



UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
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Memorandum
OFFICE OF COMMISSIONER
NANCY A. NORD

Date: March 11, 2010

TO : Celestine Kiss
Division of Human Factors
Directorate for Engineering Sciences

FROM : Nancy A. Nord
Commissioner

SUBJECT : Follow up questions from the Toddler Bed NPR briefing on March 10, 2010

1. At the briefing I asked how staff would go about obtaining information to provide the Commissioners a better understanding of the economic impact of this proposed standard. Staff responded that a request for this information could be included in the Notice of Proposed Rule. What other steps could staff undertake to provide an analysis of the economic impact of the new rule?
2. I would like to pick up on an issue raised by Commissioner Northup about the height of the toddler beds. Since 87% of the injury data is related to falls out of beds, why doesn't the proposed rule address the height of the toddler bed in addition to the height of the guard rail?
3. On page 39 of the briefing package, staff states that six months will be sufficient time for manufacturers to comply with the new requirements in the proposed rule. What data did staff use to base this determination?

rh 3/12/2010

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