



International Association of Fire Chiefs

4025 Fair Ridge Drive • Fairfax, VA 22036-2868 Telephone: (703) 273-0911

Fax: (703) 273-9363

Internet: www.iafc.org

1999 MAR 10 A 9:20
4 March 99

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

RE: Sleepwear Revocation

The International Association of Fire Chiefs (IAFC) is a professional organization representing the leadership of America's fire and EMS services for over 125 years.

The 12,000 members of the IAFC fully 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 necessary to help prevent death and disfigurement of our nation's infants and young children. Our primary reasons for seeking reinstatement of the previous standards are:

- ◆ 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.
- ◆ 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 a 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 25 years ago. This low level of injuries and deaths can primarily be attributed to the more stringent, previously established flammability standards.

The IAFC believes that *all* children's sleepwear should be required to be flame resistant - without exception. Therefore, we request your serious consideration of this issue and your support to return to standards that better and more appropriately protect infants and children. Thank you.

Providing leadership for the fire and emergency services since 1873

Member, International Technical Committee for the Prevention and Extinction of Fire/Comité Technique International De Prevention Et D'Extinction Du Feu (CTIF)

CF99-1-29



Baum-Harmon Memorial Hospital

255 N. Welch Avenue
Pringhar, Iowa 51245

Telephone
712-757-3905

March 4, 1999

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

RE: Sleepwear Revocation

Dear Mr. Secretary:

I strongly support the proposed revocation by the Consumer Product Safety Commission of the relaxed flammability standards for children's sleepwear. The stricter CPSC standards for children's sleepwear have prevented the death or serious injury and disfigurement of thousands of children—these standards were clearly working.

The strong standards for sleepwear design are especially important for infants and young children who are unable to protect themselves from fire danger. Few injuries are more painful or permanently disfiguring than serious burns.

As a nurse who works in the emergency department, I feel it is very important to protect the children who cannot protect themselves. Therefore, I strongly support the revocation of the relaxed flammability standards for children's sleepwear.

Sincerely,

A handwritten signature in cursive script that reads "Linda Bindner".

Linda Bindner, RN, BA
Baum-Harmon Memorial Hospital

Saint Elizabeth Regional Medical Center

*Burn and Wound Care Center**

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

RE: Sleepwear Revocation

Dear Sir or Madam:

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

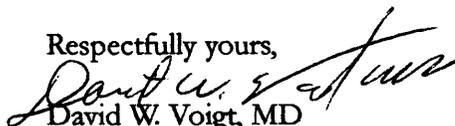
1. Burn injuries and deaths are preventable. Burn centers and fire departments all across America have done a fantastic job on public education and awareness; however, it never gets through to everyone. It is, in my opinion, criminal to endanger the lives, future employability, and appearance of innocent children to make it easier and cheaper for the clothing manufactures to make children's sleepwear. I have taken care of many babies where fire fighters rescued them from their cribs in an inferno, and had them have minor injuries. These young people have no ability to get out of the fire and need the extra protection this revocation can provide.

2. It is also questionable whether tight fit will compensate for the increased dangers associated with a more flammable material such as cotton. We all know that people buy clothes for children slightly too big so that they can wear them now and "grow in to them". This is a financial and convenience benefit for the parents.

3. I think it is clear that the previous standards did decrease injury to children. I also feel we have not seen the impact of the relaxed standards, as there is still many clothing items in use that complied with the more stringent 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. I think it is societies, and certainly the government's (YOUR) job to protect those that can't protect themselves

Respectfully yours,


David W. Voigt, MD
Director of Burn Research

Congress of the United States

Washington, DC 20515

March 4, 1999

Ms. 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 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 that parents do not buy clothes that fit tightly -- they buy them big enough for the child to grow in to. Also, 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

Sleepwear Revocation

March 4, 1999

Page Two

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 healthy and happy. 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.

