snug-fitting sleepwear is just as important to our children's safety. While tight-fitting sleepwear is less likely to come in contact with a flame or other ignition source, the garment must be nearly skintight, and tight at the wrists, ankles, waist and other key points for it to be a “safer choice.” Furthermore, parents often acquire such sleepwear – either by purchasing or through “hand-me downs” – that is larger than the child currently wears. If the garment is purchased larger, allowing room for a child to “grow into it,” the purpose of tight-fitting, from a burn safety perspective, has been defeated. It is also questionable whether tight fit will compensate for the increased dangers associated with a more flammable material such as cotton.

Available injury and death data suggest that the more stringent flammability standards in effect prior to the September 1996 relaxation by the CPSC were clearly working. There have been fewer injuries or deaths involving ignition of children's sleepwear since enactment of the standard nearly twenty-five years

Office of the Secretary  
Page 2  
February 4, 1999

As a member of the health care profession burn team, who must deal with the pain, suffering, and cost of burn injuries on a daily basis, I strongly support the proposed revocation of the relaxed flammability standards for children's sleepwear. It can make a difference in the prevention of death and disfigurement for our nation's children.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ernest J. Grant', with a long horizontal flourish extending to the right.

Ernest J. Grant, RN, MSN  
Outreach Nurse Clinician

CC: ABA

EJG/nsc



# NORTH CAROLINA JAYCEE BURN CENTER

OFFICE OF THE SECRETAR  
FREEDOM OF INFORMATION

February 4, 1999  
1999 FEB 16 A 10:42

*Director*  
Michael D. Peck, M.D., Sc.D., F.A.C.S.  
Professor of Surgery

*Assistant Director*  
Anthony A. Meyer, Ph.D., M.D., F.A.C.S.  
Professor of Surgery

*Burn Care Coordinator*  
Anita Maready Fields, B.S.N.

*Chaplain*  
Shirley M. Massey, B.A., M.Div.

*Clinical Research Nurse*  
Ann Bonham, RN, MSN

*Dietician*  
Yih Chang, M.S., R.D., C.N.S.D.

*Division Manager*  
Kay Teague

*Nurse Manager*  
Charles M. Hall, R.N., B.S.N.

*Occupational Therapy*  
Sydney Thornton, O.T.R./L.

*Outreach Clinician*  
Ernest J. Grant, R.N., M.S.N.

*Physical Therapy*  
Kristin Kaupang, M.S., P.T.

*Recreational Therapy*  
Jodi McKenzie, M.A., C.T.R.S.

*Rehabilitation Counselor*  
Catherine T. Calvert, Ph.D., C.R.C.

*Social Worker*  
Diane Priolo, C.C.S.W., A.C.S.W.

*Surgeon Assistant*  
Marian E. Cranford, B.S., P.A.

University of North Carolina Hospitals  
Chapel Hill, NC 27514  
(919) 966-3693 / 3571  
FAX: (919) 966-5732

Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20207

## RE: Sleepwear Revocation

I strongly support the proposed revocation by the Consumer Product Safety (CPSC) of the relaxed flammability standards for children's sleepwear. This action would reinstate the previous, stricter CPSC standards for children's sleepwear flammability – standards that are needed to help prevent death and disfigurement for hundreds of our nations infants and young children.

Burn injuries and deaths are preventable, and safe sleepwear for infants and young children is a critical part of any prevention initiative. In particular, infants younger than 9 months are dependent on others to protect them from danger – they are generally incapable of removing themselves from the fire source if inaction should occur, and cannot "stop, drop, and roll" if clothing catches fire. Moreover, those infants that are mobile at this age are at risk of exposure to ignition sources. We must be diligent in ensuring that this extremely vulnerable group is adequately protected. Revocation of the relaxed flammability standards will help ensure this outcome.

The revocation of the relaxed flammability standard for snug-fitting sleepwear is just as important to our children's safety. While tight-fitting sleepwear is less likely to come in contact with a flame or other ignition source, the garment must be nearly skintight, and tight at the wrists, ankles, waist and other key points for it to be a "safer choice." Furthermore, parents often acquire such sleepwear – either by purchasing or through "hand-me downs" – that is larger than the child currently wears. If the garment is purchased larger, allowing room for a child to "grow into it," the purpose of tight-fitting, from a burn safety perspective, has been defeated. It is also questionable whether tight fit will compensate for the increased dangers associated with a more flammable material such as cotton.

Available injury and death data suggest that the more stringent flammability standards in effect prior to the September 1996 relaxation by the CPSC were clearly working. There have been fewer injuries or deaths involving ignition of children's sleepwear since enactment of the standard nearly twenty-five years

Office of the Secretary  
Page 2  
February 4, 1999

As a member of the health care profession burn team, who must deal with the pain, suffering, and cost of burn injuries on a daily basis, I strongly support the proposed revocation of the relaxed flammability standards for children's sleepwear. It can make a difference in the prevention of death and disfigurement for our nation's children.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael D. Peck". The signature is fluid and cursive, with a large initial "M" and "D".

Michael D. Peck, M.D., Director  
North Carolina Jaycee Burn Center  
Professor of Surgery

CC: ABA

MDP/nsc

CF99-1-56



# NORTH CAROLINA JAYCEE BURN CENTER

OFFICE OF THE SECRETARY  
FREEDOM OF INFORMATION

February 11 1999 A 10: 58

University of North Carolina Hospitals  
Chapel Hill, NC 27514  
(919) 966-3693 / 3571  
FAX: (919) 966-5732

*Director*  
Michael D. Peck, M.D., Sc.D., F.A.C.S.  
Professor of Surgery

*Assistant Director*  
Anthony A. Meyer, Ph.D., M.D., F.A.C.S.  
Professor of Surgery

*Burn Care Coordinator*  
Anita Maready Fields, B.S.N.

*Chaplain*  
Shirley M. Massey, B.A., M.Div.

*Clinical Research Nurse*  
Ann Bonham, RN, MSN

*Dietician*  
Yih Chang, M.S., R.D., C.N.S.D.

*Division Manager*  
Kay Teague

*Nurse Manager*  
Charles M. Hall, R.N., B.S.N.

*Occupational Therapy*  
Sydney Thornton, O.T.R./L.

*Outreach Clinician*  
Ernest J. Grant, R.N., M.S.N.

*Physical Therapy*  
Kristin Kaupang, M.S., P.T.

*Recreational Therapy*  
Jodi McKenzie, M.A., C.T.R.S.

*Rehabilitation Counselor*  
Catherine T. Calvert, Ph.D., C.R.C.

*Social Worker*  
Diane Priolo, C.C.S.W., A.C.S.W.

*Surgeon Assistant*  
Marian E. Cranford, B.S., P.A.

Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20207

## RE: Sleepwear Revocation

I strongly support the proposed revocation by the Consumer Product Safety (CPSC) of the relaxed flammability standards for children's sleepwear. This action would reinstate the previous, stricter CPSC standards for children's sleepwear flammability – standards that are needed to help prevent death and disfigurement for hundreds of our nations infants and young children.

Burn injuries and deaths are preventable, and safe sleepwear for infants and young children is a critical part of any prevention initiative. In particular, infants younger than 9 months are dependent on others to protect them from danger – they are generally incapable of removing themselves from the fire source if ination should occur, and cannot "stop, drop, and roll" if clothing catches fire. Moreover, those infants that are mobile at this age are at risk of exposure to ignition sources. We must be diligent in ensuring that this extremely vulnerable group is adequately protected. Revocation of the relaxed flammability standards will help ensure this outcome.

The revocation of the relaxed flammability standard for snug-fitting sleepwear is just as important to our children's safety. While tight-fitting sleepwear is less likely to come in contact with a flame or other ignition source, the garment must be nearly skintight, and tight at the wrists, ankles, waist and other key points for it to be a "safer choice." Furthermore, parents often acquire such sleepwear – either by purchasing or through "hand-me downs" – that is larger than the child currently wears. If the garment is purchased larger, allowing room for a child to "grow into it," the purpose of tight-fitting, from a burn safety perspective, has been defeated. It is also questionable whether tight fit will compensate for the increased dangers associated with a more flammable material such as cotton.

Available injury and death data suggest that the more stringent flammability standards in effect prior to the September 1996 relaxation by the CPSC were clearly working. There have been fewer injuries or deaths involving ignition of children's sleepwear since enactment of the standard nearly twenty-five years

Office of the Secretary

Page 2

February 4, 1999

As a member of the health care profession burn team, who must deal with the pain, suffering, and cost of burn injuries on a daily basis, I strongly support the proposed revocation of the relaxed flammability standards for children's sleepwear. It can make a difference in the prevention of death and disfigurement for our nation's children.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles M. Hall".

Charles M. Hall, RN, BSN  
Nurse Manager

CC: ABA

CMH/nsc

Children's Hospital Oakland 

OFFICES OF THE SECRETARY  
 DEPARTMENT OF INFORMATION  
 Office of the Secretary  
 Consumer Product Safety Commission  
 Washington, DC 20207  
 2/5/99

**RE: Sleepwear Revocation**

I strongly support the proposed revocation by the consumer Product Safety Commission (CPSC) of the relaxed flammability standards for children's sleepwear. The action would reinstate the previous, stricter CPSC standards for children's sleepwear flammability-standards that are needed to prevent death and disfigurement for hundred's of our nations children.

Many burn injuries and deaths are preventable, and safe sleepwear for infants and young children is a critical component of any prevention initiative. Infants under the age of 9 months are dependent upon others to protect them from danger, and are generally incapable of removing themselves from the source if ignition should occur, and cannot "stop, drop, and roll" if clothing catches on fire. We must protect this extremely vulnerable group. Revocation of the relaxed flammability standards will help ensure this outcome.

The revocation of the relaxed flammability standard for snug-fitting sleepwear is just as important to our children's safety. The entire issue of tight-fitting sleepwear is questionable-parents often purchase sleepwear large in order to allow room for growth, acquired sleepwear rarely meets this standard, and in order to avoid coming into contact with an ignition source sleepwear needs to be nearly skin tight. It is questionable whether tight fit will compensate for the increased dangers associated with a more flammable material such as cotton.

Available injury and death data suggest that the more stringent flammability standards in effect prior to September 1996 relaxation by the CPSC were clearly working. There have been fewer injuries or deaths involving ignition of children's sleepwear since enactment of the standard nearly 25 years ago. This low level of injuries and deaths can primarily be attributed to the more stringent, previously established flammability standards.

As a member of the health care profession and director of a pediatric burn center who must deal with the pain, suffering, and cost of burn injuries on a daily basis, I strongly support the proposed revocation of the relaxed flammability standards for children's sleepwear. It can make a difference in the prevention of death and disfigurement for our nation's children.

