

**U.S. Consumer Product Safety Commission  
LOG OF MEETING**

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**SUBJECT: Third Party Testing Requirements for Children's Mattresses**

**DATE OF MEETING: November 9, 2010**

**LOG ENTRY SOURCE: Pamela L. Weller**

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**LOCATION: Room 725, CPSC headquarters**

**CPSC ATTENDEE(S): Pamela L. Weller and Michael Gougisha, Counselors to  
Commissioner Thomas H. Moore; Patricia K. Adair, Director, Division of  
Combustion and Fire Sciences, Directorate for Engineering Sciences**

**NON-CPSC ATTENDEE(S): Ryan Trainer and Christopher Hudgins, International  
Sleep Products Association (ISPA)**

**SUMMARY OF MEETING: This was a followup to the letter ISPA sent to the  
Commission dated September 17, 2010 as part of Docket CPSC-2010 (comment  
85). Mr. Trainer summarized their outstanding requests as follows:**

**1. Allow all mattress prototype testing that has been done since the effective  
date of Part 1633 (open flame testing of mattresses) by accredited third party labs  
to be "grandfathered" in and not have to be retested. Mr. Trainer said that most  
prototype testing was done by third party labs that are already approved by CPSC  
and that the testing has not changed since the standard became effective. He**

**said that many of the original prototypes are still being used and that it would be expensive to retest them. Mr. Hudgins said that some crib mattress manufacturers might have to retest as many as 25 prototypes unless given relief.**

**With regard to Part 1632 cigarette ignition testing, ISPA would like a delay in the effective date for third party testing. Mr. Trainer indicated this testing has historically been done in-house, rather than by third party laboratories. He said there was a lot of denial in the industry about the CPSC actually requiring such testing and that the lack of standard reference material cigarettes for testing was a problem. They wanted an orderly transition to third party testing. He also emphasized the short time frame in which the Commission had to act to address these issues as the requirements would go into effect on November 16<sup>th</sup>.**

**Mr. Hudgins brought up the issue of the testing and certification rule that is pending before the Commission and noted that ISPA had filed a comment in that proceeding indicating that the test methods in the mattresses standards should be considered to be a "reasonable testing program" for purposes of that rule.**

**Ms. Weller and Mr. Gougisha thanked them for their presentation and the meeting concluded.**