



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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STATEMENT OF COMMISSIONER NANCY NORD
ON THE VOTE TO APPROVE THE PROPOSED STANDARDS FOR FULL-SIZED AND
NON-FULL SIZED CRIBS UNDER SECTION 104 OF THE CPSIA
July 14, 2010

Protection of infants and toddlers is one of the Commission's most important roles and it is a role we have taken very seriously throughout our history. I fully support our long-standing and ongoing effort to get unsafe cribs out of consumer's hands. Therefore, I was pleased to join my colleagues today to publish in the *Federal Register* a draft NPR proposing standards for full-size and non-full size cribs, which is a critical element of that effort.

This draft regulation builds on continuing robust work by the Commission to address hazards in cribs. This draft NPR includes requirements developed from the 1996 ANPR addressing crib slat integrity and reflects work from the 2008 ANPR that resulted in substantial revisions to the ASTM voluntary standards in 2009 and 2010. It is also informed by data developed through the pilot Early Warning System initiated in 2008.

The proposed rule is a very strong standard that will address all aspects of crib construction and provide an effective margin of safety. I do have a concern, however, about the effective date and that the retroactive nature of the language in Section 104(c) (1) of the CPSIA will have a significant impact on the availability of compliant cribs. In addition to the prohibition on the sale of inventory and the resale of used cribs, day care centers and hotels will no longer be able to use their cribs when this rule goes into effect.

I urge industry and other affected parties to pay special attention to the questions raised in the Requests for Comments section of the NPR asking for information on such issues as: the effective date, the size of retailer inventory, the typical rate of turn-over, and the number of cribs in day care centers and hotels. We need your comments so we will have a basis to determine a realistic timeframe to make sure there is sufficient inventory available to deal with the demands this rule will create. We certainly do not want to create a situation where people stop using cribs and place their babies to sleep in unsafe environments.