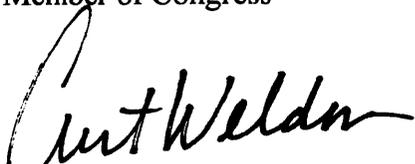
Sincerely,



Robert E. Andrews
Member of Congress



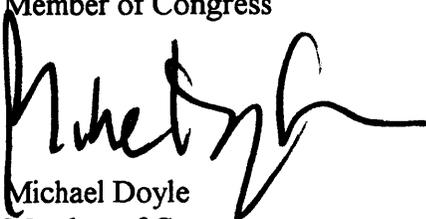
Rosa L. DeLauro
Member of Congress



Curt Weldon
Member of Congress



Phil English
Member of Congress



Michael Doyle
Member of Congress



Gary Ackerman
Member of Congress



Michael Castle
Member of Congress

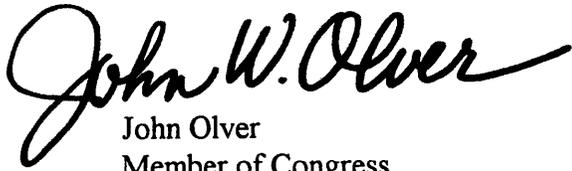


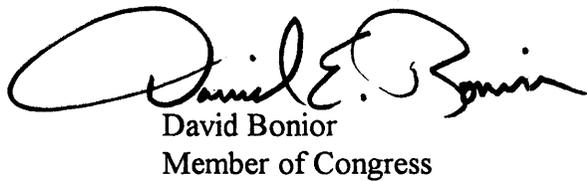
George Miller
Member of Congress

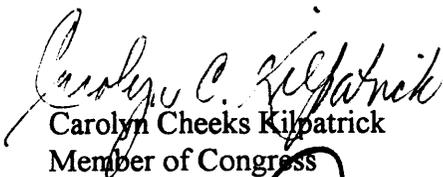
Sleepwear Revocation

March 4, 1999

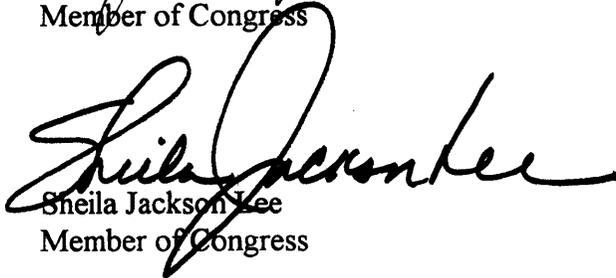
Page Three


John Olver
Member of Congress

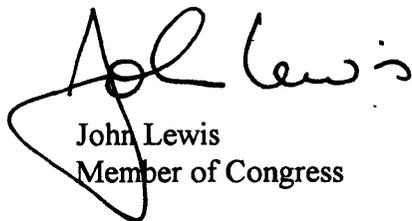

David Bonior
Member of Congress


Carolyn Cheeks Kilpatrick
Member of Congress


Sonnie Morella
Member of Congress

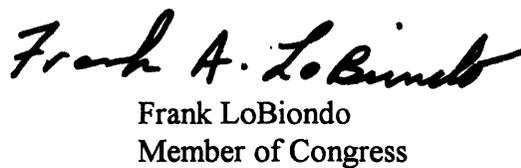

Sheila Jackson Lee
Member of Congress

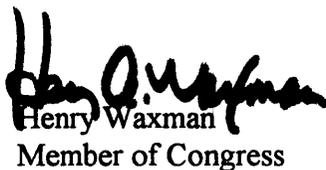

George Nethercutt
Member of Congress

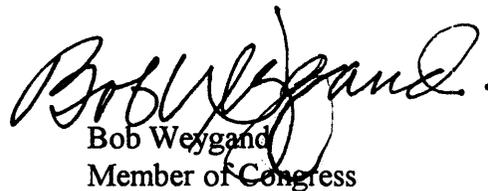

John Lewis
Member of Congress

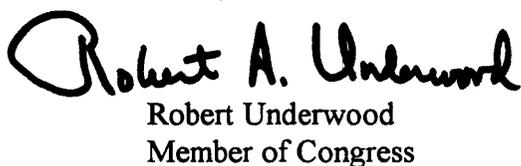

Martin Frost
Member of Congress

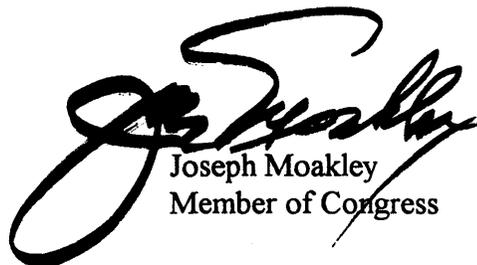

Sherrod Brown
Member of Congress


Frank LoBiondo
Member of Congress


Henry Waxman
Member of Congress

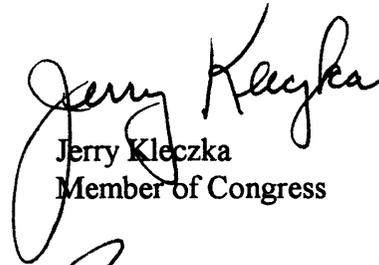

Bob Weyand
Member of Congress


Robert Underwood
Member of Congress


Joseph Moakley
Member of Congress



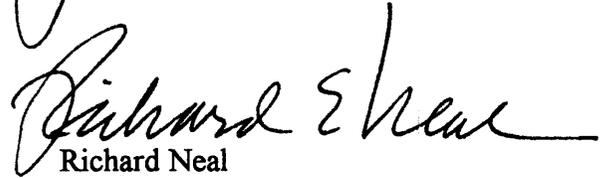
Frank Mascara
Member of Congress



Jerry Kleczka
Member of Congress



Eliot Engel
Member of Congress



Richard Neal
Member of Congress



Eva Clayton
Member of Congress



Michael McNulty
Member of Congress



Dennis Kucinich
Member of Congress



Albert Wynn
Member of Congress



Lloyd Doggett
Member of Congress



Robert Wise
Member of Congress



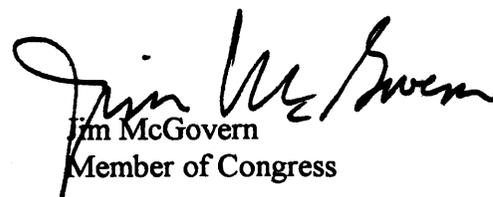
Lucille Roybal-Allard
Member of Congress



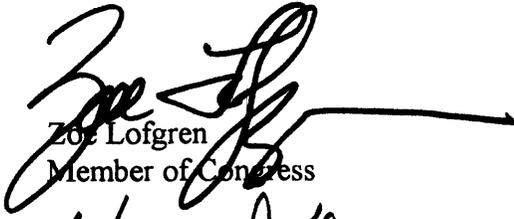
Louise Slaughter
Member of Congress



Bob Filner
Member of Congress



Jim McGovern
Member of Congress



Zoe Lofgren
Member of Congress



Ellen Tauscher
Member of Congress



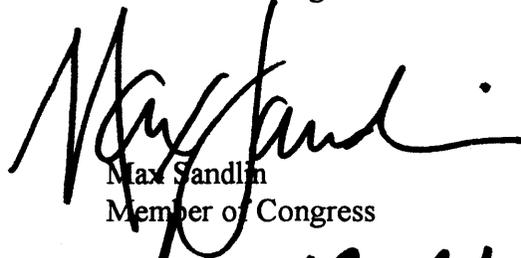
Karen Thurman
Member of Congress



Sam Farr
Member of Congress



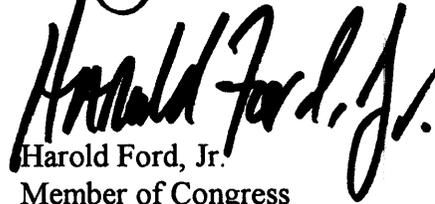
Jan Schakowsky
Member of Congress



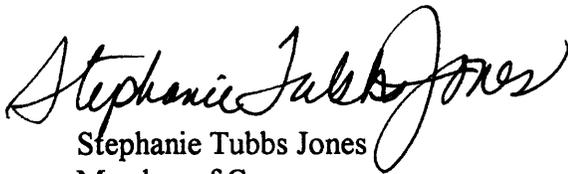
Max Sandlin
Member of Congress



Brad Sherman
Member of Congress



Harold Ford, Jr.
Member of Congress



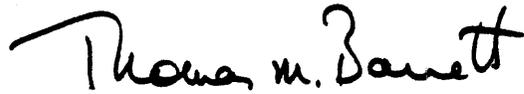
Stephanie Tubbs Jones
Member of Congress



Eleanor Holmes Norton
Member of Congress



Tim Holden
Member of Congress



Thomas Barrett
Member of Congress

Barbara Edwards
121 Brunswick Avenue
Bloomsbury, N.J. 08804

March 5, 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,

I am 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, I 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 I 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.

I 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. I 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 that reads "Barbara Edwards". The signature is written in a cursive style with a long, sweeping horizontal line extending to the right.

Barbara Edwards

Author: <SuFrancis@aol.com> at INTERNET-MAIL
 Date: 3/10/99 10:20 PM
 Priority: Normal
 TO: cpssc-os@ntmail.cpsc.gov at internet-mail
 BCC: Todd A. Stevenson at CPSC-HQ1
 Subject: Sleepwear Revocation
 March 10, 1999

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

Regarding: SLEEPWEAR REVOCATION

Greetings:

The following points can be made in support of maintaining the amendments, which authorize manufacture and sale of complying untreated cotton products as children's sleepwear:

1. The amendments allowing sale of untreated, snug-fitting cotton sleepware do not relax safety considerations. Snug-fitting products still have to pass the general wearing apparel standard. And, loose-fitting sleepwear products are still required to pass a severe flame test.
2. Apparel manufacturers and retailers have developed point-of-purchase education materials to inform parents about sleepwear products and the education and training programs will be enhanced.
3. The amendments allowing manufacture and sale of snug-fitting, untreated cotton products as children's sleepwear helps reduce confusion between what is considered sleepwear, underwear and playwear and provide the consumer an informed choice to purchase cotton garments with their children's safety in mind.

