

February 10, 2025

TRANSMITTED VIA EMAIL

David Campbell

Task Group Lead Bassinets Mattress, Floor, and Latching  
Scott Lewis

Subcommittee Chairman for ASTM Bassinets and Cradles  
ASTM International  
100 Barr Harbor Dr.  
West Conshohocken, PA 19428-2959

RE: ASTM Ballot F15 (25-01), Item 1, Revision of F2194-2022E1 *Consumer Safety Specification for Bassinets and Cradles*

Dear Mr. Campbell and Mr. Lewis,

CPSC staff appreciates the opportunity to comment<sup>1</sup> on Ballot F15 (25-01), Item 1. Staff recognizes and values the diligence and hard work of the task group and task group lead in preparing the recommendations for balloting. However, staff is casting a negative vote.

Staff's negative vote is based on the following items (strikethroughs and underlines are only used in this letter to identify proposed changes, bold text is part of the ballot):

1. Line 11, Section 3.1.9, *mattress support rods/bars* – So as not to exclude non-segmented mattress supports, staff recommends changing the language as follows:

*Mattress support rods/bars, n* – component(s), typically rods or bars **located below the mattress support(s)**, that provide added support ~~between~~ for the mattress support(s) **panels of a segmented mattress** ~~component and~~ or the mattress.

2. Line 25, Section 6.5.1 – The proposed list of possible configurations is split into five configurations with redundant language. Staff recommends the following changes to reduce the number of configurations to three to make the list clearer and more concise:

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<sup>1</sup> These comments were prepared by the CPSC staff. They have not been reviewed or approved by, and may not represent the views of, the Commission.

Each product shall be sold with ~~the a~~ mattress included and floor in only one of the following configurations:

- with a ~~segmented~~ mattress without resilient material below the floor
- ~~with a non-segmented mattress without resilient material below the floor~~
- ~~with a separate mattress with a segmented floor structure without resilient material below the floor~~
- with a ~~separate~~ mattress with resilient material below the floor
- without a mattress with resilient material below the floor ~~without a separate mattress.~~

3. Line 26, Section 6.5.2 – Staff proposes the following changes to the language for clarity:

“The filling material of the uncompressed mattress such as foam, fiberfill, etc. shall not exceed 1-in. (25-mm) in thickness. The total thickness of the uncompressed mattress including all fabric or vinyl layers, filling material, mattress supports included inside the mattress, and any separate segmented floor structures ~~structural members such as wood, hardboard, etc.,~~ shall not exceed 1 1/2 in. (38 mm).”

4. Line 35 – The rationale for Line 34, Section 6.5.Y.2.2, is presented in the “Proposed Requirement/Change” column without a preceding “Note” to indicate it is informational only. Staff recommends the purpose of the text be clarified by labeling the text accordingly or moving the text to the “Rationale” section in future ballots.

5. Line 93, *Angle Measurement for Bassinets Intended for Two Occupants* – The explanation for the proposed language, “Change based on CPSC comment,” is presented in the “Proposed Requirement/Change” column; however, staff infers that this explanation is not intended to be included in the standard.

6. Line 118, Section 7.9.2 – The proposed added language, “... if a mattress is included with the product,” may be misinterpreted to mean the step is only required if a mattress is included with the product. Staff recommends changing the wording to read: “... without removing any provided mattress.”

7. Line 121, Section 7.9.5 – As written, the proposed language may be misinterpreted to mean the test is only required if a mattress is included with the product. Staff recommends changing the second sentence to read: “Replace mattress in the product (if provided) and repeat 7.9.2 – 7.9.4.”

8. Line 127, NOTE 5 – This requirement could feasibly apply not just to segmented mattresses, but also to any removable mattress with an integrated mattress support. Similarly, it should not be limited to bassinets with resilient material below the floor that folds. Staff therefore recommends keeping the first sentence as currently written in F2194-22e1 “NOTE 5—For those mattresses that are integral with the mattress support, do not remove the mattress and perform all angle measurements for 7.10 on a 6 by 6 by 3/8-in. nominal aluminum block placed on the mattress.” The proposed second sentence should be changed as follows: “For those products ~~with a floor with resilient material below the floor that folds when the product is folded,~~ perform all angle measurements for 7.10 on a 6 by 6 by 3/8-in. nominal aluminum block placed on ~~top of~~

the floor.”

