



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

CPSA 6 (b)(1) Cleared

No Mfrs/PrvtLbrs or

Products Identified

Excepted by *Paluby*

Firms Notified,

Comments Processed.

MEMORANDUM

DATE: 3/29/99

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

ATTACHED ARE ADDITIONAL COMMENTS ON THE CF99-1

<u>COMMENT</u>	<u>DATE</u>	<u>SIGNED BY</u>	<u>AFFILIATION</u>
CF99-1-147	3/26/99	Steven Dietz Captain	Bakersfield Firefighters Burn Foundation 7912 Westwold Dr, Station 9 Bakersfield, CA 93309
CF99-1-148	3/29/99	L.L. Orie, Chief & R.L. Ware, Fire Marshal & Lisa King, Fire & Life Safety Education Officer	Newport News Fire Dept. City Hall Building 2400 Washington Ave Newport News, VA 23607
CF99-1-149	3/29/99	Senators Bill Roth Joe Biden Paul Wellstone Paul Sarbanes Chris Dodd James Jeffords	United States Senate Washington, DC 20510
CF99-1-150	3/30/99	Thomas Lamar Exe Director	Palouse-Clearwater Environmental Institute P.O. Box 8596 112 West 4 <sup>th</sup> St Moscow, ID 83843

CF99-1-151	3/30/99	Congressman Larry Combest Chairman Committee on Agriculture	U.S. House of Representatives Washington, DC 20515
CF99-1-152	3/30/99	Brian Golightly Angela Golightly	11 Olivia Court Baltimore, MD 21220
CF99-1-153	3/30/99	Consumers (4)	
Form letters In support of Sleepwear Revocation			
CF99-1-154	4/1/99	Frederick Yates Rosemary Yates	4489 Reservoir Rd Geneseo, NY 14454
CF99-1-155	4/1/99	Prof Staff Burn Unit (16)	Avera McKennan Hospital 800 East 21 <sup>st</sup> St P.O. Box 5045 Sioux Falls, SD 57117
CF99-1-156	4/5/99	Al Vedel Fire Chief	City of Olivette 9473 Olive Blvd Olivette, Missouri 63132
CF99-1-157	4/6/99	Consumers (1,450)	
Form letters In support of Sleepwear Revocation			

Total Number of Comments: 3,155



7912 WESTWOLD DR. • STATION 9 • BAKERSFIELD • CA • 93309  
BUS. PHONE (805) 861-9036

CF99-1-149

CPSC/DFC OF THE SECRETARY  
FREEDOM OF INFORMATION

1999 MAR 26 P 2:24

A 501C3 Non-Profit Organization  
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Cheryl K. O'Brien, AFLAC

David A. Huff, Good Samaritan Hospital

Kevin Fahey, Fahey Photography

Danielle Duffel  
R. L. Hardcastle Co., Inc.

Brenda K. Barnes D.P.M.  
Podiatric Physician and Surgeon

Buzz Grider  
Jennings Transfer & Storage

March 23, 1999

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

RE: Sleepwear Revocation

My twenty years plus with the fire service and fifteen years involvement with burn education and burn survivor support services has made me a strong advocate of the flammability standards for children's sleepwear. The immediate reinstatement of the stricter CPSC standard is of utmost importance.

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 their clothing catches fire. We must be diligent in ensuring that this extremely vulnerable group is adequately protected.

As a member of the fire service and 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,

Steven Dietz, Captain  
Bakersfield City Fire Department



NEWPORT NEWS FIRE DEPARTMENT  
CITY HALL BUILDING  
2400 WASHINGTON AVE  
NEWPORT NEWS, VIRGINIA 23607

CF 99-1-149



CPSC/OFFICE OF  
THE SECRETARY

1999 MAR 29 A 10:40

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 amendments to the Flammable Fabrics Act, and to return to stronger fire safety standards that have helped to keep children safe for more than twenty-five years.

As you know, after passage of a stronger 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 the flammability of children's sleepwear.

There are several problems with the revised standard 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. The combination of non-flame resistant material and large, baggy clothing can be lethal.