4. The CPSC has stated "(t)his amendment enables consumers who prefer to put their children in bed in cotton garments, to choose safer, snug-fitting garments rather than loose-fitting daywear, such as T-shirts and sweats."

We (my husband, Kavanaugh, and I) are the parents of an eight year old girl and the aunt and uncle of many nieces and nephews. It has been my observation through the years that children prefer the comfort of cotton for sleepwear, and if cotton sleepwear is not available they resort to wearing oversized T-shirts to bed--boys and girls alike. Our daughter has received gifts of pretty, frilly, synthetic nightgowns which, even though she thinks they are beautiful, go unworn in favor of the cotton nighties. If nothing cotton is clean or available she will pull out a large cotton T-shirt or, on a cold night, her cotton long underwear instead of wearing the synthetic sleepwear. That is typical for about every child I have observed. At our daughter's slumber party recently, the eight other little girls wore cotton sleepwear or large cotton T-shirts to sleep in. I don't understand how cotton ever got banned as sleepwear in the first place. If the amendment is revoked, there are going to be even more children wearing oversized T-shirts to bed.

We support CSPC's decision to amend the children's sleepwear flammability standards. We agree with CPSC that this amendment offers the consumer safer sleepwear alternatives. CPSC should not revoke the amendment.
 Sincerely, Susan Francis, 701 Palm Valley Drive East, Harlingen, Texas 78552

March 10, 1999

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

Regarding: SLEEPWEAR REVOCATION

Greetings:

Subject: Sleepwear Revocation

Date: Thu, 11 Mar 1999 08:55:12 -0800

From: Sue Elsesser <elsessers@co.oakland.mi.us>

Organization: Oakland County

To: cpssc-os@cpssc.org

CC: info@ameriburn.org

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.

Sue Elsesser
Oakland County Health Division
27725 Greenfield Road
Southfield MI 48076

Author: <palmerci@earthlink.net> at INTERNET-MAIL
Date: 2/13/99 9:51 PM
Priority: Normal
TO: cpsc-os@ntmail.cpsc.gov at internet-mail
BCC: Todd A. Stevenson at CPSC-HQ1
Subject: Cotton pajamas
To Whom It May Concern:

I am writing to express my strong support for the rules that allow my kids to sleep in cotton pajamas. I urge you not to repeal these rules, and to leave them in place indefinitely.

I appreciate the CPSC's concerns for the safety of my children. However, I believe the old polyester-only standard for pajamas no longer reflects real life because of home safety advances and changes in fashions over the past twenty years. Since the 1970's, when the polyester-only standards were first enforced, the number of potential fire sources in the home has been drastically reduced through other safety measures. Moreover, since then, many consumers, including those in my own family, have become accustomed to the look and feel of natural fibers, such as cotton.

A few years back, the CPSC updated the existing polyester-only standard to permit the sale of certain kinds of cotton pajamas. This was a thoughtful move, which I heartily welcomed. It provides me, and other parents like me, the flexibility of dressing our kids in pajamas made with natural fibers. Moreover, because the pajamas are either snug-fitting or used for infants (who don't go near flames or heat sources), they are not about to catch on fire. In fact, I understand there have been no cases of burn injuries related to these kinds of cotton pajamas since those rules took effect. Sounds to me like you have a good thing going that you shouldn't mess up.

Please do not repeal the cotton pajama rules.

Sincerely,
Cindy Palmer
Moorhead, MN

CF99-1-36

Author: Murray S. Cohn at CPSC-HQ1
Date: 2/25/99 2:20 PM
Priority: Normal
TO: Todd A. Stevenson
Subject: For OS to handle or send to the proper place!
2/25/99 11:11:19 AM

Name = Karen Dionne
Address = 8137 E. Fremont Ave.
City = Englewood
State = CO
Zip = 80112-1826
Email = wcole@uswest.net
Telephone = 303-220-8911

I have recently read an article in the Rocky Mountain News regarding the 1996 decision to allow the sale of 100% cotton pajamas for children over 9 months and infant sleepwear ages 9 months and under.

I am EXTREMELY opposed to this decision and would like it reversed ASAP. I feel confident that children are in jeopardy and many lives will be dreadfully painful or terminated as a result of the revised standard.

Thank you for listening,
Karen Dionne

Miss Penn

3-1-99

I READ YOUR ARTICLE ON FLAMMABLE PAJAMAS AND ROSA DE LANRO'S INSISTANCE IT IS WORKING.

I WORKED IN ALEXANDER'S DEPT STORE IN MILFORD, CONN IN 1972. I REMEMBER WHEN THAT MANDATE WENT INTO EFFECT, NO ONE WOULD BUY OUR PAJAMAS, BECAUSE THE PRICE OF PAJAMAS WENT FROM \$3.05 TO \$10.00.

PEOPLE JUST DON'T BUY PAJAMAS FOR THEIR KIDS ANYMORE BECAUSE OF THE PRICE, AND THAT IS BECAUSE THE GOVERNMENT MANDATED FLAMMABLE. I HAVE 12 GRANDCHILDREN AND 6 GREAT GRANDCHILDREN, I KNOW FOR A FACT KIDS DON'T WEAR PAJAMAS ANYMORE.

Mrs Margaret Wright
135 Hillside Ave.

Shelton, Ct. 06484

Marjorie H Bolack
 376 Soundview Ave
 Stratford, CT 06427-5866
 06615

March 1, 1994

Dear Mrs. Dunni:

Representative Rosa DeLauro, D-3, is 100% correct in asking the federal Consumer Product Safety Commission not to weaken flammability standards for children's sleepwear that was established in 1972. The present standard, by statistics, has proven it works well. We have no right to put our children at risk.

yours truly,
 Marjorie H Bolack.

I know the tragedy of lost lives to instant combustion. My sister-in-law, age 23, and her dear children, ages 1, 2, 3, died in a fire.

Keep this present standard or better it.

See Back —

Before Regulations	Today
<u>1000</u> seriously burned	100 approx.
<u>60</u> deaths	Less than 4

This must be considered

CF 99-1-39

March 3, 1999

CPSC/DFC OF THE SECRETARY
OFFICE OF INFORMATION

1999 MAR -9 A 9 12

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

Dear Madam,

As a parent, grandparent and consumer of children's sleepwear, I would like to appeal to you to support the amendment allowing sale of snug-fitting untreated cotton products as complying sleepwear.