Sincerely,

*Patricia Taggart MBA, PT*

Patricia Taggart, MBA, PT  
 Director, Burn Center

*The pediatric medical center  
 for Northern California*

747 Fifty Second Street  
 Oakland, CA 94609-1809  
 510-428-3000

CF99-1-7



OFFICE OF THE SECRETARY  
DEPARTMENT OF INFORMATION

1999 FEB 11 A 10:16

February 5, 1999

Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20207

LEONARD C. SCHWAB  
Executive Vice President

Post Office Box 1742

Cumberland, Maryland 21501

Tel: 301.729.4488

Fax: 301.729.0065

lschwab@sschwab.com

Re: Sleepwear Revocation

Dear Commissioners:

We understand that the Commission is asking for comments about changes in the Flammability law as it affects infants up to 9 months. I have been in this business for many years and remember, when the law initially came into effect, we were told that there were several burn injuries each year due to ignition of children's clothing. Most of these cases were little girls with loosely fitting gowns who got too close to a fireplace.

Thirty years have passed and the number of burn injuries due to infants clothing have not increased. It has been our experience that mothers of newborn infants do not want to put either polyester or treated cotton on their new babies. If those of us who are important factors in the infant's sleepwear business are not making cotton, the consumer will buy it from one of the smaller manufacturers who never stopped making it. The Commission found that it was an almost impossible job to enforce the standard because if customers want cotton, somebody is going to make it.

The standard was never applied to sheets or bedcovers so that if some unthinking person were to drop a cigarette or a match in a crib, the sheets and covers would catch fire long before there was a chance for the clothing to burn. **Our customers, and consumers in general, are happy with the standard as it is.** They have been demanding cotton and they are getting it. Sales have increased with the change to cotton, yet the number of burn injuries for infants due to their clothing catching fire has been negligible, if there have been any at all. **Changing the standard for infants would accomplish little or nothing.** We certainly hope that you will let the situation stand as it is now. I can assure you that it would make legitimate manufacturers and the mothers of America much happier.

Sincerely Yours,

Leonard C. Schwab  
Executive Vice President



February 9, 1999

Sadye E. Dunn  
 Secretary  
 Consumer Product Safety Commission  
 Washington, DC 20207

Re: Sleepwear Revocation

Dear Ms. Dunn:

We are writing to urge the Consumer Product Safety Commission to revoke its 1996 amendments to the Flammable Fabrics Act and return to the stronger fire safety standards which kept children safe for more than twenty-five years.

As you know, after passage of the strict fire safety standard, the number of children suffering from burns dropped dramatically. In fact, the National Fire Protection Association estimates that without this standard, there would have been ten times as many deaths, and substantially more injuries, associated with children's sleepwear. Clearly it is a protection that worked.

Some argue that there has been no increase in the number of burn injuries and deaths since the standard changed. This is partially due to problems in reporting burn injuries. Furthermore, we do not believe that we should wait for children to be injured before we return to a standard which worked for decades. There are several problems with the new standards that we believe will put America's children in danger in the future.

The revised standard which exempts "tight-fitting" sleepwear in children's sizes up to 14 is based on the assumption that parents will dress their children in tight clothes. Anyone who has bought clothing for a child knows you do not buy something that fits tightly-you buy something big enough for the child to grow into. Many parents dress their children in hand-me-downs which may be far too big for the child. The combination of non-flame resistant material and large, baggy clothing can be lethal.

The revised standard which exempts sleepwear for infants nine months and younger from any fire safety regulations is even more dangerous. Many infants at this age are crawling, and should they somehow become exposed to a flame would be completely vulnerable. Infants deserve more protection, not less.



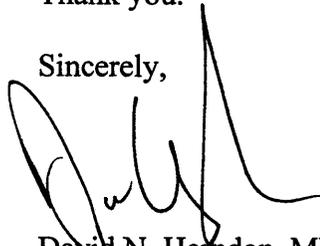
**Shriners Burns Hospital - Galveston**

815 MARKET STREET • GALVESTON, TX 77550-2725 • 409-770-6600 • FAX 409-770-6749

The CPSC's decision to relax the fire safety standard was made with the understanding that the manufacturers' would fund a substantial public awareness campaign so that consumers would understand the importance of dressing their children in tight-fitting clothes. This campaign has not materialized. Furthermore, the tags which are supposed to let parents know a garment is not flame resistant are difficult to understand, and are almost uniformly written in English—making it impossible for Spanish-speaking parents to understand that a garment is not flame resistant.

We have the utmost respect for the Consumer Product Safety Commission. The CPSC is the premier agency for protecting our children's safety. Parents look to you to help them ensure their children will grow up happy and healthy. We urge you not to send parents the wrong message. Please return to the strict fire safety standard, which was in place until 1996. Please do not wait until the number of children burned begins to rise before you act to protect them. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Herndon', written over a large, light-colored circular mark.

David N. Herndon, MD  
Chief of Staff  
Shriners Burns Hospital  
Professor of Surgery  
Jesse H. Jones Distinguished Chair in Burn Surgery  
University of Texas Medical Branch

DNH/lj



**LAC+USC**

Los Angeles County  
University of Southern California  
Medical Center

CF99-1-9

1200 North State Street  
Los Angeles, CA 90033

Phone: [213]

County of Los Angeles  
Department of Health Services

February 9, 1999

Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20207

**RE: Sleepwear Revocation**

I strongly support the proposed revocation by the Consumer Product Safety Commission (CPSC) of the relaxed flammability standards for children's sleepwear. This action would reinstate the previous, stricter CPSC standards for children's flammability-standards that are needed to help prevent death and disfigurement for hundreds of our nation's infants and young children.

Burn injuries and deaths are preventable, and safe sleepwear for infants and young children is a critical part of any prevention initiative. We must be diligent in ensuring that this extremely vulnerable group is adequately protected.

The revocation of the relaxed flammability standard for snug-fitting sleepwear is just as important to our children's safety. While tight-fitting sleepwear is less likely to come in contact with a flame or other ignition source, the garment must be nearly skintight for it to be a "safer choice." It is also questionable whether tight fit will compensate for the increased dangers associated with a more flammable material such as cotton.

Available data suggests that since more stringent flammability standards are in effect, there have been fewer injuries or deaths involving ignition of children's sleepwear. This low level of injuries and deaths can primarily be attributed to the more stringent previously established flammability standards.

As a member of the health care profession and as a member of the LAC+USC Burn Center, who must deal with the pain, suffering, and cost of burn injuries on a daily basis, I strongly support the proposed revocation of the relaxed flammability standards for children's sleepwear. It can make a difference in the prevention of death and disfigurement for our nation's children.

Sincerely,

Warren L. Garner, M.D.  
Director, Burn Center

cc: The American Burn Association

WLG:pg

*BURN CENTER - ROOM 12-650*  
*Phone: (323) 226-7750 Fax: (323) 226-2290*

Mission: To provide accessible, affordable, and culturally sensitive health care, one person at a time.

# Wound Healing Center

Retreat Hospital



OFFICE OF THE SECRETARY  
FREEDOM OF INFORMATION

1999 FEB 10 A 9:14

2621 Grove Avenue  
Richmond, Virginia 23220  
Telephone: 804 254 5403

1 800 292 2303  
Hyperbaric Unit: 804 254 5372

Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20207

## RE: Sleepwear Revocation

I strongly support the proposed revocation by the Consumer Product Safety Commission (CPSC) of the relaxed flammability standards for children's sleepwear. This action would reinstate the previous, stricter CPSC standards for children's sleepwear flammability—standards that are needed to help prevent death and disfigurement for hundreds of our nation's infants and young children.

- Burn injuries and deaths are preventable, and safe sleepwear for infants and young children is a critical part of any prevention initiative. In particular, infants younger than 9 months are dependent on others to protect them from danger—they are generally incapable of removing themselves from the fire source if ignition should occur, and cannot “stop, drop, and roll” if clothing catches fire. Moreover, those infants that are mobile at this age are at risk of exposure to ignition sources. We must be diligent in ensuring that this extremely vulnerable group is adequately protected. Revocation of the relaxed flammability standards will help ensure this outcome.
- The revocation of the relaxed flammability standard for snug-fitting sleepwear is just as important to our children's safety. While tight-fitting sleepwear is less likely to come in contact with a flame or other ignition source, the garment must be nearly skintight, and tight at the wrists, ankles, waist and other key points for it to be a “safer choice.” Furthermore, parents often acquire such sleepwear—either by purchasing or through “hand-me-downs”—that is larger than the child currently wears. If the garment is purchased large, allowing room for a child to “grow into it,” the purpose of tight-fitting, from a burn safety perspective, has been defeated. It is also questionable whether tight fit will compensate for the increased dangers associated with a more flammable material such as cotton.
- Available injury and death data suggest that the more stringent flammability standards in effect prior to the September 1996 relaxation by the CPSC were clearly working. There have been fewer injuries or deaths involving ignition of children's sleepwear since enactment of the standard nearly twenty-five years ago. This low level of injuries and deaths can primarily be attributed to the more stringent, previously established flammability standards.

As a member of the health care profession (Clinical Director) who must deal with the pain, suffering, and cost of burn injuries on a daily basis, I strongly support the proposed revocation of the relaxed flammability standards for children's sleepwear. It *can* make a difference in the prevention of death and disfigurement for our nation's children.

Sincerely,

Mary Crossland, R.N., BSN.  
Clinical Director.



1999 FEB 10 A 9:15

Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20207

**RE: Sleepwear Revocation**

I strongly support the proposed revocation by the Consumer Product Safety Commission (CPSC) of the relaxed flammability standards for children's sleepwear. This action would reinstate the previous, stricter CPSC standards for children's sleepwear flammability—standards that are needed to help prevent death and disfigurement for hundreds of our nation's infants and young children.

- Burn injuries and deaths are preventable, and safe sleepwear for infants and young children is a critical part of any prevention initiative. In particular, infants younger than 9 months are dependent on others to protect them from danger—they are generally incapable of removing themselves from the fire source if ignition should occur, and cannot “stop, drop, and roll” if clothing catches fire. Moreover, those infants that are mobile at this age are at risk of exposure to ignition sources. We must be diligent in ensuring that this extremely vulnerable group is adequately protected. Revocation of the relaxed flammability standards will help ensure this outcome.
- The revocation of the relaxed flammability standard for snug-fitting sleepwear is just as important to our children's safety. While tight-fitting sleepwear is less likely to come in contact with a flame or other ignition source, the garment must be nearly skintight, and tight at the wrists, ankles, waist and other key points for it to be a “safer choice.” Furthermore, parents often acquire such sleepwear—either by purchasing or through “hand-me-downs”—that is larger than the child currently wears. If the garment is purchased large, allowing room for a child to “grow into it,” the purpose of tight-fitting, from a burn safety perspective, has been defeated. It is also questionable whether tight fit will compensate for the increased dangers associated with a more flammable material such as cotton.
- Available injury and death data suggest that the more stringent flammability standards in effect prior to the September 1996 relaxation by the CPSC were clearly working. There have been fewer injuries or deaths involving ignition of children's sleepwear since enactment of the standard nearly twenty-five years ago. This low level of injuries and deaths can primarily be attributed to the more stringent, previously established flammability standards.

