



UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

STATEMENT OF COMMISSIONER THOMAS H. MOORE ON THE
FINAL STANDARDS FOR FULL-SIZE AND NON-FULL-SIZE CRIBS
UNDER SECTION 104 OF THE CONSUMER PRODUCT SAFETY
IMPROVEMENT ACT AND REVOCATION OF
16 C.F.R. PARTS 1508 AND 1509
December 15, 2010

The crib provisions in section 104 of the Consumer Product Safety Improvement Act of 2008 (CPSIA) contain some of the most far-reaching requirements in that Act. With recognition of that reach, I am voting today to implement them in a manner that is consistent with their intention of providing a safer sleeping environment for young children and to implement them in a manner that is mindful of the effects that the provisions will have on those who are subject to their mandates.

As a result of the actions taken by the Commission today, a new mandatory standard for full-size and non full-size cribs will become effective next year. When the new mandatory crib standard takes effect, every crib made, sold, or re-sold in this country will have to comply with that new, tougher standard. Our staff has worked extremely hard to identify safety issues associated with crib construction and to incorporate testing requirements into the new standard targeted to address those issues. Over time, as old cribs are replaced with cribs that meet the new mandatory standard, we should see a dramatic drop in the deaths of infants from unsafe cribs. It will not happen overnight as cribs tend to have a fairly long useful life and even though they cannot be resold, cribs in homes are often given to friends and relatives when they are no longer needed by their original purchaser. While the Act is far-reaching, it cannot reach into consumers' homes to remove those older cribs.

In addition to those who traditionally are affected by a new mandatory standard—manufacturers, importers and retailers—the CPSIA treats cribs as it has treated no other product category by prohibiting certain crib users and providers from using cribs that do not meet the new standard, effectively banning further use of those older cribs. Close to one million cribs will need to be replaced to meet this statutory requirement—an estimated 775,000 in child care centers and 160,000 in places of public accommodations. This is in addition to the 2.4 million cribs sold each year to households, for a one-time increase in demand of up to 43 percent. I believe that this surge in demand necessitates a reasonable, measured phase-in period for manufacturers to step up production, for retailers to make room for increased inventory and for those who will have to replace their cribs to budget for and obtain complying products.

Let me make this clear to all, my preference would have been to make **all** aspects of the crib standard effective in six months because the safety of children has always been my highest priority. But the realities of the marketplace and the enormity of the changes being required of so many business entities across the country, called for a more careful rollout of this unparalleled

national crib safety initiative. I believe having manufacturers comply first and begin to produce the large number of new cribs that are necessary to meet user demand and to then give those users time to come into compliance will assure greater compliance in the long run and lead to the safer infant sleeping environment envisioned by the CPSIA.

I would like to thank all who have played an essential role in this important step to providing a much needed added measure of safety to our young children's sleeping environment. The benefits of our action today will be saving the lives of innocent babies.