The amendments permitting the sale of untreated, snug-fitting cotton sleepwear does not relax safety standards for our children and surely contributes to their comfort.

I very much support the C.P.S.C.'s decision to amend the children's sleepwear flammability standards. This amendment offers us, the consumer safer sleepwear alternatives. Please do not revoke this step forward for our children.

Sincerely,

Marshall W. Grant
Marshall W. Grant

**Richard W. Burgess
Director of Public Relations
Shriners Burns Hospital
51 Blossom Street
Boston, MA 02114**

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

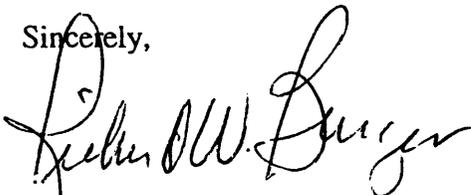
RE: Sleepwear Revocation

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, 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 standard.

As a member of the healthcare profession in a specialized pediatric burn hospital, who must deal with the pain and suffering 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,



0499-1-46

C. FRED MOULTON
1754 STATE ROAD
PLYMOUTH, MA. 02360
Feb. 29, 1999

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

RE: Sleepwear Revocation

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, 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 standard.

As a member of the healthcare profession in a specialized pediatric burn hospital, who must deal with the pain and suffering 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,

C. Fred Moulton

C.F 99-1-42
ELMER L. MAXWELL
21A SWEETSER ST.
WAKEFIELD MA 01880

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

RE: Sleepwear Revocation

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Sincerely,

Elmer L. Maxwell

CF 49-1-43
DONALD F CHALMERS
10 CALTNA Rd
BRIGHTON MA 02125

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

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Sincerely,

Donald F Chalmers

Thomas W. Campbell
91 Kenmere Road
Medford, MA 02155-4117
February 29, 1999

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

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Sincerely,



CP 79-1-43
DONALD E CHAMBERS
10 CALTHA RD
BRIGHTON MA 02135

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

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Sincerely,

Donald E. Chambers

CHARLES W. GERRARD
44 FISKE ST.
TEWKSBURY, MASS.
01876

2-19-99

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

RE: Sleepwear Revocation

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Sincerely,

Charles W. Gerrard

Linda M. Fringuelli
48 Blaney Street
Revere, MA 02151

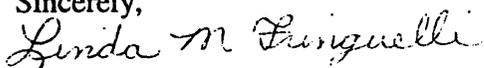
Office of the Secretary
Consumer Product Safety Committee
Washington, DC 20207

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Sincerely,

Linda M. Fringuelli

February 18, 1999

Mary Hoey
32 R Street
South Boston, MA 02117Office of the Secretary
Consumer Product Safety Committee
Washington, DC 20207

RE: Sleepwear Revocation

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Sincerely,

Mary Hoey

Norma Marotta
1609 State Road
Plymouth MA 02360

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

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Sincerely,



Nancy Littlehale
10 Orange Street
Reading, MA 01867

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

RE: Sleepwear Revocation

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Sincerely,



Nancy Littlehale

CF99-1-53

30 High View Road
Norwood, MA. - 02062
Feb. 22, 1999

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

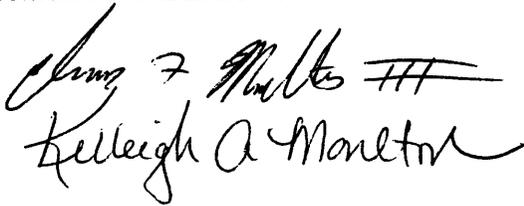
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Sincerely,


Kelleigh A. Manelton

CF99-1-54

March 2, 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 cursive script that reads "Melinda Bridges". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

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

March 4, 1999

Re: Sleepwear Revocation

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Sincerely,

Gale N. LaFountain

Gale LaFountain
4700 Courthouse Rd.
Chesterfield, VA 23832



**SHRINERS
BURNS
HOSPITAL
BOSTON**

51 Blossom Street
Boston, Massachusetts
02114-2699

Telephone
617-722-3000
Fax
617-523-1684

www.shrinershq.org

*Larry L. Hersom, P.P.,
Chairman*

*Ronald G. Tompkins,
M.D., Sc. D.,
Chief of Staff*

*Robert F. Bories, Jr.,
FACHE,
Administrator*

March 3, 1999

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

Re: Sleepwear Revocation

Dear Colleague:

My name is Robert Sheridan. I am a surgeon at the Massachusetts General Hospital and the Shriners Burns Hospital in Boston. Part of my responsibilities include performing surgeries on burn victims.

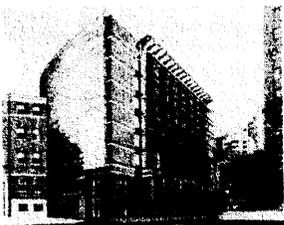
I support revocation of the amended flammability standards for children's sleepwear. I believe that the old standard worked. Data substantiated that deaths had dropped from 60 per year to four. Also, everyone knows that infants at age 9 months are quite mobile. The CPSC determination that they are not and therefore not in need of flammability protection is dangerous. For CPSC to say that since the 1996 decision there has been no data showing burn injuries or fatalities as a result of the relaxed standard is difficult to believe, since it is much too soon for standard data to have emerged.

In light of these facts, I strongly believe that the 1996 amendment should be revoked and the old flammability standard reinstated.

Sincerely

Rob Sheridan, MD
Assistant Chief of Staff

meh





March 3, 1999

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

RE: Sleepwear Revocation

Dear Sir:

I strongly support the 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. 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 may be 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, 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



Shriners Burns Hospital - Galveston

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



March 3, 1999

flammability standards for children's sleepwear. It can make a difference in the prevention of death and disfigurement for our nation's children.

Sincerely,

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



Shriners Burns Hospital - Galveston

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

CY99-1-58

PRIORITY MOBILE HEALTH

P.O. Box 6379
NEW ORLEANS, LA 70174

(504) 366-2992
FAX: (504) 365-2170



March 5, 1999

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

Re: Sleepwear Revocation

Dear Sir or Madam:

Priority Mobile Health is a ground and air provider of emergency medical services in the state of Louisiana. As emergency healthcare providers, we are faced with dealing with burned patients on a routine basis. We support the revocation of the amended flammability standards for children's sleepwear.

The old standard was working. The National Electronic Surveillance System data show that, after the adoption of the flammability standards in 1972, the average rate of deaths from burn injuries dropped from 60 per year to four and under; why fix something that isn't broken.

Infants at age 9 months are quite mobile and the CPSC determination that they are not and, therefore, not in need of flammability protection is dangerous.

Snug fitting is a very impractical standard: parents typically buy clothing in sizes larger than the age of the child so that the child has room to grow. Parents often provide younger children with hand-me-down clothing or purchase clothing in second-hand markets where hang-tag and other information about the importance of a snug fit will be lacking.