As a member of the health care profession (Medical Director) who must deal with the pain, suffering, and cost of burn injuries on a daily basis, I strongly support the proposed revocation of the relaxed flammability standards for children's sleepwear. It *can* make a difference in the prevention of death and disfigurement for our nation's children.

Sincerely,

Joseph V Boykin, Jr., M.D.  
Medical Director.

REC'D OFC OF THE SECRETARY  
FREEDOM OF INFORMATION

1999 FEB 10 A 9: 16

Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20207

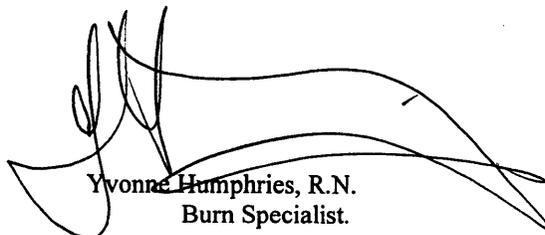
**RE: Sleepwear Revocation**

I strongly support the proposed revocation by the Consumer Product Safety Commission (CPSC) of the relaxed flammability standards for children's sleepwear. This action would reinstate the previous, stricter CPSC standards for children's sleepwear flammability—standards that are needed to help prevent death and disfigurement for hundreds of our nation's infants and young children.

- Burn injuries and deaths are preventable, and safe sleepwear for infants and young children is a critical part of any prevention initiative. In particular, infants younger than 9 months are dependent on others to protect them from danger—they are generally incapable of removing themselves from the fire source if ignition should occur, and cannot “stop, drop, and roll” if clothing catches fire. Moreover, those infants that are mobile at this age are at risk of exposure to ignition sources. We must be diligent in ensuring that this extremely vulnerable group is adequately protected. Revocation of the relaxed flammability standards will help ensure this outcome.
- The revocation of the relaxed flammability standard for snug-fitting sleepwear is just as important to our children's safety. While tight-fitting sleepwear is less likely to come in contact with a flame or other ignition source, the garment must be nearly skintight, and tight at the wrists, ankles, waist and other key points for it to be a “safer choice.” Furthermore, parents often acquire such sleepwear—either by purchasing or through “hand-me-downs”—that is larger than the child currently wears. If the garment is purchased large, allowing room for a child to “grow into it,” the purpose of tight-fitting, from a burn safety perspective, has been defeated. It is also questionable whether tight fit will compensate for the increased dangers associated with a more flammable material such as cotton.
- Available injury and death data suggest that the more stringent flammability standards in effect prior to the September 1996 relaxation by the CPSC were clearly working. There have been fewer injuries or deaths involving ignition of children's sleepwear since enactment of the standard nearly twenty-five years ago. This low level of injuries and deaths can primarily be attributed to the more stringent, previously established flammability standards.

As a member of the health care profession (burn specialist) who must deal with the pain, suffering, and cost of burn injuries on a daily basis, I strongly support the proposed revocation of the relaxed flammability standards for children's sleepwear. It *can* make a difference in the prevention of death and disfigurement for our nation's children.

Sincerely,



Yvonne Humphries, R.N.  
Burn Specialist.

99-1-1.

Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20207

**RE: Sleepwear Revocation**

I strongly support the proposed revocation by the Consumer Product Safety Commission (CPSC) of the relaxed flammability standards for children's sleepwear. This action would reinstate the previous, stricter CPSC standards for children's sleepwear flammability—standards that are needed to help prevent death and disfigurement for hundreds of our nation's infants and young children.

- Burn injuries and deaths are preventable, and safe sleepwear for infants and young children is a critical part of any prevention initiative. In particular, infants younger than 9 months are dependent on others to protect them from danger—they are generally incapable of removing themselves from the fire source if ignition should occur, and cannot “stop, drop, and roll” if clothing catches fire. Moreover, those infants that are mobile at this age are at risk of exposure to ignition sources. We must be diligent in ensuring that this extremely vulnerable group is adequately protected. Revocation of the relaxed flammability standards will help ensure this outcome.
- The revocation of the relaxed flammability standard for snug-fitting sleepwear is just as important to our children's safety. While tight-fitting sleepwear is less likely to come in contact with a flame or other ignition source, the garment must be nearly skintight, and tight at the wrists, ankles, waist and other key points for it to be a “safer choice.” Furthermore, parents often acquire such sleepwear—either by purchasing or through “hand-me-downs”—that is larger than the child currently wears. If the garment is purchased large, allowing room for a child to “grow into it,” the purpose of tight-fitting, from a burn safety perspective, has been defeated. It is also questionable whether tight fit will compensate for the increased dangers associated with a more flammable material such as cotton.
- Available injury and death data suggest that the more stringent flammability standards in effect prior to the September 1996 relaxation by the CPSC were clearly working. There have been fewer injuries or deaths involving ignition of children's sleepwear since enactment of the standard nearly twenty-five years ago. This low level of injuries and deaths can primarily be attributed to the more stringent, previously established flammability standards.

As a member of the health care profession who must deal with the pain, suffering, and cost of burn injuries on a daily basis, I strongly support the proposed revocation of the relaxed flammability standards for children's sleepwear. It *can* make a difference in the prevention of death and disfigurement for our nation's children.

Sincerely,

Vicki L. Sommer RN

Vicki L. Sommer RN

Richmond Virginia

Carolyn Hassan  
3701 Wakefield Rd.  
Richmond, Va. 23235

Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20207

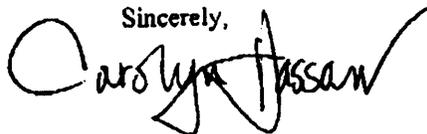
**RE: Sleepwear Revocation**

I strongly support the proposed revocation by the Consumer Product Safety Commission (CPSC) of the relaxed flammability standards for children's sleepwear. This action would reinstate the previous, stricter CPSC standards for children's sleepwear flammability—standards that are needed to help prevent death and disfigurement for hundreds of our nation's infants and young children.

- Burn injuries and deaths are preventable, and safe sleepwear for infants and young children is a critical part of any prevention initiative. In particular, infants younger than 9 months are dependent on others to protect them from danger—they are generally incapable of removing themselves from the fire source if ignition should occur, and cannot “stop, drop, and roll” if clothing catches fire. Moreover, those infants that are mobile at this age are at risk of exposure to ignition sources. We must be diligent in ensuring that this extremely vulnerable group is adequately protected. Revocation of the relaxed flammability standards will help ensure this outcome.
- The revocation of the relaxed flammability standard for snug-fitting sleepwear is just as important to our children's safety. While tight-fitting sleepwear is less likely to come in contact with a flame or other ignition source, the garment must be nearly skintight, and tight at the wrists, ankles, waist and other key points for it to be a “safer choice.” Furthermore, parents often acquire such sleepwear—either by purchasing or through “hand-me-downs”—that is larger than the child currently wears. If the garment is purchased large, allowing room for a child to “grow into it,” the purpose of tight-fitting, from a burn safety perspective, has been defeated. It is also questionable whether tight fit will compensate for the increased dangers associated with a more flammable material such as cotton.
- Available injury and death data suggest that the more stringent flammability standards in effect prior to the September 1996 relaxation by the CPSC were clearly working. There have been fewer injuries or deaths involving ignition of children's sleepwear since enactment of the standard nearly twenty-five years ago. This low level of injuries and deaths can primarily be attributed to the more stringent, previously established flammability standards.

As a member of the health care profession who must deal with the pain, suffering, and cost of burn injuries on a daily basis, I strongly support the proposed revocation of the relaxed flammability standards for children's sleepwear. It *can* make a difference in the prevention of death and disfigurement for our nation's children.

Sincerely,



CF99-1-11

Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20207

**RE: Sleepwear Revocation**

I strongly support the proposed revocation by the Consumer Product Safety Commission (CPSC) of the relaxed flammability standards for children's sleepwear. This action would reinstate the previous, stricter CPSC standards for children's sleepwear flammability—standards that are needed to help prevent death and disfigurement for hundreds of our nation's infants and young children.

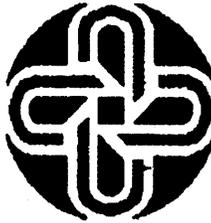
- Burn injuries and deaths are preventable, and safe sleepwear for infants and young children is a critical part of any prevention initiative. In particular, infants younger than 9 months are dependent on others to protect them from danger—they are generally incapable of removing themselves from the fire source if ignition should occur, and cannot "stop, drop, and roll" if clothing catches fire. Moreover, those infants that are mobile at this age are at risk of exposure to ignition sources. We must be diligent in ensuring that this extremely vulnerable group is adequately protected. Revocation of the relaxed flammability standards will help ensure this outcome.
- The revocation of the relaxed flammability standard for snug-fitting sleepwear is just as important to our children's safety. While tight-fitting sleepwear is less likely to come in contact with a flame or other ignition source, the garment must be nearly skintight, and tight at the wrists, ankles, waist and other key points for it to be a "safer choice." Furthermore, parents often acquire such sleepwear—either by purchasing or through "hand-me-downs"—that is larger than the child currently wears. If the garment is purchased large, allowing room for a child to "grow into it," the purpose of tight-fitting, from a burn safety perspective, has been defeated. It is also questionable whether tight fit will compensate for the increased dangers associated with a more flammable material such as cotton.
- Available injury and death data suggest that the more stringent flammability standards in effect prior to the September 1996 relaxation by the CPSC were clearly working. There have been fewer injuries or deaths involving ignition of children's sleepwear since enactment of the standard nearly twenty-five years ago. This low level of injuries and deaths can primarily be attributed to the more stringent, previously established flammability standards.

As a member of the health care profession who must deal with the pain,  
suffering, and cost of burn injuries on a daily basis, I strongly support the proposed revocation of the relaxed  
flammability standards for children's sleepwear. It can make a difference in the prevention of death and  
disfigurement for our nation's children.

Sincerely,

*Ann H. Brown, RN*  
(ANN H. BROWN, RN)

Baltimore, MD 21205



**FAIRFIELD MEDICAL CENTER**  
**401 NORTH EWING STREET, LANCASTER, OHIO 43130 \* 740-687-8000**  
**FACSIMILE TRANSMISSION COVER PAGE**  
**CONFIDENTIAL INFORMATION**

**Date:** 2/19/99  
**Time:** 1330 a.m./p.m.

**\*Total Number of Pages:** 2  
 (Including Cover Page)

**To: \*** Office of the Secretary  
NAME OF AUTHORIZED RECIPIENT  
 \* CPS  
DEPARTMENT  
 \* \_\_\_\_\_  
FACILITY NAME  
 \_\_\_\_\_  
STREET ADDRESS  
Washington DC 20207  
CITY/STATE/ZIP CODE

\* 301 504 0127  
FACSIMILE NUMBER  
 \* \_\_\_\_\_  
VOICE TELEPHONE NUMBER

**From: \*** Anne N. Brown  
NAME OF SENDER  
 \* INTENSIVE CARE UNIT  
DEPARTMENT

\* (740) 687-8330  
FACSIMILE NUMBER  
 \* (740) 687-8390  
VOICE TELEPHONE NUMBER

**Re: \*** Sleep wear Revocation  
PATIENT/CLIENT NAME

\* Information must be filled in.

