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August 29, 1973

Anthony F. Essaye, Esquire
Royall, Koegel & Wells
1730 K. Street, N.W.
Washington, D. C. 20006

Dear Tony:

This is in response to your letter of July 3, 1973, in which you indicate problems mattress manufacturers are encountering in obtaining appropriate sheets and binding tape to comply with the requirements of the Flammability Standard for Mattresses.

The Commission recognizes the potential problem in the supply of 100 percent combed cotton percale sheets, as indicated by the amendment to section .4(b)(6) of the Standard, which allows approval of other types of sheets. A Commission investigation has revealed at least two current manufacturers of appropriate cotton percale sheets: [redacted] Therefore, the Commission does not see an immediate need to approve alternate types of sheets on an interim basis.

As to binding tape, it is our opinion that the definition of "mattress prototype" in section .1(h) of the Standard would allow temporary substitution of other types of tape, provided data submitted shows to the Commission's satisfaction that the alternate tape is not less cigarette resistant than the polyester tape. We will be happy to review any data submitted on this point.

Sincerely,

Michael A. Brown
Acting General Counsel

MAFreeston/MABrown:tdr:8/29/73
cc: Secretary - Official Files
S. Parent
GC Files
GC Chron
M. Freeston

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