CPSC has continued to state that since its 1996 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 infant fatality should be enough to change the vote of the CPSC Commissioners.

Relaxing the children's 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 children's sleepwear.

The CPSC should revoke the 1996 amendments and reinstate the old flammability standard.

Thank you for your consideration in this most important matter.

A handwritten signature in cursive script that reads "Jan R. Boatright".

Jan R. Boatright R.N., CEN
Associate Director

**Louisiana Council of the Emergency Nurses Association**

March 5, 1999

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

Re: Sleepwear Revocation

Dear Sir or Madam:

The Louisiana Council of the Emergency Nurses Association Board of Directors represents approximately 450 registered nurses that work in the emergency departments and EMS agencies within our state. As healthcare providers, we are faced with dealing with burned patients on a daily basis. We support the revocation of the amended flammability standards for children's sleepwear.

The old standard was working. The National Electronic Surveillance System data show that, after the adoption of the flammability standards in 1972, the average rate of deaths from burn injuries dropped from 60 per year to four and under; why fix something that isn't broken.

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The CPSC should revoke the 1996 amendments and reinstate the old flammability standard.

Thank you for your consideration in this most important matter.

Jan R Boatright R.N., CEN
President Elect

March 6, 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,

Keith D. O'Connor

CF99-1-661

March 8, 1999

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

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The revised standard which exempts sleepwear for infants nine months or 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 Consumer Product Safety Commission's decision to relax the fire safety standard was made with the understanding that the manufacturer 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. Additionally, the tags that were supposed to inform consumers that a garment is not flame resistant are difficult to understand. As you are probably aware, most are in English—making it difficult for non-English reading consumers 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.

Sincerely,

Rosemarie A. Greenwald

Signature
ROSEMARIE A. GREENWALD

Printed name
844 HOLLIDAY LANE
WESTMINSTER MD 21157

March 8, 1999

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

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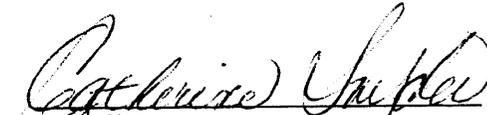
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We have the utmost respect for the Consumer Product Safety Commission. The CPSC is the premier agency for protecting our children's safety. Parents look to you to help them ensure their children grow up happy and healthy. We urge you not to send parents 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.

Sincerely,


Signature
Catherine Snyder
Printed name

March 4, 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 more strict CPSC standards for children's sleepwear flammability. These standards have previously proven their effectiveness in helping to prevent death and disfigurement for hundreds of our nation's most important natural resource—our children.

Before considering this question, I ask that you visit a burn center in a community near you. Take a good long look at a burned child. Ask if you can see their photo album of children who have recovered from burns, and you will learn the truth: a severe burn is never recovered from.

Babies and young children who are affected by this standard are in a tough stage developmentally. They are often mobile enough to get themselves in trouble with fire, but not cognitively developed enough to "stop, drop, and roll".

The idea that the sleepwear in question is snug fitting, and that reduced flammability is ridiculous. Kids wear big stuff. Do you wear tight pajamas?

The old flammability standards were clearly working. Why did the CPSC ever allow them to be relaxed in the first place. This was clearly an error in judgment that costs only in lives and lifestyles for our children.

As Chief Nurse Executive in a rural hospital which deals with the pain, suffering, and cost of burn injuries, 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.

Best regards,

Marilyn K. Lofflin, RN, BSN
Director of Patient Care Services
Orange City Hospital and Clinic
Orange City, IA 51201

March 11, 1999



Commissioner Ann Brown
 Consumer Product Safety Commission
 4330 East-West Highway
 Bethesda, MD 20814

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 Executive Director

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Re: Enforcement of Amended Children's Sleepwear Standards

Dear Commissioner Brown,

As you know, the Trauma Foundation has followed children's sleepwear standards for nearly two decades now. The 1996 amendments to the standards were undertaken after the Commission's Office of Compliance was unable to enforce the old standard and parents were able to purchase non-flame resistant garments. I have heard disturbing reports, though not documented, that indicate the Office of Compliance is again having difficulty enforcing the applicable children's sleepwear standard. Anonymous reports indicate that CPSC is aware of national retailers which are promoting and selling tightfitting sleepwear with size specifications that violate the new rule's measurement requirements. These reports also allege that the Office of Compliance, though cognizant of these violations, is taking no action against these retailers and manufacturers.

The Trauma Foundation has consistently opposed the 1996 amendments as an inappropriate response to the Commission's inability to keep non-flame resistant garments off store shelves. Now anonymous sources indicate that dangerous 100% cotton sleepwear is available in sizes that pose a serious risk of death or disfiguring injury, and that, again, CPSC is unable or unwilling to enforce the weakened standards.

This situation is of grave personal and professional concern to me. In light of the serious danger these loose cotton garments pose to the children who sleep in them, I would like to know what knowledge CPSC has about violations, and if violations are uncovered and confirmed, what actions the Office of Compliance will undertake immediately to halt the manufacture and sale of these dangerous products.

Sincerely,

Andrew McGuire
 Executive Director

cc: Rep. Rosa DeLauro
 Rep. Rob Andrews
 Rep. Curt Weldon

San Francisco General Hospital
 San Francisco, California 94110
 415/821-8209
 415/282-2563 Fax
 www.traumafdn.org

2140 Shattuck Avenue, Suite 1110
 Berkeley, California 94704
 510/649-8942
 510/649-8970 Fax

CF 99-1-65

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

March 12, 1999

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,

Joni Reidel

CF99-1-66

Renee Henningsen Stilwell
5435 Plymouth Meadows Court
Fairfax, Virginia 22032-3221
(H) 703-250-1071
(W) 703-246-3962

CPSC/OFFICE OF
THE SECRETARY

1999 MAR 15 P 1:53

March 15, 1999

*Received 1 copy
Cindy Hallway*

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

RE: Sleepwear Revocation

Dear Ms. Dunn:

I am writing this letter about my daughter's personal tragedy with fire and the trauma it caused her for the rest of her life. It is my hopes that sharing Maria's story will help everyone understand the importance of reinstating the sleepwear standard.

In the spring of 1972, I was a typical young mother who believed that loving and caring for her small child was enough to keep her safe and out of harms way. When it came to purchasing sleepwear for Maria, I looked at price, and how "pretty" she would look in it. I didn't know about sleepwear standards at that time, if there were any I didn't see how that would have any impact on my family and neither did the average parent. As such, I purchased a soft, 100% cotton nightgown for Maria. Unfortunately, Maria was soon to learn how totally naive I was. If I could have known how Maria's life would change, forever, on June 24, 1972 I would give anything to go back in time and change what happened. Going back in time is not an option, unfortunately. We learn from our mistakes, but we must live with the consequences of our decisions.