**WARNING:** This transmittal contains PRIVILEGED AND CONFIDENTIAL information intended for use recipient named above. Any disclosure, copying, distributing, or use of information contained in this transmittal by any other person is strictly prohibited.

If you have received this transmittal in error: 1) Please notify us immediately by telephone; 2) Return the misdirected transmittal by U.S. mail OR destroy the transmittal copies. Thank you.

**INSTRUCTIONS TO AUTHORIZED RECEIVER:** Please call the sender listed above to verify receipt of material OR complete the following verification and return to sender via the above FAX number.

I, \_\_\_\_\_ verify I have received \_\_\_\_\_  
(# of Pages Including Cover)

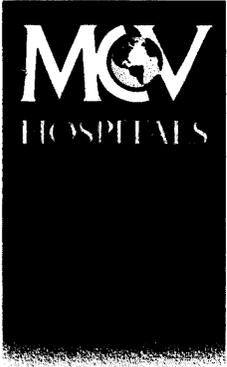
from FAIRFIELD MEDICAL CENTER.

This information has been disclosed to you from CONFIDENTIAL RECORDS. You are prohibited from making any further re-disclosure of the record without the specific written consent of the person to whom it pertains.

**FORWARD ORIGINAL TO PATIENT MEDICAL RECORD**

(CONTINUED ON REVERSE)

CF 99-1-12



Virginia Commonwealth University

February 15, 1999

Office of Secretary  
Consumer Product Safety Commission  
Washington DC 20207

RE: sleepwear revocation

Dear CPSC:

I strongly support the proposed revocation by the Consumer Product Safety Commission of the relaxed flammability standards for children's sleepwear. This action would reinstate the previous, stricter CPSC standards for children's sleepwear flammability. The standards are needed to help prevent death and disfigurement for hundreds of our nations infants and young children.

Available injury and death data suggests that more stringent flammability in effect prior to the September 1996 relaxation by the CPSC were clearly working. There has been fewer injuries or deaths involving ignition of children's sleepwear since enactment of this standard nearly 25 years ago. This low level of injuries and deaths can primarily be attributed to the more stringent previously established flammability standards.

As a member of the burn team who must deal with the pain, suffering, and the cost of burn injuries on a daily basis, I strongly support the proposed revocation of the relaxed flammability standards for children's sleepwear. These standards can make a difference in the prevention of death and disfigurement of our nation's children.

Sincerely,

Jay A. Yelon, D.O.

cc: American Burn Association  
635 N. Michigan Ave. Station 1530  
Chicago, IL 60611  
Attn: John A. Krichbaum, JD

**GENERAL SURGERY**  
**SECTION OF**  
**TRAUMA/CRITICAL CARE/**  
**BURN SURGERY**

1200 EAST BROAD STREET  
P.O. Box 980454  
RICHMOND, VIRGINIA 23298-0454

804 828-7748  
FAX: 804 827-0285  
TDD: 1-800 828-1120

**RAO R. IVATURY, M.D.**  
*PROFESSOR OF SURGERY*  
*DIRECTOR, TRAUMA/CRITICAL CARE*

**JAY A. YELON, D.O.**  
*ASSISTANT PROFESSOR OF SURGERY*  
*CO-DIRECTOR, EVANS-HAYNES*  
*BURN CENTER*

**GINGER MORSE, R.N., M.N.**  
*TRAUMA PROGRAM DIRECTOR*

**KELLY GUILFORD, R.N.**  
*TRAUMA REGISTRAR*

**DANA M. POWELL, R.N.**  
*TRAUMA REGISTRAR*



**EVANS HAYNES BURN CENTER**  
**MCV Hospitals**  
**P.O. Box 985872**  
**Richmond, VA 23298-5869**  
**(804)828.9240 Fax: (804)828.4291**

Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20207

RE: Sleepwear Revocation

I strongly support the proposed revocation by the Consumer Product Safety Commission (CPSC) of the relaxed flammability standards for children's sleepwear. This action would reinstate the previous, stricter CPSC standards for children's sleepwear flammability. These stricter standards are necessary to help prevent death and disfigurement for our nation's infants and young children.

Burn injuries and deaths are preventable. Safer sleepwear for infants and young children is a critical part of any prevention initiative. As you are aware, infants and young toddlers are unable to protect themselves and are therefore dependent on others. The infant, for instance is unable to remove their clothing if it were to catch fire, while the older infant with their increased mobility are at risk of exposure to ignition sources. For these reasons, stricter standards are necessary. We must be diligent in ensuring that this vulnerable group is adequately protected. Revocation of the relaxed flammability standards will help ensure this outcome.

Available injury and death data suggest that the more stringent flammability standards in effect prior to the September 1996 relaxation by the CPSC were clearly working. There have been fewer injuries or deaths involving ignition of children's sleepwear since the enactment of the standard nearly twenty-five years ago. This low level can primarily be attributed to the more stringent, previously established flammability standards.

As a member of the burn team at Evans Haynes Burn Center who deals with the pain and suffering of patients and their families on a daily basis, I strongly support the proposed revocation of the relaxed flammability standards for children's sleepwear. It can make a difference in the prevention of death and disfigurement for our nation's children.

Sincerely,  
  
Leslie Riddel, RN, B.S.N.



**EVANS HAYNES BURN CENTER**  
**MCV Hospitals**  
**P.O. Box 985872**  
**Richmond, VA 23298-5869**  
**(804)828.9240 Fax: (804)828.4291**

Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20207

RE: Sleepwear Revocation

I strongly support the proposed revocation by the Consumer Product Safety Commission (CPSC) of the relaxed flammability standards for children's sleepwear. This action would reinstate the previous, stricter CPSC standards for children's sleepwear flammability. These standards are needed to help prevent death and disfigurement for hundreds of our nation's infants and young children.

Burn injuries and deaths are preventable and safe sleepwear for infants and young children is a critical part of any prevention initiative. As you are aware, infants and young toddlers are dependent on others to protect them from danger. While the older infant is mobile they are at risk of exposure to ignition sources. We must be diligent in ensuring that this vulnerable group is adequately protected. Revocation of the relaxed flammability standards will help ensure this outcome.

Available injury and death data suggest that the more stringent flammability standards in effect prior to the September 1996 relaxation by the CPSC were clearly working. There have been fewer injuries or deaths involving ignition of children's sleepwear since enactment of the standard nearly twenty-five years ago. This low level of injuries and deaths can primarily be attributed to the more stringent, previously established flammability standards.

As a member of the Evans-Haynes Burn Center health care team, I strongly support the proposed revocation of the relaxed flammability standards for children's sleepwear. It can make a difference in the prevention of death and disfigurement for our nation's children.

Sincerely,

A handwritten signature in cursive script that reads 'Christine'.

Christine Turner, RN, B.S.N.  
Burn Outreach Coordinator



**EVANS HAYNES BURN CENTER**  
**MCV Hospitals**  
**P.O. Box 985872**  
**Richmond, VA 23298-5869**  
**(804)828.9240 Fax: (804)828.4291**

Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20207

RE: Sleepwear Revocation

I strongly support the proposed revocation by the Consumer Product Safety Commission (CPSC) of the relaxed flammability standards for children's sleepwear. This action would reinstate the previous, stricter CPSC standards for children's sleepwear flammability. These standards are needed to help prevent death and disfigurement for hundreds of our nation's infants and young children.

Burn injuries and deaths are preventable and safe sleepwear for infants and young children is a critical part of any prevention initiative. As you are aware, infants and young toddlers are dependent on others to protect them from danger. While the older infant is mobile they are at risk of exposure to ignition sources. We must be diligent in ensuring that this vulnerable group is adequately protected. Revocation of the relaxed flammability standards will help ensure this outcome.

Available injury and death data suggest that the more stringent flammability standards in effect prior to the September 1996 relaxation by the CPSC were clearly working. There have been fewer injuries or deaths involving ignition of children's sleepwear since enactment of the standard nearly twenty-five years ago. This low level of injuries and deaths can primarily be attributed to the more stringent, previously established flammability standards.

As a member of the Evans-Haynes Burn Center health care team, I strongly support the proposed revocation of the relaxed flammability standards for children's sleepwear. It can make a difference in the prevention of death and disfigurement for our nation's children.

Sincerely,

Deborah Graham, RN, CCRN  
Nurse Manager, Evans-Haynes Burn Center

ASSOCIATION OF TRIAL LAWYERS OF AMERICA <sup>CF99-1-13</sup>

1050 31st Street, N.W., Washington, D.C. 20007-4499  
(202) 965-3500 • (800) 424-2725 • FAX (202) 625-7312

PRESIDENT  
MARK S. MANDELL

1 PARK ROW  
PROVIDENCE, RI 02903  
401-273-8330  
FAX 401-751-7830

February 16, 1999

Thomas H. Moore  
Commissioner  
U.S. Consumer Product Safety Commission  
Washington, DC 20207

Dear Mr. Moore:

Thank you for your letter dated February 8.

Your detailing of the CPSC's decision-making process regarding its amendment to the children's sleepware standard under the Flammable Fabrics Act was both edifying and instructive. I regret if you felt my column in any way misinterpreted or inaccurately presented CPSC statistics or policy. ATLA, its leadership and members, which have worked closely with the CPSC to help protect American families, are sensitive to your concerns, and I assure you that this was not my intention.

As you succinctly put it in your April 30, 1996, vote on the amendment, "there is no perfect solution to [this] dilemma." I have no doubt whatsoever that the Commission, when it made its decision permitting the sale of snug-filling cotton sleepwear in sizes nine months or lower, did so with the safety of children foremost in mind. And ATLA applauds the CPSC for working with manufacturers to make sure that notices and hangtags alerting buyers to the need to purchase appropriate sizes are prominently displayed.

That being said, the concern expressed in my column remains real. Parents, despite such warnings, will still be inclined to purchase this cotton sleepware, especially for their new arrivals, in sizes a bit larger than the child's present size to allow room for growth. And ill-fitting "hand-me-downs," which may have been snug on the kids who have since outgrown them, will still be used by parents unable to afford new, form-fitting garments for their younger children.

Again, there is no easy answer to this predicament. Given the importance of this issue to families everywhere, however, we will draft a follow-up column on children's sleepwear in the near future. And we welcome your assistance in the endeavor. Any statistics that may have surfaced since the amendment went into effect regarding its impact on parents switching from loose-fitting garments to tight-fitting sleepwear, or on the number of sleepwear injuries or deaths would be of interest.

