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LOG OF MEETING
DIRECTORATE FOR ENGINEERING SCIENCES

SUBJECT: Meeting of ASTM Subcommittee F15.30 for Bunk Beds
DATE OF MEETING: July 18, 1995 ✓ **PLACE:** Marriott Motel
Greensboro, NC, Airport
LOG ENTRY SOURCE: John Preston, ES *JP*
DATE OF ENTRY: July 21, 1995
COMMISSION ATTENDEES: John Preston, ES

NON-COMMISSION ATTENDEES:

Joe Ziolkowski, AFMA	Carl Bandy, Lexington
Karen Matkins, Diversified Testing	Kathy Carrick, Sears
Bobby Puett, Diversified Testing	Billy Chitwood, Bassett
Kathy Blahitka, J.C. Penney	André Dallaire, Amisco
Walter Harder, Pallister Furniture	Mike Jordan, Rosalco
Phil Davis, H & H Furniture Mfrs.	Danny Hodges, Bassett
Geoffry Jackson, Vermont Woodworks	Trip Hutchinson, Lexington
Jed Johnsrud, Cargo Furniture	Mark James, Lea Industries
H. E. Haley, Stanley Furniture	Michael Kryger, D.T.L.
Dave Macintosh, L. Powell Co.	John Lampe, Thomasville
Sonny Morgan, Barn Door Furniture	Pat Martin, ISPA
Paul Pottschmidt, Leggitt & Platt	Nancy Nelson, A.I.G. Designs
Bill Suvak, Childcraft	Allan Sheres, Jerig, Inc.
Mark Woodhams, Woodcrest Mfg.	Michael White, Broyhill Furn.
Jaffrey Strendberg, Colby Furn.	Jim Wall, This-End-Up

SUMMARY OF MEETING:

After a self introduction of the attendees, the subcommittee chairman, Mr. Ziolkowski, stated that the main purpose of the meeting was to respond to a letter from the Consumer Product Safety Commission (CPSC) staff (see attached 4/27/95 letter from John Preston) requesting certain revisions to requirements in the ASTM voluntary standard for bunk beds, ASTM F1427. The chairman stated that one of these requests was for the American Furniture Manufacturers Association (AFMA) to reconsider its previous negative response to a CPSC staff request to establish and sponsor a third party certification program. He said that this request was not within the scope of the activities of the ASTM F15.30 subcommittee and therefore, would not be discussed. The chairman asked Mr. Preston to summarize the other requests in the letter and the reasons they were sent to the ASTM Bunk Bed Subcommittee.

Preston stated that, in March 1995, the CPSC staff briefed the Commission on the subject of bunk beds. The staff had recommended that the Commission not begin a rulemaking proceeding ✓

but, instead, recommended that the Commission send a letter to the ASTM F15.30 Subcommittee requesting certain changes to the bunk bed voluntary standard and for AFMA to reconsider a previous negative response to a request to sponsor a third party certification program. Prior to a Commission decision on the staff's recommendation, Preston said he was asked to draft such a letter and forward it to the ASTM F15.30 subcommittee. He noted that the letter, dated 4/27/95, had been mailed to subcommittee members with the announcement of this meeting.

Preston said that the first request, to extend the requirements addressing entrapment in end structures to the lower bunk, had been previously rejected by the subcommittee on the grounds that no fatalities had been associated with entrapment in this area of bunk beds. He said that it appeared that there were now two fatalities associated with such entrapments and he added that, as a result of a single entrapment fatality in the end structure of a toddler bed, an ASTM standard for toddler beds was being drafted by the ASTM Juvenile Products Subcommittee.

The second request in the letter was to reduce the verbiage on the warning label and to include on this label the manufacturers intended mattress size for the bunks. He noted that a CPSC staff-suggested warning label was enclosed with the 4/27/95 letter.

The third request was to require the name and address of either the manufacturer, distributor, or seller on the bed. Preston noted that the current standard permits the manufacturer to be identified by a code that does not permit a consumer to identify the source of a bunk bed. He noted that the absence of identification of the manufacturer of several metal bunk beds recalled in 1994 had caused much confusion to consumers with metal beds.

Finally, the letter requested the AFMA to sponsor a third party bunk bed certification campaign which the chairman had stated was not within the scope of this subcommittee. Preston noted that such a certification program had been established by an independent testing laboratory but only nine manufacturers of bunk beds had joined the program.

The chairman opened the meeting to discussion on the CPSC staff requests.

A manufacturer noted that the current entrapment requirements for the upper bunk limit the width of all openings to less than 3½ inches. He suggested that if entrapment requirements were developed for the lower bunk that openings greater than 9 inches in width be permitted since these also would not present an entrapment hazard. Preston responded by stating that he agreed with the manufacturer's suggestion.

Another manufacturer questioned the need for entrapment requirements for the lower bunk when only two fatalities appeared to have occurred. He said that CPSC data showed that over the period 1990-1994, 267 children had died from entrapment in beds that were not bunk beds. He asked Preston what the CPSC staff planned to do about those deaths. Preston responded that he had not seen the CPSC entrapment data on the beds that the manufacturer referenced. However, he added that his personal advise to manufacturers of any bed intended for use by children was to design headboards and footboards that would not present an entrapment hazard.

Another manufacturer displayed an illustration of a bunk bed that had an opening in the end structure that, even if it were greater in width than 9 inches could still present an entrapment hazard since the mattress partially blocked the opening. In further discussion on such openings, it was agreed that a requirement could be written in a manner that would limit openings in the area of the lower bunk mattress to less than 3½ inches and permit openings greater than 9 inches only in areas of the structure where mattress encroachment would not occur.