Maria, like so many other 3 1/2 year olds, was curious about anything and everything. She discovered some unattended matches used for lighting candles, her curiosity and inquisitive nature overtook her and she lit one of the matches. When the flame startled her, she dropped the match and it landed on her nightgown. In seconds, Maria had sustained third degree burns over 38% of her body. Maria was initially taken to Fairfax Hospital in critical condition. Once stabilized and strong enough to be transferred, she was taken to Shriners Burn Hospital, Boston, Massachusetts. She spent the next 4 1/2 months undergoing several long and painful operations. Maria was forced to relearn the basic day to day functions that most of us take for granted. Simple tasks such as walking, and playing could no longer be done.

Over the next ten years, Maria returned to Shriners Hospital many times—she had a total of 14 operations and spent 18 months in hospitals. Maria, like so many burn survivors, had to cope with all the normal growing pains of adolescence. She had the added burden of coping with the physical and the emotional scars that burn survivors carry with them forever. Like most children, Maria was invited to her share of slumber parties. She loved to go, but she always dreaded when she had to change her clothes and trying to hide and cover up her disfigurement. When she bought a bathing suit or a party dress, she always made sure it completely covered her scars. Every time Maria saw someone whispering, she always wondered if her scars were the subject. These are only some of the, obstacles Maria had to overcome throughout her everyday life.

Through all of this, Maria grew up to be a wonderful, caring, and intelligent, loving person. She graduated from college, met the man of her dreams and is happily married. On June 3, 1996, she gave birth to my beautiful granddaughter, Ashley. Ashley brings joy to all of us, just as Maria has these past thirty years.

Watching Ashley is like watching Maria all over again, she has the same unquenchable curiosity about everything. Who is going to make sure she stays safe and out of harms way? Will she be protected from the things that Maria was not?

A sleepwear standard was not in place to help Maria, but because of her injuries and many other injuries like hers, the right and the correct standard relating to children's sleepwear was introduced by Consumer Products Safety Commission in 1972.

Here we are, twenty-five years later, again fighting to get a sleepwear standard reinstated that we know was working to protect our children. I ask you why, did the CPSC ever change the standard that they put in place in 1972 and why now, again, there is no standard for children sleepwear that safe guards our children from sleepwear that is substandard.

As an educator, I couldn't agree more that education is a valuable tool but it is only one of the tools that will help us keep our children safe. Parents always want to do what is right and best for their children. However, they need to have the best information available to make choices that are in the best interests of their children. If labeling a product was all it took to educate and change behaviors, we would have no reason for concern. However, real life experiences tell us different. The solution is never that simple.

The Consumer Product Safety Commission makes decisions everyday that provide us a safer world to live in and makes it safer for the next generation.

With the lowering of the sleepwear standard, the Consumer Product Safety Commission has requested fire and medical professionals to monitor the situation very closely. They will report to the Commissar, any injuries or deaths associated with children's sleepwear burn incidents. When an increase in reported burn injuries associated with sleepwear is documented. It will then be possible that the Consumer Product Safety Commission will reconsider its position.

I ask why we must subject any child to guinea pig status to support what we already know. I implore you to change the standard back to what it used to be. We should never have to stand here again and listen to a story that is full of tragedy. Please make the decision that will ensure a safe sleepwear standard. There is no doubt that it will reduce, prevent injury and death. No one can change what happened to Maria. She is the living example of why we need children's sleepwear standard that works.

What we need is to change the standard for unsafe sleepwear. Please do what is necessary to put back in place what should never have left. Reinstate a safe sleepwear standard, now.

Thank you,

Renee Henningsen Stilwell

Renee Henningsen Stilwell



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

SLEEPWEAR RELOCATION

TO WHOM IT MAY CONCERN:

IT HAS BEEN BROUGHT TO MY ATTENTION THAT AFTER ALMOST FIVE YEARS OF EXHAUSTIVE RESEARCH AND EXTENSIVE HEARINGS BY THE CPSC THE CONCLUSION WAS THAT SNUG-FITTING COTTON PRODUCTS DO NOT PRESENT A FLAMMABILITY RISK TO CHILDREN.

WITH THIS IN MIND, I AM ENCOURAGING HAVING PARENTAL CHOICE WHEN PURCHASING SLEEPWEAR FOR CHILDREN AND GRANDCHILDREN.

I SUPPORT CONSUMER PRODUCT SAFETY COMMISSION'S DECISION TO AMEND THE CHILDREN'S SLEEPWEAR FLAMMABILITY STANDARDS; AGREEING WITH CPSC THAT THIS AMENDMENT OFFERS THE CONSUMER SAFER SLEEPWEAR ALTERNATIVES, AND THAT CPSC SHOULD NOT REVOKE THE AMENDMENT.

SINCERELY,

A handwritten signature in cursive script that reads "Margie Mayfield".

MARGIE MAYFIELD, TEXAS CHAIRMAN
NATIONAL COTTON WOMEN'S COMMITTEE

MARCH 10, 1999

CF99-1-68

James B. Hansen
Jess V. Hansen
Kendall W. Gardner

Corcoran Airport
Post Office Box 398
Corcoran, California 93212
Phone (209) 992-3111

VISTA VERDE FARMS, INC.

March 8, 1999

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

Re: Sleepwear Flammability Standards Revocation

Madam/Sir:

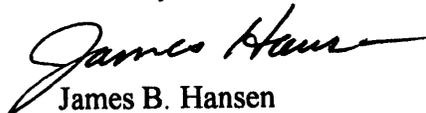
As family farmers trying to endure some very difficult years in agriculture, we are obliged to respond to a revocation proposal that we believe fails to offer increased safety to our children and is surely detrimental to us as cotton farmers. We do not need yet another blow to our attempts to survive.

We all have children of our own and the safety for them and all other children is certainly paramount in our minds at all times. The amendments that are being considered for revocation have not relaxed safety standards. We also believe that the amendments improve the ability of consumers to make wise purchase decisions.

As a side note, we are told that the only product that was previously able to pass the flammability test was 100% polyester and other similar synthetic fibers. While by some definition of flammability this may be true, we have personally witnessed instances of polyester clothing melting and adhering to the wearer causing much more severe burn injury than would have been incurred otherwise. This, in our opinion, points up the fact that some of the "evidence" used in safety legislation by well-intentioned lay persons is, at the very least, suspect!

We adamantly support the Consumer Product Safety Commission's decision to amend the flammability standards. We agree with CSPC that this amendment offers safer sleepwear alternatives and we strongly urge you not to revoke the amendment.

Sincerely,



James B. Hansen



Jess V. Hansen



Kendall W. Gardner

kp

CF99-168

Phillip Hansen Ranch
Harp & Hansen
Hansen Equipment
Double J Farms
Vista Verde Farms, Inc.