Thomas H. Moore  
February 16, 1999  
Page 2 of 2

In attempting to inform consumers about issues important to family safety, ATLA is conscious of the protections provided by the CPSC, and the Association and its members look to the Commission's findings and rulings with respect and gratitude.

Thank you again for your important letter. I commend the CPSC for the work it has done - and continues to do - on behalf of consumers, and hope we can work even more closely in the future to safeguard the health and safety of America's families.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark S. Mandell". The signature is fluid and cursive, with a large initial "M" and a distinct "S" and "M" for the last name.

Mark S. Mandell  
President



U. S. CONSUMER PRODUCT SAFETY COMMISSION  
WASHINGTON, D.C. 20207

Office of Commissioner Moore

February 8, 1999

Mark S. Mandell, Esq.  
President  
Association of Trial Lawyers of America  
1050 31st Street, N.W.  
Washington, D.C. 20007

Dear Mr. Mandell:

I recently read your article regarding children's sleepwear (coauthored with Don C. Prachthauser) which appeared in several Wisconsin newspapers. I welcome your input in this very important area but feel compelled to respond to several inaccuracies in your article. The reasoning behind the Commission decision is spelled out in great detail in various Commission briefing packages. Far from yielding to any "pressure from the apparel industry" as your article states, the Commission began its review of the sleepwear standards to counter the makers of cotton underwear who were manufacturing, and sometimes marketing, cotton underwear garments in such a way as to encourage their use as sleepwear. Those garments did not comply with the original sleepwear standards (and they would not comply with the current sleepwear standards). Our enforcement division began taking case by case action against these companies, but it was often difficult to prove that a garment that looked very much like sleepwear, and could obviously be used as sleepwear, but was labeled as "underwear" was in violation of our sleepwear standard.

Our primary concern was whether children were being endangered by sleeping in these garments. But, when our staff did its analysis of injuries and deaths related to clothing fires, they found no evidence that the cotton underwear garments, when used as sleepwear, presented an unreasonable risk of injury to children. (We can't prevent every risk. Even the flame-resistant garments that meet the flammability tests of the sleepwear standard don't prevent all burns—the garments are not fire proof.) In fact, staff found no injuries or deaths associated with the cotton underwear garments at all. This, of course, called into question the future of our entire enforcement effort in this area.

Staff then proceeded to study the issue of whether and what cotton garments might be appropriate for sleepwear. After analyzing the technical studies on the subject and looking at the data in other countries where children's sleepwear can be made from cotton, the staff proposed a garment that had to fit the body at seven key points. As a practical matter, it is a tight-fitting garment that has to be made from material that stretches to fit the body but has good return (i.e., does not stretch out of shape). It is also a garment that has been vilified by many members of the apparel industry. They want a looser-fitting garment, but the Commission just recently voted to deny any increase in the sizing of the garments. If the Commission had taken action to please the apparel industry, it would have permitted the use of the garments the industry wanted to sell. A reversal of the sleepwear amendments would put us back where we were before, there would be no tight-fitting cotton garments labeled as sleepwear, but there would be looser-fitting cotton underwear being used as sleepwear skirting our regulations and over which we would have little control.

In your article you state that according to the CPSC, close to 300 children suffer burn injuries each year while wearing sleepwear. This statement is a bit misleading as most of those injuries (about 200) involve daywear used as sleepwear. As part of the Commission's analysis of data for the proposed sleepwear amendments, cases were reviewed covering the period 1980 to 1994. Only 20 actual burn injuries to children associated with sleepwear were reported during that period, but based on those reports, Commission staff estimated that there are an annual average of 90 sleepwear-related injuries treated in hospital emergency rooms. (This is compared to an annual average of 850 burns to children associated with daywear.) When the staff looked more closely at the 20 sleepwear cases, it found that virtually all of the garments involved were loose-fitting garments--nightgowns, loose-fitting pajamas, and nightshirts. During 1994, staff investigated every relevant sleepwear case that was reported to CPSC. The staff estimated that there were about 200 burn injuries treated in hospital emergency rooms during 1994 that involved **daywear used as sleepwear**. Staff found no evidence implicating tight-fitting cotton garments in burn injuries to children.

It should be emphasized that the Commission only allowed one style of sleepwear to be made from cotton. Under the amended Standards, the styles that most put children at risk, such as nightgowns, robes, nightshirts, man-tailored pajamas, and loose fitting polo/ski pajamas **must** still be made from flame-resistant fabrics.

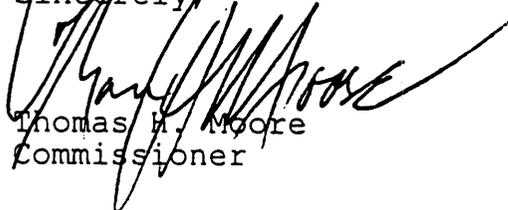
Your article also indicated that the manufacturers and retailers have been unable to agree on cautionary labels and on how to measure and define tight-fitting. The industry and the Commission staff have worked together to produce

informational material, including hangtags for garments which identify them as being either flame-resistant, or not flame-resistant and therefore required to be tight-fitting. It is my understanding that most, if not all, manufacturers of the tight-fitting cotton sleepwear garments are using the approved hangtag to alert buyers to the need to buy the appropriate size. And a number of retailers have posters and other information in their sleepwear departments to inform parents of the safe alternatives for children's sleepwear. Other than some technical changes which describe more accurately where garment measurements should be made, the Commission has not altered its definition of tight-fitting garments. It is the Commission that decides if a garment meets that definition, not the retailers or the manufacturers.

The Commission is a data and science driven agency. Based on our research, we do not believe these garments will pose an unreasonable risk. Congress has recently mandated that the Commission review the data on sleepwear injuries once again. That review will take place early this year. To date we know of no injuries involving small flame ignition of tight-fitting cotton sleepwear.

I hope this clarifies the Commission's action.

Sincerely,



Thomas H. Moore  
Commissioner

CY99-1-14



CLARKSON HOSPITAL • UNIVERSITY HOSPITAL

*A Partner with University of Nebraska Medical Center*

February 17, 1999

Office of the Secretary  
Consumer Product Safety Commission  
Washington DC 20207

Re: Children's Sleepwear Standards

I write to you as a burn center director dealing with children who have been victimized by flammable fabric sleepwear and clothing. The existing standards have had a positive influence on the reduction in the size and severity of infant and children sleepwear burns.

Relaxation of the standards will have the same impact on the incidence of burns as has the relaxation of speeding guidelines by the states and the Department of Transportation on injury upon the highways, namely increased numbers of burn and trauma injuries and increased incidence of fatalities from these actions.

A member of the American Burn Association and the director of the Shriner's Burn Centers Hospital in Galveston, Texas, Dr. David Herndon will be coming to your meeting to expose to the members the impact of pediatric burns and the serious effect these relaxed standards have imposed on the infants and children in the United States of American.

I appeal to you to listen to the American Burn Association representative and to repeal these relaxed standards.

Sincerely,

Robert W. Gillespie, M.D., F.A.C.S.

Medical Director

Burn Center

RWG/bjm

C.F.99-1-15



## American Burn Association

February 17, 1999

Office of the Secretary  
Consumer Product Safety Commission  
Washington DC 20207

Re: Children's Sleepwear Standards

I write to you as Chairman of the Federal Issues Committee to voice strong concern regarding the proposed relaxation of the Children's Sleepwear Flammability Standards. Re-establishment of the original standards would provide protection for thousands and thousands of infants and children from fire hazards. Infants and children are both vulnerable; infants because they are so dependent upon parents and care givers for protection and removal from a source of flame and children because of the misconception that tight-fitting sleepwear will not ignite and is a serious hazard to the child.

The Federal Issues Committee of the American Burn Association with its membership and burn center hospitals, as well as the fire services at the state, urban and rural levels takes this opportunity to alert the Commission to the serious effects of these relaxed standards.

Sincerely,

A handwritten signature in black ink, appearing to read "R. W. Gillespie".

Robert W. Gillespie, MD  
Chairman, Federal Issues Committee  
American Burn Association

 **Regions Hospital**<sup>SM</sup>  
Emergency Center

640 Jackson Street  
St. Paul, MN 55101-2595  
(612) 221-3311  
(612) 221-8756 Fax

February 19, 1999

Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20207

**RE: Sleepwear Revocation**

Dear Secretary/Consumer Product Safety Commission:

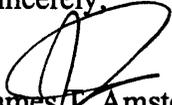
I strongly support the proposed revocation by the Consumer Product Safety Commission (CPSC) of the relaxed flammability standards for children's sleepwear. This action would reinstate the previous, stricter CPSC standards for children's sleepwear flammability-standards that are needed to help prevent death and disfigurement for hundreds of our nation's infants and young children.

- Bum injuries and deaths are preventable, and safe sleepwear for infants and young children is a critical part of any prevention initiative. In particular, infants younger than 9 months are dependent on others to protect them from danger-they are generally incapable of removing themselves from the fire source if ignition should occur, and cannot "stop, drop, and roll" if clothing catches fire. Moreover, those infants that *are* mobile at this age are at risk of exposure to ignition sources. We must be diligent in ensuring that this extremely vulnerable group is adequately protected. Revocation of the relaxed flammability standards will help ensure this outcome.
- The revocation of the relaxed flammability standard for snug-fitting sleepwear is just as important to our children's safety. While tight-fitting sleepwear is less likely to come in contact with a flame or other ignition source, the garment must be nearly skintight, and tight at the wrists, ankles, waist and other key points for it to be a "safer choice." Furthermore, parents often acquire such sleepwear either by purchasing or through "hand-me-downs"-that is larger than the child currently wears. If the garment is purchased large, allowing room for a child to "grow into it," the purpose of tight-fitting, from a burn safety perspective, has been defeated. It is also questionable whether tight fit will compensate for the increased dangers associated with a more flammable material such as cotton.
- Available injury and death data suggest that the more stringent flammability standards in effect prior to the September 1996 relaxation by the CPSC were clearly working. There have been fewer injuries or deaths involving ignition of children's sleepwear since enactment of the standard nearly twenty-five years ago. This low level of injuries and deaths can primarily be attributed to the more stringent, previously established flammability standards.

As a member of the health care profession, an emergency physician who must deal with the

pain, suffering, and cost of burn injuries on a daily basis, I strongly support the proposed revocation of the relaxed flammability standards for children's sleepwear. It *can* make a difference in the prevention of death and disfigurement for our nation's children.

