Mr. [redacted]
Vice President, Research
[redacted]
[redacted] Illinois [redacted]

Dear Mr. Collier:

This letter is in response to your January 28, 1974, request for a "variation" from the requirements of the full-size crib regulations published November 21, 1973 (38 F.R. 32129), for your product, the "[redacted]"

An evaluation of your request revealed that the [redacted] interior width is only 20 inches. This is 5-3/8 inches less than the width necessary for a crib to be considered a "full-size baby crib" as defined in section 1508.1(a) of the regulations. Since the [redacted] does not meet the definition of a "full-size baby crib," it is not subject to the regulations, and a variation is therefore not necessary.

Please do not hesitate to contact us if you have any further questions regarding this matter.

Sincerely,

Michael A. Brown
General Counsel

prepared by Bert Simpson/OSCA/DSL (4-1-74):clb:4/5/74

cc: Secretary (disposition of petition No. HP-74-8
Executive Director "
OSCA, Attn. Bert Simpson "
BCM "
OFC (to be distributed to Area Directors)
S. Lemberg
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GC Chron
GC Reading

ADVISORY OPINION