James B. Hansen
Jess V. Hansen
Philip W. Hansen
Mark V. Hansen
Erik J. Hansen
Nis P. Hansen

HANSEN RANCHES

March 8, 1999

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

Re: Sleepwear Flammability Standards Revocation

Madam/Sir:

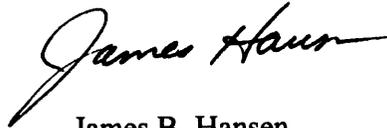
As family farmers trying to endure some very difficult years in agriculture, we are obliged to respond to a revocation proposal that we believe fails to offer increased safety to our children and is surely detrimental to us as cotton farmers. We do not need yet another blow to our attempts to survive.

We all have children of our own and the safety for them and all other children is certainly paramount in our minds at all times. The amendments that are being considered for revocation have not relaxed safety standards. We also believe that the amendments improve the ability of consumers to make wise purchase decisions.

As a side note, we are told that the only product that was previously able to pass the flammability test was 100% polyester and other similar synthetic fibers. While by some definition of flammability this may be true, we have personally witnessed instances of polyester clothing melting and adhering to the wearer causing much more severe burn injury than would have been incurred otherwise. This, in our opinion, points up the fact that some of the "evidence" used in safety legislation by well-intentioned lay persons is, at the very least, suspect!

We adamantly support the Consumer Product Safety Commission's decision to amend the flammability standards. We agree with CSPC that this amendment offers safer sleepwear alternatives and we strongly urge you not to revoke the amendment.

Sincerely,



James B. Hansen



Jess V. Hansen

JH/kp

CF 99-1-69

Valley CO-OP Oil Mill



P.O. BOX 533609
HARLINGEN, TX 78553-3609
TELEPHONE: (210) 425-4545
FAX: (210) 425-4264

VALCO BRAND • COTTONSEED PRODUCTS • AGRICULTURAL CHEMICALS • FERTILIZERS

March 12, 1999

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

RE: Sleepwear Revocation

Dear Madam/Sir:

I recommend that CPSC maintain the amendment allowing the sale of snug-fitting untreated cotton products as complying sleepwear, and I also agree with CPSC that the amendment offers the consumer safer sleepwear alternatives. CPSC should not revoke the amendment. There has been no evidence to indicate that snug-fitting clothes products pose any danger to children.

Yours truly,

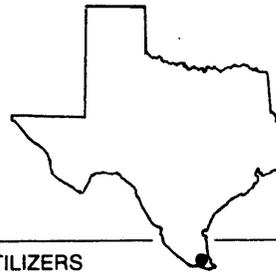

Gene Taubert

GT/lcr

Valley CO-OP Oil Mill



VALCO BRAND • COTTONSEED PRODUCTS • AGRICULTURAL CHEMICALS • FERTILIZERS



CF 99-1-20

P.O. BOX 533609
HARLINGEN, TX 78553-3609
TELEPHONE: (210) 425-4545
FAX: (210) 425-4264

March 12, 1999

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

Dear Madam/Sir:

I am writing today to strongly support the amendments to allow the manufacture and sale of complying untreated cotton products as children sleepwear. The CPSC has stated that after five years of exhaustive reasearch they concluded these products do not present a flammability risk to children. I feel parents should have the choice of letting their children sleep in these comfortable and safe attire.

Thank you for your consideration .

Sincerely,

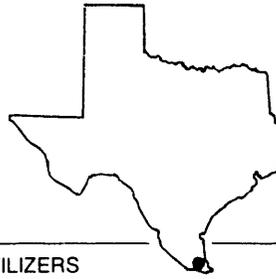

Bobby Crum

Valley CO-OP Oil Mill



VALCO BRAND • COTTONSEED PRODUCTS • AGRICULTURAL CHEMICALS • FERTILIZERS

CF99-1-70



P.O. BOX 533609
HARLINGEN, TX 78553-3609
TELEPHONE: (210) 425-4545
FAX: (210) 425-4264

March 12, 1999

Office of the Secretary
Consumer Products Safety Commission
Washington, DC 20207
301-504-0127

Dear Madam/ Sir:

In reference to the Consumer Product Safety Commission on proposal to revoke an amendment to Children's Sleepwear Flammability Standards which allow sale of snug-fitting cotton products, we strongly support CPS not to approve the proposed regulation to revoke this amendment. There has been no evidence to indicate that snug fitting clothes products pose any danger to children.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Hollis G. Sullivan".

Hollis G. Sullivan

March 11, 1999

Ms. Sadye E. Dunn
Consumer Products Safety Commission
4330 East-West Highway, Room # 502
Bethesda, Maryland 20814

Dear Ms. Dunn,

I am writing on behalf of the many children who could potentially be injured due to the 1996 amendments to the Flammable Fabrics Act. I encourage the return of the original stricter safety standard, which kept our children safe for over 25 years.

I ask you to remember why the standard was introduced in the first place. Many years ago, we saw that there was a need to make a rigid standard for children's sleepwear, so we created a rigid standard and the number of burn injuries dropped dramatically. Are our children today less valuable than they were in when the standard was created? If they are just as precious, then why are we our putting them in danger every night when we put our children to bed in hazardous clothing? Children have been injured in the past and will continue to be injured due to this change in the Flammable Fabrics Act.

I do not believe this standard would have been relaxed if you were educated about the danger and potential of fire. I feel that it is important for you to know what emergency response agencies all across our nation everyday. If you knew what they see, you would understand how heart wrenching it is to see a child needlessly burned, and what it is like to listen to their screams of agony piercing your ears. You need to understand what it feels like to treat a child with severe burns; knowing you have to put this innocent child in more pain in order to treat their little body.

You need to think about what it would be like surviving the cruel and needless torment of medical procedures that burn victims have to go through. Then imagine what it is like having to make friends and meet new people, knowing that when people see you, they have trouble looking past your disfigured façade. These heroic young people have survived, but why do we have to wait for this to happen again before we change the standard back? The longer it takes to reinstate the standard; more children will have to face this hardship.

I understand that the justification for the 1996 amendment was partially due to the fact that you feel that children under the age of nine months are "immobile". Well, we all know that children under the age of nine months of age are not necessarily immobile. These children may not be able to walk, however they certainly can crawl or roll, which may put them in a situation where they may be exposed to open flame. It would be ignorant for us to assume that a fire will not occur or hurt us just because we are "immobile".

As far as the "tight fitting" sleepwear being exempt from the standard because of the assumption that parents will dress their child in tight fitted clothes, it is common knowledge that parents tend to purchase or use hand me down clothes big enough for the child to grow into. Many parents are not even aware that this is a concern, which is why we have the Consumer Product Safety Commission in place to protect our children and make sure that they grow up safe and healthy. I can not stress to you how important it is for you to understand that the combination of combustible material and baggy clothing is deadly.

Each and every day, emergency responders respond to unnecessary and preventable injuries. Why does this have to continue? Shouldn't we do everything we possibly can to prevent these horrific incidents? I urge you to please reconsider the strict flammability standard for children's sleepwear. Please, reconsider the original Flammable Fabric Act and save many innocent children the agony of burn survival, or even death.