Sincerely,



James T. Amsterdam, DMD, MD, MMM, FACEP  
Head, Emergency Medicine Department

Professor of Clinical Emergency Medicine  
University of Minnesota

 **Regions Hospital**<sup>SM</sup>  
*The Burn Center*

640 Jackson Street  
St. Paul, MN 55101-2595  
(651) 221-2810  
(651) 221-4359 Fax

Consumer Product Safety Commission  
Office of the Secretary  
Washington, DC 20207

**RE: Sleepwear Revocation**

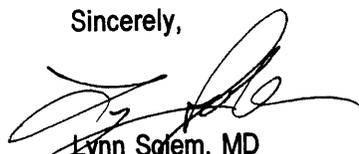
To Whom it May Concern:

I strongly support the proposed revocation by the Consumer Product Safety Commission (CPSC) for the relaxed flammability standards for children's sleepwear. These actions would reinstate the previous and more strict CPSC standards for children's sleepwear flammability. More strict standards are needed to help prevent death and disfigurement for hundreds of our nations infants and young children.

- A vast majority of burn injuries and deaths are preventable. Safe sleepwear for infants and young children is a critical part of the burn prevention initiative. In particular, young infants are dependent of others to protect them from danger. They are unable to remove themselves from fire. In addition, these infants are very mobile and place themselves at risk of exposure to ignition sources. We must insure that these extremely vulnerable children are adequately protected. Revocation of the relaxed flammability standards will help insure this protection.
- Revocation of the relaxed flammability standard for snug fitting sleepwear is just as just important to our children's safety. Tight fitting sleepwear is less likely to come in contact with an ignition source, the garment must be nearly skin tight and tight at the wrist, ankles, and other key points for it to be a "safer choice." Additionally, parents often acquire such sleepwear from friends, family, or by hand-me-downs and the sleepwear is larger than the child currently wears. When the larger garment is utilized, the purpose of a tight fitting garment (from a burn safety perspective) has been defeated. It is also questionable whether tight fit compensates for the increased dangers associated with more flammable materials such as cotton.
- Injury and death data suggest that the more stringent flammability standards and in effect prior to the September 1996 relaxation by the CPSC were clearly working. There had been fewer injuries and deaths involving children's sleepwear since enactment of the standard nearly 25 years ago. The low level of injuries and deaths can primarily be attributed to the more stringent flammability standards.

As a member of the health care profession and director of a burn center for nearly 20 years, I must deal with the pain, suffering, and cost of children's burn injuries on a daily basis. I strongly support the proposed revocation of the relaxed flammability standards for children's sleepwear. It can make a difference in the prevention of death and disfigurement for our nation's children.

Sincerely,

  
Lynn Sofem, MD  
Burn Center Director

CF99-1-17

---

**BURN  
TRAUMA  
UNIT**

---

St. Luke's Regional Medical Center

February 22, 1999

Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20207

RE: SLEEPWEAR REVOCATION

My name is Deb Motz. I am a registered nurse working in the Burn Trauma Center at St. Lukes Regional Medical Center in Sioux City, Iowa. I have cared for burn patients for the past 21 years and am the founder of our Burn K.N.O.T. (Kids Need On-going Teaching) juvenile firesetter program. This program was implemented in 1988 as a result of the high number of calls we received from parents regarding their children's fascination with fire. Children **ARE** fascinated with fire and often are found playing with matches and/or lighters in their closets or in their bedrooms when they are supposed to be napping. Many times fires start as a result of this fireplay. As someone who knows the devastating injury of a burn, I am writing because I strongly support the proposed revocation of the Consumer Product Safety Commission (CPSC) of the relaxed flammability standards for children's sleepwear. This action would reinstate the previous, stricter CPSC standards for children's sleepwear flammability--standards that are needed to help prevent death and disfigurement for hundreds of our nation's infants and young children.

Burn injuries and deaths **are preventable**, and safe sleepwear for infants and young children is a critical part of any prevention initiative. In particular, infants younger than 9 months are dependent on others to protect them from danger--they are generally incapable of removing themselves from the fire source if ignition should occur and cannot "stop, drop, and roll" if clothing catches fire. These infants **ARE** mobile at this age and risk exposure to ignition sources. We must be diligent in ensuring that these extremely vulnerable children are adequately protected. Revocation of the relaxed flammability standards will help ensure this outcome.

The revocation of the relaxed flammability standard for snug-fitting sleepwear is just as important to our children's safety. While tight-fitting sleepwear is less likely to come in contact with a flame or other ignition source, the garment must be nearly skintight for it to be a "safer choice".

2720 Stone Park Boulevard  
Sioux City, Iowa 51104  
(712) 279-3440

---

Furthermore, in order to alert our community about the dangers of cotton sleepwear, our local fire department demonstrated the difference in ignition of cotton VS flame resistant sleepwear. The demonstration was unbelievable. The cotton sleepwear flamed up and burned very quickly. This would most likely result in severe facial and upper body injuries. The flame resistant sleepwear took much longer to ignite, even when the lighter was held to it for quite some time and once the ignition source was removed, the fabric quit burning and extinguished itself.

Available injury and death data suggest that the more stringent flammability standards in effect prior to the September 1996 relaxation by the CPSC were clearly working. There have been fewer injuries and deaths involving ignition of children's sleepwear since enactment of the standard nearly twenty-five years ago. This low level of injuries and deaths can primarily be attributed to the more stringent, previously established flammability standards.

As a member of the Burn Trauma Team for over 20 years who must deal with the pain, suffering, disfigurement and cost of burn injuries on a daily basis, I strongly support the proposed revocation of the relaxed flammability standard for children's sleepwear. It can make a difference in the prevention of death and disfigurement for our nation's children.

Sincerely,



Deb Motz RN, BSN, MS  
Clinical Coordinator, Burn Trauma Center

---

# BURN TRAUMA UNIT

---

St. Luke's Regional Medical Center

February 22, 1999

Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20207

RE: SLEEPWEAR REVOCATION

My name is Larry Foster. I am the medical director of the Burn Trauma Center at St. Lukes Regional Medical Center in Sioux City, Iowa. I have cared for burn patients for the past 21 years. As someone who knows the devastating injury of a burn, I am writing because I strongly support the proposed revocation of the Consumer Product Safety Commission (CPSC) of the relaxed flammability standards for children's sleepwear. This action would reinstate the previous, stricter CPSC standards for children's sleepwear flammability--standards that are needed to help prevent death and disfigurement for hundreds of our nation's infants and young children.

Burn injuries and deaths are preventable, and safe sleepwear for infants and young children is a critical part of any prevention initiative. In particular, infants younger than 9 months are dependent on others to protect them from danger--they are generally incapable of removing themselves from the fire source if ignition should occur and cannot "stop, drop, and roll" if clothing catches fire. These infants are mobile at this age and risk exposure to ignition sources. We must be diligent in ensuring that these extremely vulnerable children are adequately protected. Revocation of the relaxed flammability standards will help ensure this outcome.

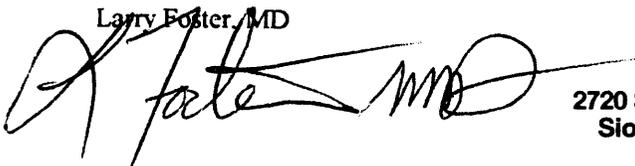
The revocation of the relaxed flammability standard for snug-fitting sleepwear is just as important to our children's safety. While tight-fitting sleepwear is less likely to come in contact with a flame or other ignition source, the garment must be nearly skintight for it to be a "safer choice". Further, in order to alert our community about the dangers of cotton sleepwear, our local fire department demonstrated the difference in ignition of cotton VS flame resistant sleepwear. The demonstration was unbelievable. The cotton sleepwear flamed up and burned very quickly. This would most likely result in severe facial and upper body injuries. The flame resistant sleepwear took much longer to ignite, even when the lighter was held to it for quite some time and once the ignition source was removed, the fabric quit burning and extinguished itself.

Available injury and death data suggest that the more stringent flammability standards in effect prior to the September 1996 relaxation by the CPSC were clearly working. There have been fewer injuries and deaths involving ignition of children's sleepwear since enactment of the standard nearly twenty-five years ago. This low level of injuries and deaths can primarily be attributed to the more stringent, previously established flammability standards.

As a member of the Burn Trauma Team for over 20 years who must deal with the pain, suffering, disfigurement and cost of burn injuries on a daily basis, I strongly support the proposed revocation of the relaxed flammability standard for children's sleepwear. It can make a difference in the prevention of death and disfigurement for our nation's children.

Sincerely,

Larry Foster, MD



2720 Stone Park Boulevard  
Sioux City, Iowa 51104  
(712) 279-3440

---



Wayne State University  
Children's Hospital  
of Michigan

RECEIVED BY THE SECRETARY  
1999 FEB 23 A 11:23

Ann Marie Ahee, RN  
Burn Research Nurse  
Pediatric General Surgery  
3901 Beaubien  
Detroit, MI 48201

Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20207

**RE: Sleepwear Revocation**

I strongly support the proposed revocation by the Consumer Product Safety Commission (CPSC) of the relaxed flammability standards for children's sleepwear. This action would reinstate the previous, stricter CPSC standards for children's sleepwear flammability - standards that are needed to help prevent death and disfigurement for hundreds of our nation's infants and young children.

Burn injuries and deaths are preventable, and safe sleepwear for infants and young children is a critical part of any prevention initiative. In particular, infants younger than 9 months are dependent on others to protect them from danger. They are generally incapable of removing themselves from the fire source if ignition should occur, and cannot "stop, drop and roll" if clothing catches on fire. Moreover, those infants that are mobile at this age are at risk of exposure to ignition sources. We must be diligent in ensuring that this extremely vulnerable group is adequately protected. Revocation of the relaxed flammability standards will help ensure this outcome.

The revocation of the relaxed flammability standard for snug-fitting sleepwear is just as important to our children's safety. While tight-fitting sleepwear is less likely to come in contact with a flame or other ignition source, the garment must be nearly skintight, and tight at the wrists, ankles, waist and other key points for it to be a "safer choice". Furthermore, parents often acquire such sleepwear - either by purchasing or through "hand-me-downs" that is larger than the child currently wears. If the garment is purchased large, allowing room for a child to "grow into it", the purpose of tight-fitting, from a burn safety perspective, has been defeated. It is also questionable whether tight fit will compensate for the increased dangers associated with a more flammable material such as cotton.

Available injury and death data suggest that the more stringent flammability standards in effect prior to the September 1996 relaxation by the CPSC were clearly working. There have been fewer injuries or deaths involving ignition of children's sleepwear since enactment of the standard nearly twenty-five years ago. This low level of injuries and deaths can primarily be attributed to the more stringent, previously established flammability standards.

As a member of the burn team at Children's Hospital of Michigan who must deal with the pain, suffering, and cost of burn injuries on a daily basis, I strongly support the proposed revocation of the relaxed flammability standards for children's sleepwear. It can make a difference in the prevention of death and disfigurement for our nation's children.