There was additional discussion of the definition of a bunk bed. The current standard states that a bunk bed is defined as any bed in which the underside of the foundation is over 35 inches from the floor. Therefore, loft beds and L-shaped bunk beds are in the scope of the standard if they have a mattress support that is over 35 inches from the floor. A question was asked if these beds would also be subject to a lower bunk entrapment requirement if such a requirement was drafted. During discussion on this question, it was the opinion of the members present that there would have to be a new definition of a bunk bed if the lower bunk was to be subject to entrapment requirements.

A manufacturer asked if a bunk bed ladder would be subject to requirements addressing entrapment in the lower bunk end structure. In response, it was agreed that it would be subject if it was located in the end structure rather than on the side of a bunk bed.

Another manufacturer noted that in May 1995, the CPSC issued a joint press release with 11 bunk bed manufacturers that announced a recall of certain bunk beds because they did not conform to the requirements in the current ASTM standard addressing entrapment on the upper bunk. He said he was concerned that, if the subcommittee agreed to the CPSC request to include the lower bunk end structure in the requirements addressing entrapment, the CPSC might, at some future date, demand a recall of bunk beds not meeting such requirements. In response, John Preston stated that the May 9, 1995 recall of bunk beds had been initiated because the CPSC staff had made a determination that these beds presented a substantial risk of injury due to entrapment in the structure

of the upper bunk. He noted that a bed produced by El Rancho Furniture had previously been involved in a fatal entrapment incident and had been the subject of an earlier recall because it had openings in the structure of the upper bunk that presented an entrapment hazard. The bunk beds, recalled in May 1995, had openings that were similar in size to that of the El Rancho bed and, therefore, were determined to present a similar entrapment hazard as the El Rancho beds. Preston noted that recalls that are initiated under the Section 15 provision in the Federal Hazardous Substances Act (FHSA) generally are in response to an incident involving a death or serious injury.

The subcommittee chairman suggested that manufacturers of bunk beds should consider how the CPSC request impacts on their production and be prepared to discuss this issue at a future meeting. He also explained the ASTM voting procedures and urged that any manufacturers who were present at this meeting who were not currently ASTM members that they should submit an application to join this organization.

Discussion turned to the CPSC request to consider the adoption of a staff-suggested warning label that would reduce the verbiage of the current label and include on the label the intended mattress size. The staff request also suggested that the size of the intended mattress be stated on the shipping container.

It was noted by the chairman, that the current warning label is available from AFMA upon request. Copies of this label were distributed to the attendees at the meeting.

In discussion of the CPSC staff-suggested warning label (enclosed with the 4/27/95 letter), it was noted that consumers may not attach both of the guardrails that are supplied for use on the upper bunk. Therefore, the statement "use guardrails on both sides of upper bunk" on the current warning label should not be deleted.

In regard to adding the size (width, length and thickness) of the intended mattress to the warning label, there was considerable discussion. Several manufacturers believed that the statement: "Mattress must be at least 5 inches below upper edge of guardrails" was a significant message to consumers and should be retained. The CPSC staff-suggested warning label would not require this message since the suggested label would specify the actual intended size of the mattress that would assure that this 5 inch dimension would exist.

During discussion on the mattress size information, it was noted that some "cheap" mattresses that are claimed to be "twin bed size" may have smaller dimensions than more expensive mattresses. It was therefore believed to be superior, from the point of view of safety, to specify the actual size of a mattress by

dimensions, rather than by its accepted common name, such as "twin" or "double," etc. A representative of the International Sleep Products Association (ISPA) agreed with this discussion.

A motion to reject the CPSC staff-suggested changes to the warning label requirements and retain the existing warning label in the ASTM voluntary standard was approved unanimously.

In regard to the CPSC staff suggestion that mattress size information should be on the shipping carton as well as on a label on the bed, most members at the meeting believed this would be of little value to a consumer. These members stated that most consumers would not see the shipping carton until their bunk bed purchase was delivered to their home by the retail store from whom they had made the purchase. It was also noted that a bunk bed may be shipped in several different containers. End structures may be in a different carton from the side rails. The same end structures may use different side rails depending on the model of the bed.

One manufacturer stated that he believed that the most important safety message to convey to consumers who purchase bunk beds is to inform them that they should prohibit children under 6 years on the upper bunk and this should be stated on the shipping container. Another manufacturer suggested that, since the mattress size is required to be in the instructions, the shipping carton should contain the statement "Always read Instructions."

Several manufacturers again noted that in many bunk bed purchases, such as those made from a catalog or a furniture store, the consumer does not see the shipping carton until it is delivered to their home. Therefore, having the mattress size information on the carton would have little value. Discussion ended after it was observed that, since the CPSC staff request to include the size of the intended mattress on the warning label had been rejected, why should it be placed on the shipping carton.

The third CPSC staff suggestion in the 4/27/95 letter to the subcommittee concerned the identification of either the manufacturer, distributor or seller by name and address to provide a consumer with a contact in the event of a safety problem or to purchase replacement parts.

During discussion on this request it was noted that the name and address of a foreign manufacturer would be of little value to a consumer. Therefore, it was suggested that only a business with a U.S. address be permitted. A Canadian manufacturer suggested including businesses in that country. Although no formal motion was made to accept this CPSC suggestion, those present at the meeting appeared to be receptive to changing the standard in accordance with the suggestion. An offer by John Preston to

draft language for the requirement (at 6.1 of the current standard) was accepted.

The next meeting of the F15.30 subcommittee was scheduled for September 27, 1995, at which language for the identification of manufacturer, distributor or seller will be considered for inclusion in 6.1 of the standard, and discussion of entrapment requirements for the lower bunk will continue.

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