Sincerely,


Kara J. Van Graafeiland

CF99-1-73



CPSC/OFC OF THE SECRETARY
CONSUMER PRODUCT INFORMATION

1999 MAR 16 P 3:00

Apparel Research: Design and Marketing
a program of the
Texas Food & Fibers Commission
1412 Ridge Road Rockwall, TX. 75087

Kaye Ridings
College Coordinator
972/ 771-5725

March 12, 1999

OFFICE OF THE SECRETARY
CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207

SUBJECT: SLEEPWEAR REVOCATION

DEAR MADAM/SIR:

I STRONGLY RECOMMEND THAT CPSC MAINTAIN THE AMENDMENT ALLOWING THE SALE OF SNUG-FITTING UNTREATED COTTON PRODUCTS AS COMPLYING SLEEPWEAR.

THE AMENDMENTS ALLOWING SALE OF UNTREATED, SNUG-FITTING SLEEPWEAR DO NOT RELAX SAFETY CONSIDERATIONS, AS THESE PRODUCTS STILL HAVE TO PASS THE GENERAL WEARING APPAREL STANDARD.

APPAREL MANUFACTURES AND RETAILERS HAVE DEVELOPED POINT-OF-PURCHASE EDUCATION MATERIALS TO INFORM PARENTS ABOUT SLEEPWEAR PRODUCTS AND THE EDUCATION AND TRAINING PROGRAMS WILL BE ENHANCED. THESE AMENDMENTS ALSO HELP REDUCE CONFUSION BETWEEN WHAT IS CONSIDERED SLEEPWEAR, UNDERWEAR AND PLAYWEAR. THIS PROVIDES THE CONSUMER AN INFORMED CHOICE TO PURCHASE COTTON GARMENTS WITH THEIR CHILDREN'S SAFETY PROTECTED. THE CPSC HAS STATED "(T) THIS AMENDMENT ENABLES CONSUMERS WHO PREFER TO PUT THEIR CHILDREN IN BED IN COTTON GARMENTS, TO CHOOSE SAFER, SNUG-FITTING GARMENTS RATHER THAN LOOSE-FITTING DAYWEAR, SUCH AS T-SHIRTS AND SWEATS."

I SUPPORT CPSC'S DECISION TO AMEND THE CHILDREN'S SLEEPWEAR FLAMMABILITY STANDARDS AND AGREE WITH CPSC'S THAT THIS AMENDMENT OFFERS THE CONSUMER SAFER SLEEPWEAR ALTERNATIVES AND THAT **CPSC SHOULD NOT REVOKE THE AMENDMENT.**

SINCERELY,

KAYE G. RIDINGS

MARK ABBOTT
RT. 2, BOX 74
HARLINGEN, TEXAS 78550

210-423-1400 OFFICE

210-423-4521 FAX

SLEEPWEAR REVOCATION

We support maintaining the amendments, which authorize manufacture and sale of complying untreated cotton products as children's sleepwear.

By allowing this it will not relax safety consideration and snug fitting products still have to pass the general wearing apparel standard. Also loose-fitting sleepwear products are still required to pass a severe flame test.

There is informative education materials about children's sleepwear products. The amendments help reduce confusion about what is sleepwear, underwear, and playwear which gives the consumer an informed choice to purchase cotton garments with their safety protected.

We also strongly support CPSC's decision to amend the children's sleepwear flammability standards and agree that this amendment offers the consumer safer sleepwear alternatives and CPSC should not revoke the amendment.

Maxine Abbott
RT. 2, BOX 75 (210) 748-2367
Harlingen, Texas 78550



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Mrs. John A. Abbott
Rt. 2 Box 75
Harlingen, Texas 78550

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Ladies For Cotton
Route 2, Box 75
Harlingen, Texas 78550

SLEEPWEAR REVOCATION

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THE HARLINGEN GIN CO.

RT. 2, BOX 74

HARLINGEN, TEXAS 78550

210-423-1400 OFFICE

210-423-4521 FAX

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D.L. SMITH FARMS
RT. 2, BOX 305
HARLINGEN, TEXAS 78550
210-423-1400 OFFICE

210-428-8788 RES

210-423-4521 FAX

SLEEPWEAR REVOCATION

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VIRGINIA FIRE & LIFE SAFETY COALITION

CHAIR PERSON
Keith Arnold
VA. Dept Of Fire Programs
Office Phone/Fax 757 426-9328
E-mail VAFLSECORD@AOL.COM

1704 Eastborn Drive
Virginia Beach, VA. 23454

March 16, 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 amendment 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 the 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 this protection has worked.

Some argue that there has been no increase in the number of burn injuries and death 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 anything 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 materials 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.

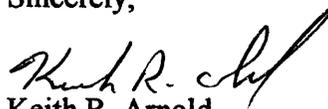
Infants deserve more protection not less.

The CPSC's decision to relax the fire safety standard was made with the understanding that the manufacture's 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 the garment is not flame resistant are difficult to understand, and almost uniformly written in English- making it impossible for our non English speaking citizens to understand the 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.

If you are unsure of the true need for this stricter standard I urge you to visit a burn center or spend some time at one of the many burn camps around the country you will find this to be an eye opening experience and you will truly see why we members of the Virginia Fire & Life Safety Coalition urge you to make the right decision for our children's sake. Thank you.

Sincerely,



Keith R. Arnold
Chairperson

Author: "Sandra Burns" <DBurns@carolina.net> at INTERNET-MAIL
Date: 3/14/99 5:45 PM
Priority: Normal
TO: <cpsc-os@cpsc.gov> at internet-mail
BCC: Todd A. Stevenson at CPSC-HQ1
Subject: Sleepwear Revocation
1204 Shepherd Avenue
Laurinburg, NC 28352
March 14, 1999

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

RE: Sleepwear Revocation

Dear Sir or Madam:

The purpose of this correspondence is to encourage you to allow the manufacture and sale of untreated cotton products for children's sleepwear.

I applaud your attention to child safety issues, and I join you in concern for these issues. In the case of cotton sleepwear for children, a manufactured snug fitting garment would be a safe option.

My own children wore cotton sleepwear. We feel safe with untreated cotton garments for sleeping. Please make this an option for all parents to choose snug cotton sleepwear for their children.

Thank you for your continued work for the safety of our children, and a special thanks for your help in allowing parents the option of choosing safe, untreated snug-fitting cotton sleepwear.

Sincerely,

Sandra W. Burns

CF 99-1-81

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

March 10, 1999

~~1,246~~
1,246

CPSC/OFFICE OF
THE SECRETARY

1999 MAR 15 P 1:58
Received 6173 Copies
Evelyn Hallway

Re: Sleepwear Revocation

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Sincerely,

Laura Stromphauer