Sincerely,

Ann Marie Ahee, RN



CF99-1-19

**THE UNIVERSITY OF IOWA  
HOSPITALS AND CLINICS**

Appointments 319/356-2902  
FAX 319/356-3392

Department of Surgery  
Division of General Surgery  
200 Hawkins Drive  
Iowa City, Iowa 52242-1086



**Section of Trauma,  
Burns, and Critical Care**

Director  
G Patrick Kealey, MD, FACS, FCCM  
356-3221  
Lori J Morgan, MD  
384-9840  
Carol EH Scott-Conner, MD, PhD, FACS, FCCM  
356-0330  
Siros S Shirazi, MD, FACS  
356-2006  
Suehla Smith, MD  
356-2672  
Luis F Urdaneta, MD, FACS  
353-6328  
Lucy A Wibbenmeyer, MD,  
356-3551  
Trauma Nurse Coordinator  
Michele Alpen, RN, MA, CEN  
356-1661

February 24, 1999

Re: Revocation of amended flammability standards for  
children's sleep wear

Office of the Secretary  
Consumer Product Safety Commission  
Washington D.C. 20207

Dear Sir,

I am Dr. Gerald Patrick Kealey, the medical director of the Burn Treatment Center at the University of Iowa Hospitals and Clinics and professor of surgery at the University of Iowa College of Medicine. I am also the director of the Trauma Services at this hospital. In this capacity, I take care of the majority of burned children in the state of Iowa. I support revocation of the amended flammability standard for children's sleep wear.

I take this stand because I have been involved in the care of burned children since 1972. It was very common prior to the institution of flammability standards for children's sleep wear to see tragic burn injuries in children under five years of age due to ignition of flammable sleep wear. Since the institution of improved flammability standards, we no longer see children wearing such sleep wear incurring such injuries. In fact, the only children we see with burn injuries are those who were not wearing such flame retarded sleep wear. These include young children wearing T-shirts and other flammable clothing while sleeping. I myself have noted that flame retarded sleep wear has protected individual children who have burns of the exposed portions of their bodies while those areas covered by the flame retarded clothing have not been injured. Nationwide, the incidence of mortality has significantly declined in the age group of children under four years of age subsequent to the institution of improved flammability standards for children's sleep wear.

I would like to point out to you the contention that you have no data concerning increased burn injury since 1996 is unrealistic. It takes time for these decisions to get into the marketplace and for the sleep wear to reach the consumers. At this time, we are seeing T-shirts used as sleep wear and subsequent burn injuries to children, due to ignition of such clothing. It makes little or no sense from an epidemiologic perspective to change a safe situation when no data is available concerning the impact of change in flammability standards in a very vulnerable age group.

It is my firm conviction that the 1996 children's sleep wear flammability standards are not in the best interests of the children who will be wearing them. Therefore, I strongly urge the re-institution of the old flammability standards for children's sleep wear. We have a moral obligation to provide the safest consumer products possible in order to avoid the tragedy of unnecessary burn injuries at any age, and especially in vulnerable young children.

I look forward to your reply. Please contact me at your earliest convenience.

Respectfully,

G.P. Kealey, M.D.  
Professor of Surgery, University of Iowa College of Medicine  
Director, Burn Treatment Center, University of Iowa Hospitals and Clinics  
Director, Trauma Center, University of Iowa Hospitals and Clinics



February 22, 1999

Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20207

**Re: Sleepwear Revocation**

I strongly support the proposed revocation by the Consumer Product Safety Commission (CPSC) of the relaxed flammability standards for children's sleepwear. This action would reinstate the previous, stricter CPSC standards for children's sleepwear flammability-standards that are needed to help prevent death and disfigurement for hundreds of our nation's infants and young children.

In 1996, when the CPSC voted to relax the sleepwear standards and allow non-flame resistant garments to be sold in sizes 0 to 6x as long as the garment is tight-fitting, I am assuming that the assumption was that parents would be safety conscience and put their infants in tight fitting garments. To this end, an extensive public awareness and education campaign was to be developed to educate consumers and sales personnel about the changes. To my knowledge, this education has not been done. As Prevention Education Director of the Alisa Ann Ruch Burn Foundation, I know first hand the mentality of the general public is for the most part not as safety conscious as they need to be. While tight-fitting sleepwear is less likely to come in contact with a flame or other ignition source, the garment must be nearly skintight, and tight at the wrists, ankles, waist and other key points for it to be a safer choice. Parents like the softness of cotton, when they can, hand down night wear from one child to another, and tend to buy clothing large enough to "grow into".

Available injury and death data suggest that the more stringent flammability standards in effect prior to the September 1996 relaxation by the CPSC were clearly working. There have been fewer injuries or deaths involving ignition of children's sleepwear since enactment of the standard nearly twenty-five years ago. This low level of injuries and deaths can primarily be attributed to the more stringent, previously established flammability standards. Again, as a staff person for the Burn Foundation for the past 16 years, I am intimately involved in the aftermath of a serious burn injury. The pain, parental guilt, destroyed families and a life time of scars, both emotional and psychological is reason enough to do everything in our power to keep our children safe from a serious burn injury. I strongly support the proposed revocation of the relaxed flammability standards for children's sleepwear. It can make a difference in the prevention of death and disfigurement for our nation's children.

Sincerely,

Stephanie Knizek  
Prevention Education Director

*Dedicated to Survivor Assistance & Burn Prevention*

February 25, 1999

Office of the Secretary  
Consumer Product Safety Commission  
Washington, D.C. 20207

Subject: Sleepwear Revocation

My name is Michelle Staggs. I am the Chief Flight Nurse and Trauma Registry Coordinator for Baptist MedFlight/Baptist Medical Center in Little Rock, Arkansas. I have also been an Emergency Nurse for nearly 12 years; I am the current chair of the Arkansas Emergency Nurses Association Government Affairs Committee and the President-elect for our state's Association. Recently I learned that you were considering changes in the requirements for children's sleepwear. I support revocation of the amended flammability standards for children's sleepwear.

Based upon my experience, I am incredulous that you would even consider removing the flammability protection requirement for any age child much less infants in the 0 to 9 month age range. One of the most vulnerable periods in a child's life is this particular age range; infants are totally dependent but become quite mobile as they approach the 9 month age. An assumption that they are immobile thus allowing removal of the standards is extremely dangerous.

In addition, exempt standards for snug-fitting sleepwear for sizes 9 months through age 14 is equally if not more dangerous. While the intent may have been appropriate, the result for children and their parents has been a total lack of knowledge regarding the dangers of loose-fitting clothing for sleepwear as evidenced by the number of children I've seen who use adult T-shirts as sleepwear. Especially prone populations such as the lower socioeconomic groups purchase children's clothing on the second-hand market which does not have any packaging which might educate them to the dangers of loose fitting sleepwear. Rather than lowering the safety standard for children's sleepwear, a more targeted education campaign to address specific issues such as the risk for T-shirt burns might be more effective in accomplishing a safer environment for our children.

Finally, the argument that there has been no increase in burn injuries or fatalities as the result of the relaxed standard is much too premature. Much of the implementation of the standard changes by the manufacturers had not been completed until the past few months. To collect the data to prove the ineffectiveness of the amended standards would put the children of our country at risk for many more years; in my opinion, we do not have the luxury nor the right to risk even one child's life to refute the standard. Please, re-evaluate and assist in protecting our children through planning and education and revoking the 1996 amendments and reinstating the old flammability standard.

Sincerely,



Michelle Staggs, R.N., CCRN, CEN, TNS, NREMT-A/Instructor

Wendy Nivison, R.N., B.S.N., C.E.N  
Chairperson, Government Affairs Committee  
Maine Emergency Nurses Association  
4 Warren Terrace  
Winslow, ME. 04901  
February 26, 1999

Office of the Secretary  
Consumer Product Safety Commission  
Washington, D.C. 20207

The subject of my letter is the revocation of sleepwear amendments.

I am the chairperson of government affairs for the Maine Emergency Nurses Association, an organization in Maine that represents over 220 nurses. I work clinically in a rural, community hospital emergency department that sees approximately 40,000 patients a year.

I strongly urge the commission to revoke the amended flammability standards for children's sleepwear that were passed in 1996. The CPSC has continued to state that since its decision there has been no data showing burn injuries or fatalities as a result of the relaxed standard. It is much too soon for such data to emerge, the difficult snug-fitting standard has only been finalized for manufacturers in the past two months; individual or anecdotal cases are more likely, but very difficult to find. Even so, just one case should be enough to change the vote of the CPSC Commissioners. Relaxing the sleepwear standard does not address T-shirt burn injuries. T-shirt burn injuries need to be addressed in a more direct manner and without diminishing existing safety standards for sleepwear.

Therefore, I strongly support revocation of the 1996 amendments and reinstatement of the old flammability standard. Thank you for your time.

Sincerely,

*Wendy Nivison, R.N.*

Wendy Nivison, R.N.

CF99-1-23



February 15, 1999

Office of the Secretary  
Consumer Product Safety Commission  
Washington, DC 20207

1056 East 19th Avenue  
Denver, Colorado 80218

(303) 861-8888

RE: Sleepwear revocation

Dear Mr. Secretary:

Over the past 20 years burn injuries resulting from the ignition of children's sleepwear has steadily declined. The fabric flammability standards established in the 1970's played a large role in the decline of these injuries. With the 1996 US Consumer Product Safety Commission decision to relax the standards, we are concerned that our patient's (infants and children) are at greater risk for burn injuries.

Burn injuries and deaths are preventable. Safe sleepwear for infants and young children is a critical component to any prevention initiative. In particular, infants are dependent on others to protect them from danger. Infants age nine months or younger are incapable of removing themselves from a fire source and cannot "stop, drop, and roll." Infants that are mobile are at risk for exposure to ignition sources. We believe it is extremely important to be diligent in ensuring that this highly vulnerable group is adequately protected. Revocation of the relaxed flammability standards will help to ensure this outcome.

The revocation of the relaxed flammability standard for snug-fitting sleepwear is equally important. While tight fitting sleepwear is less likely to come in contact with an ignition source, the garment must be nearly skintight. It would have to be tight at the wrists, ankles, waist and other key points for it to be a "safer choice". The reality is that parents will often purchase or use garments that are slightly larger than the desired size allowing the child to "grow into" the garment. Thus the purpose of the tight fitting garment from a burn safety perspective has been defeated.

Available data on burn injuries and deaths suggest that the more stringent flammability standards in effect prior to the CPSC relaxation standards of September 1996, were clearly working. There have been fewer injuries or deaths involving ignition of children's sleepwear since enactment of the standard nearly 25 years ago. This low level of injuries and deaths can primarily be attributed to the more stringent, previously established flammability standards.

In our experience at The Children's Hospital in Denver, we have seen a variation in depth of burn injuries related not only to sleepwear, but all children's clothing. Clothing with appliques and polyester will melt to the skin causing significant injuries. It would be our

Office of the Secretary  
February 15, 1999  
page two

goal to see the flammability standards for sleepwear and all children's clothing be as protective as possible for the benefit of children. In examining the amount of pain and disfigurement, as well as the cost related to children who suffer a burn injury, we urge you to revoke the relaxed standards. It can and does make a difference in preventing injury, disfigurement, and death to children. We must be their advocates in this endeavor.