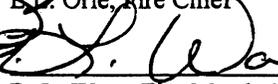
The revised standard which exempts sleepwear for infants nine months and younger from any fire safety regulations is even more dangerous. Since many infants at this age are crawling, they could be vulnerable to an exposed flame.

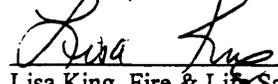
The CPSC's decision to relax the fire safety standard was made with the understanding that the manufacturer would fund a substantial public awareness campaign so that consumers would understand the importance of dressing their children in tight-fitting clothes. The campaign has not materialized. Furthermore, 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, and therefore does not inform non-English speaking citizens.

The CPSC is the premier agency for protecting our children's safety. We urge you not to send the wrong message to parents. Please return to the stronger fire safety standard which was in place in 1996 to help protect children from needless injuries and deaths.

Sincerely,

  
L. L. Orle, Fire Chief

  
R. L. Ware, Fire Marshal

  
Lisa King, Fire & Life Safety Education Officer

CF99-1-149

United States Senate  
WASHINGTON, DC 20510

CPSC/OFFICE OF  
THE SECRETARY

1999 MAR 29 P 2:34

February 19, 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 to enhance 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.

When the CPSC made its decision to relax the fire safety standard, it was done with the understanding that the manufacturers' industry 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 and strengthen 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,

Bill Roth  
Joe I. Rubin  
Paul Willstone

Paul Sarbanes  
Chris Dodd  
James M. Jeffords

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\_\_\_\_\_  
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CF 99-1 ~~150~~

# Palouse-Clearwater Environmental Institute

P. O. Box 8596  
112 West 4th St.  
Moscow, ID 83843-1096  
phone (208)882-1444; fax (208)882-8029  
e-mail pcei@pcei.org  
<http://www.moscow.com/pcei>

OFFICE OF THE SECRETARY  
MARCH 30 A 10:29

March 22, 1999

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

Re: Sleepwear Revocation

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 why 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,



Thomas C. Lamar  
Executive Director (and father of three)

LARRY COMBEST, TEXAS,  
CHAIRMAN  
BILL BARRETT, NEBRASKA,  
VICE CHAIRMAN  
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DOUG OSE, CALIFORNIA  
ROBIN HAYES, NORTH CAROLINA  
ERNEST L. FLETCHER, KENTUCKY

## U.S. House of Representatives Committee on Agriculture

Room 1301, Longworth House Office Building  
Washington, DC 20515-6001

(202) 225-2171  
(202) 225-0917 FAX

March 26, 1999

CF99-1-15k  
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DAVID D. PHELPS, ILLINOIS  
KEN LUCAS, KENTUCKY  
MIKE THOMPSON, CALIFORNIA  
BARON P. HILL, INDIANA

WILLIAM E. O'CONNOR, JR.  
STAFF DIRECTOR  
LANCE KOTTSCHWAR  
CHIEF COUNSEL  
STEPHEN HATERIUS,  
MINORITY STAFF DIRECTOR

Ms. Ann Brown  
Chairwoman  
U.S. Consumer Product Safety Commission  
Washington, D.C. 20207

RE: Children's Sleepwear Flammability Standards

Dear Chairwoman Brown:

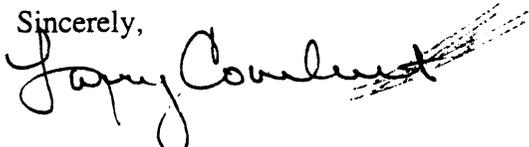
I appreciate this opportunity to comment on the Consumer Product Safety Commission's proposal to revoke the 1996 amendment to the Children's Sleepwear Flammability Standards, which allows the manufacture and sale of certain snug-fitting cotton apparel for children's sleepwear. I sincerely urge the Commission not to revoke this amendment. This issue is very important to those I represent, and I appreciate your careful consideration.

I am well aware of and would only compliment the Commission for the hard work, exhaustive research and extensive hearings conducted to support the 1996 amendment. I believe this decision appropriately recognized and affirmed both consumer preference for cotton clothing, and the relative safety of snug-fitting cotton sleepwear. Providing consumers with a safe alternative that meets their tastes makes eminent sense as we seek to reduce the number of fire-related injuries suffered by children and families.