9. Line 129, Section 7.10.2.1 –Staff recommends the following changes to the proposed new wording to make it clearer and more precise: “Place the inclinometer as close as possible to the center of ~~on~~ the mattress support or, segmented floor structure. Alternatively, place the inclinometer on a, ~~or on a~~ 6 by 6 by 3/8-in. nominal aluminum block placed onto the mattress or floor as close as possible to the center of the mattress or floor. ~~placed on the segmented mattress or floor as close as possible to the center of the mattress support, segmented mattress, segmented floor structure, or floor or as close as possible.~~ Care should be taken to avoid seams, snap fasteners, or other items that may affect the measurement reading.”
10. Line 148, Section 7.10.4.4 –Staff recommends the following changes to make the proposed language clearer and more concise: “Place the inclinometer as close as possible to the center of ~~on~~ the mattress support, segmented mattress, segmented floor structure, or floor ~~at the approximate center of the mattress support, segmented mattress, segmented floor structure, or floor or as close as possible to the center.~~”
11. Line 163, NOTE 8 – Similar to the comment on Line 127, this note should not be limited to segmented mattresses. Staff recommends retaining the first sentence as currently written in F2194-22e1: “NOTE 8—For those mattresses that are integral with the mattress support, do not remove the mattress and perform all angle measurements for 7.12 on a 6 by 6 by 3/8-in. nominal aluminum block placed on the center of the mattress.” The proposed second sentence references the incorrect test and should be changed as follows: “For those products with resilient material below the floor, perform all angle measurements for 7.10~~2~~ on a 6 by 6 by 3/8-in. nominal aluminum block placed on the floor.”
12. Line 165, Section 7.12.5.1 – Staff recommends the following changes to make the first sentence clearer and more precise: “If the base/stand supports the removable bassinet bed in any unlocked position, place the inclinometer as close as possible to the center of ~~on~~ the mattress support, segmented mattress, segmented floor structure or floor ~~at the approximate center of the mattress support, segmented mattress, segmented floor structure or floor.~~ Care should be taken to avoid seams, snap fasteners, or other items that may affect the measurement reading. Record the angle measurement.”
13. Line 179, Section 8.6.2.1 – The proposed additional warnings should not be included here because they are addressed in Lines 180 and 181. Staff accordingly recommends the following deletion: “~~Include the warning required in 8.6.2.1.1 here as part of this warning list or include the warning statement in 8.6.2.1.2 on the surface of the floor.~~”
14. Line 180, Section 8.6.2.1.1 – The bulleted statement should be preceded by a bullet (·) rather than an asterisk (\*).
15. Line 181, Section 8.6.2.1.2 – The bulleted statement should be preceded by a bullet (·) rather than an asterisk (\*).

16. Line 181, Section 8.6.2.1.2 – Because the warning message is intended for consumers, who may not understand what is meant by saying padding is below the floor, staff suggests changing the warning to: “For products not provided with a separate, removable mattress, the following warning shall be on the surface of the floor: ~~shall be addressed. \* Mattress padding provided below floor. NEVER add a mattress~~ “Sleep surface is padded, **do not add a mattress.**””

Additionally, staff provides the following editorial comments:

Line 21, Section 3.1.D (New section), has two TYPOS – Delete repeated words “may be” and change “weigh” to “weight.”

Staff appreciates your willingness to work together with staff and stakeholders to establish performance requirements to make bassinets safer for infants and caregivers.

Staff looks forward to discussing our comments at the next task group or subcommittee meeting.

Sincerely,



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Bassinet Project Manager  
Directorate for Engineering Sciences

cc: Molly Lynyak, Manager, ASTM Technical Committee Operations  
Don Mays, Chair, ASTM F15 Subcommittee  
Jacqueline Campbell, CPSC Voluntary Standards Coordinator  
Daniel Taxier, CPSC Children’s Program Manager