Sincerely,

David P. Meyhe, Jr. M.D.  
Burn Surgeon  
Marion E. Doctor, LCSW  
Judith B. Hackenamp, OTR/CHT  
Debbie J. Jones  
Margaret Smith, RN, MSW  
Kathy D. Knapp  
Lawrence V. Jellison, M.D., FAAP  
Jeanne Eden, Ph.D.  
Pediatric psychologist

The Children's Hospital Burn Team  
Denver, Colorado

cc: American Burn Association  
Trauma Team, The Children's Hospital

CF99-1-24

Author: "Debra Reilly M.D." <dreilly@surgery.usc.edu> at INTERNET-MAIL  
Date: 2/24/99 2:34 PM  
Priority: Normal  
TO: cpsc-os@cpsc.gov at internet-mail  
CC: mmabee@ix.netcom.com at internet-mail  
BCC: Todd A. Stevenson at CPSC-HQ1  
Subject: Sleepwear Revocation

I write this letter in opposition to the 1996 amendments which relaxed the standards for sleepwear flammability.

I am currently one of four plastic surgeons working at the Los Angeles County +University of Southern California Burn Unit and am Director of Burn Reconstruction at the Rancho Los Amigos Medical Center, also in LA. I have spent the past 20 years studying, treating and trying to prevent burn injuries to adults and children.

Many of the preventable injuries I have encountered during this time have dealt with people burned when their clothing ignited. Some clothing was sleepwear and other clothing was worn as sleepwear. As part of my desire to decrease pain and suffering among my patient population support revocation of the amended flammability standards for children's sleepwear.

Although I recognize that you are trying to satisfy a large economic concern by providing laws which will cheapen product manufacture and increase their profits, I strongly feel that this new relaxation of flammability standards will lead to even more injury from burning clothing, more admissions to hospitals, more cost to the American health care system and more pain and suffering for the American people.

I could site numerous examples of children innocently burned by their overly flammable clothing. DC was a 9 year old boy who was burned when his bedroom caught fire. He did as he was taught in school, dropped to the floor and crawled through the smoke, away from the fire and out to safety. Unfortunately the loose, baggy pants he was wearing for sleeping caught fire from some flying cinders and ignited. He sustained a 20% total body surface area third degree burn and required skin excision and split thickness skin grafting. He is now spending the first of two years in pressure garments.

Many of our parents do not realize that the clothing choices they make for their children might be dangerous. I feel it is up to the clothing manufacturers to help provide safe clothing for persons at risk. This includes all children (not just the under 9 month old) and especially includes the clothing they will wear to sleep in - a time when many house fires occur.

Similar laws exist to protect consumers before they purchase other products e.g. size of parts on toys that need to be "too" big to be swallowed before considered safe for a young age group.

By enacting these new relaxed flammability laws you are doing the children of America a great disservice. Please instead make a difference in their lives and restore the older, stronger standards and better protect our infants and children from devastating burn injuries and the psychological sequelae of the burn trauma. Revoke the 1996 amendments.

Debra Ann Reilly, MD  
Assistant Professor of Surgery  
University of Southern California  
Department of Surgery, Division of Burn and Plastic Surgery





CF99-1-26

CPSC/DFC OF THE SECRETARY  
FREEDOM OF INFORMATION  
1999 MAR -3 P 3:05

**COUNTY OF ALBEMARLE**  
**FIRE & RESCUE ADMINISTRATION**  
401 McIntire Road  
Charlottesville, Virginia 22902-4596  
Tel: (804) 296-5833  
Fax: (804) 972-4123

March 1, 1999

Ms. Sadye E. Dunn, Secretary  
Consumer Product Safety Commission  
4330 East-West Highway, Room #502  
Bethesda, MD 20814

Re: Sleepwear Revocation

Dear Ms. Dunn,

We are writing to urge the Consumer Product Safety Commission to revoke its 1996 amendments to the Flammable Fabrics Act and return to the stronger fire safety standards, which kept children safe for more than twenty-five years.

As you know, after passage of the strict fire safety standard, the number of children suffering from burns dropped dramatically. In fact, the National Fire Protection Association estimates that without this standard, there would have been ten times as many deaths, and substantially more injuries, associated with children's sleepwear. Clearly it is a protection that worked.

Some argue that there has been no increase in the number of burn injuries and deaths since the standard changed. This is partially due to problems in reporting of burn injuries. Furthermore, we do not believe that we should wait for children to be injured before we return to a standard, which worked for decades. There are several problems with the new standards that we believe will put America's children in danger in the future.

The revised standard, which exempts "tight-fitting" sleepwear in children's sizes up to 14, is based on the assumption that parents will dress their children in tight clothes. Anyone who has bought clothing for a child knows you do not buy something that fits tightly -- you buy something big enough for the child to grow in to. Many parents dress their children in hand-me-downs, which may be far too big for the child. The combination of non-flame-resistant material and large, baggy clothing can be lethal.

The revised standard which exempts sleepwear for infants nine months and younger from any fire safety regulations is even more dangerous. Many infants at this age are crawling, and should they somehow become exposed to a flame, would be completely vulnerable. Infants deserve more protection not less.

The CPSC's decision to relax the fire safety standard was made with the understanding that the manufacturers' would fund a substantial public awareness campaign so that consumers would understand the importance of dressing their children in tight-fitting clothes. This campaign has not materialized.

Furthermore, the tags which are supposed to let parents know a garment is not flame resistant are difficult to understand, and are almost uniformly written in English -- making it impossible for Spanish-speaking parents to understand that a garment is not flame resistant.

We have the utmost respect for the Consumer Product Safety Commission. The CPSC is the premier agency for protecting our children's safety. Parents look to you to help them ensure their children grow up happy and healthy. We urge you not to send parents the wrong message. Please return to the strict fire safety standard, which was in place until 1996. Please do not wait until the number of children burned begins to rise before you act to protect them. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark K. Spicer', with a long horizontal line extending to the right.

Mark K. Spicer  
Assistant Fire Marshal

MKS/ed

cc: sleepwear.doc



# American Public Health Association

1015 Fifteenth Street, N.W. • Washington, D.C. 20005-2605  
202/789-5600; Fax: 202/789-5661 • e-mail: [comments@msmail.apha.org](mailto:comments@msmail.apha.org) • <http://www.apha.org>

February 22, 1999

Thomas Hill Moore  
Commissioner  
Consumer Product Safety Commission  
4330 East West Highway  
Bethesda, MD 20814

Dear Commissioner Moore:

Thank you for your letter of January 25 regarding the issue of children's sleepwear. Because we always strive to represent complex policy issues to our members fairly, your concerns and comments are very helpful to us.

Specifically, we appreciate and regret the differences in your and our interpretations of the Commission's decision to repeal the national anti-flammability standard for children's sleepwear. We certainly respect that reasonable people may come to different conclusions from the same set of information. Several reliable sources have characterized to us that cotton industry members advocated actively for a repeal of the standard; anticipating that our members would ask us why the standard was changed, we pre-emptively summarized our understanding of these events in our January e-mail. Given your concerns about this characterization, however, we will certainly re-double our efforts to be fair and unbiased in our conclusions.

Additionally, we appreciate your suggestion that our call for burn incident reports would have been more helpful had it been more specific. In fact, we considered this issue ourselves before sending the January action alert. I am sure you can appreciate that our members have a limited amount of time for reading correspondence; thus, they urge us to be brief in our alerts. For this reason, we decided that our most important role was to alert our members to the fact that data-gathering was taking place and to direct them to the entities collecting the information. We leave it to the discretion of the Commission and the General Accounting Office to sort through any reports they may receive. It is conceivable that a report may come in that is beyond the scope of consideration, but we found that possibility preferable to the alternative in which a relevant piece of data is missed because the "holder" of the information did not take the time to read through a very long, detailed and somewhat technically complex alert. We acknowledge there is a natural opposition in form between detailed description and brevity of communications; in this area too, we will re-double our efforts to achieve proper balance between the two.

Commissioner Thomas Hill Moore  
February 22, 1999

In conclusion, we thank you again for your comments and suggestions. We consider ourselves partners in the effort to protect children from unsafe products and are very grateful for your attention to this issue. In response to your specific request, we plan to note your first point in a pending communication with APHA members who received our January action alert. We hope this satisfies your concerns and again, thank you for your thoughts.

Best Wishes,



Donna Crane  
Director of Congressional Affairs

cc: Mary Wallace, Director of Government Relations and Affiliate Affairs  
dc\moore.299



United States  
CONSUMER PRODUCT SAFETY COMMISSION  
Washington, D.C. 20207

OFFICE OF COMMISSIONER MOORE

March 8, 1999

Donna Crane  
Director of Congressional Affairs  
American Public Health Association  
1015 Fifteenth Street, N.W.  
Washington, D.C. 20005-2605

Dear Ms. Crane:

Thank you for your response to my letter on the Children's Sleepwear Standards.

I would just like to reiterate, that no member or representative of the cotton industry ever approached me or my staff about repealing the Standards. We did have public meetings with sleepwear manufacturers and representatives of various interested groups who commented on the staff proposal to amend the Standards, after the rulemaking proceeding had begun. My recollection is that more of those meetings were with parties who did not want any changes made to the Standards.

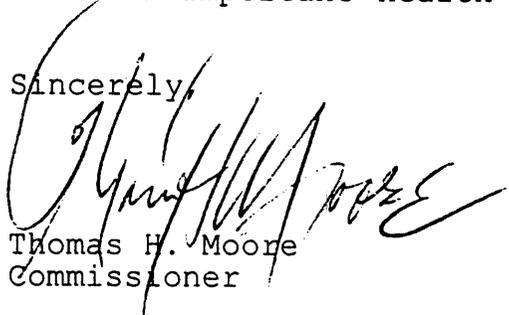
I have never felt under pressure, in any Commission rulemaking proceeding, to base my decision on anything other than my own analysis of the staff recommendation. One of the hallmarks of an independent federal agency is that the decision makers cannot be privately lobbied. If we have meetings with interested parties on a rulemaking, the meetings must be announced at least a week in advance and open to the public. Meeting logs are made of those meetings and filed with our Office of the Secretary. Thus anyone may find out who has visited with me and what was discussed. The press, and parties opposed to the views being presented, are free to come to these meetings, and often are in attendance.

It is a mischaracterization to state that the Commission **repealed** the national anti-flammability standard for children's sleepwear. It is true that infantwear (nine months and younger) is no longer covered. But for all other children, the sleepwear garments that have traditionally put children at risk, such as

nightgowns, robes, nightshirts and man-tailored pajamas must still meet the flammability test for children's sleepwear. We only exempted a specific style of children's sleepwear garment from the Standards, as has been done with success in several other countries.

Thank you again for considering my views on this matter and for soliciting input from your members on this important health issue.

Sincerely,



Thomas H. Moore  
Commissioner