As you know, when issues such as this come before the Congress for debate, highly emotional and politically expedient rhetoric often overshadow careful, studied arguments. In my opinion, critical decisions such as this, that profoundly affect so many, should be based upon sound facts and heard in a scientific forum. I am pleased that your agency has again structured a careful review of the issue. I trust that when this process is complete, you will come to the same decision you did in 1996 and the Commission will not revoke the amendment to the Children's Sleepwear Flammability Standards.

Again, thank you for the opportunity to share my views.

Sincerely,



Larry Combest  
Chairman

1999 MAR 30 P 3:15  
CPSC/OFFICE OF  
THE SECRETARY

CP 99-1-152

March 8, 1999

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

CPSC/OFFICE OF  
THE SECRETARY

1999 MAR 30 A 10:25

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 the 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 which we believe will put children in danger in the future.

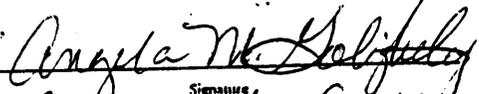
The revised standard which exempts "tight fitting" sleepwear in children's sizes up to 14 is based on the assumption that parents will dress their children in tight fitting clothes. Anyone who has bought clothes for a child knows that you do not buy something that fits tightly—you buy something big enough 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 clothing made of materials which are not resistant to fire and sleepwear that is not tight fitting, may be lethal.

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,

  
Signature  
ANGELA M. GOLLIGORSKY  
Printed name

CF99-1-153

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

March , 1999

CPSC/OFFICE OF  
THE SECRETARY  
1999 MAR 31 A 10:19

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.

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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,



CF99-1-154

March 3, 1999

CPSC/OFC OF THE SECRETARY  
FREEDOM OF INFORMATION

1999 MAR 32 A 8 29

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.

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.

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The revised standard which exempts "tight fitting" sleepwear in children's sizes up to 14 is based on the assumption that parents or guardians will dress their children in tight fitting clothes. Anyone who has bought clothes for a child knows that 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 nonflammable resistant material and large baggy clothing can be lethal.

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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 sent 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,

*Rosemary J. Yates*  
\_\_\_\_\_  
Signature  
*Frederick A. Yates*  
\_\_\_\_\_  
Printed Name

CPSC/OFC OF THE SECRETARY  
FREEDOM OF INFORMATION  
1999 APR - 1 A 8 30

March, 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.

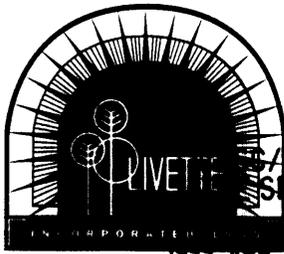
- Burn injuries and deaths are preventable, and safe sleepwear for infants and young children is a critical part of any prevention initiative. In particular, infants younger than 9 months are dependent on others to protect them from danger - they are generally incapable of removing themselves from the fire sources 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 Avera McKennan Hospital 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,

*Linda Karbo*



OFFICE OF  
SECRETARY

1111 APR - 5 P 4: 11

**CITY OF OLIVETTE**  
A COMMUNITY OF PLANNED PROGRESS

9473 Olive Boulevard  
Olivette, Missouri 63132  
Phone (314) 993-0408  
Fax (314) 993-8135  
Email [olivette@inlink.com](mailto:olivette@inlink.com)

CF99-456

FOR  
EMERGENCY

**9 1 1**

Al Wedel  
Fire Chief

**FIRE DEPARTMENT**

Larry Janes  
Asst. Fire Chief

March 30, 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 reinstates 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, 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 purchased 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 was 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 Fire & EMS Service 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 in fire safety,

Al Wedel, Fire Chief  
Olivette Fire Department

CC American Burn Association  
Government

CF99-1-157

(1,450)

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.

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 the 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 which we believe will put 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 fitting clothes. Anyone who has bought clothes for a child knows that 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 clothing made of materials which are not resistant to fire and sleepwear that is not tight fitting, may be lethal.

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,

  
\_\_\_\_\_  
Signature  
Joseph J. Espino  
\_\_\_\_\_  
Printed name