

February 10, 2025

TRANSMITTED VIA EMAIL

David Campbell

Task Group Lead Bassinets Mattress, Floor, and Latching

Jennifer King

Subcommittee Chairman for ASTM Non-Full-Size Cribs and Play Yards

ASTM International

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West Conshohocken, PA 19428-2959

RE: ASTM Ballot F15 (25-01), Item 2 Revision of F0406-2024 Consumer Safety Specification for Non-Full-Size Baby Cribs/Play Yards WK88664

Dear Mr. Campbell and Ms. King,

CPSC staff appreciates the opportunity to comment¹ on Ballot F15 (25-01), Item 2. 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:

1. Line 8, Section 3.1.15 – This definition of “floor” does not allow the term’s usage for non-full-size cribs, and therefore would not allow non-full-size cribs with padded floors. Please clarify whether this is intended. As written, this ballot would remove non-full-size cribs from the mattress requirement in section 5.16.1 due to the exclusive use of “floor” for mesh/fabric units.
2. Line 37, Section 5.16.1 – Given that the proposed definition of “floor” only applies to mesh/fabric units, staff recommends listing the possible configurations as applicable only for mesh/fabric units. Also, the list of possible configurations should be clearer and more concise, as the current proposal is split into five configurations with redundant language. Staff’s recommended text is as follows:²

Each product, other than those that are designed exclusively for play and not

¹ 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.

² Refer to staff’s editorial note on Line 10 of the ballot regarding usage of “mesh/fabric unit” vs. “mesh/fabric product.”

for sleep, and are intended to be used without a mattress, shall be sold with the mattress included, or mesh/fabric units shall have resilient material below the floor. Mesh/fabric units designed for sleep shall be sold 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 38, Section 5.16.2 – Staff proposes the following changes to the language for clarity: “For mesh/fabric products, 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. Lines 72 and 73 – Staff suggests retaining the term “floor support” to ensure fabric surfaces underneath mattress supports are at least as strong as sides, ends, and floor. (For example, the bottom layer of fabric in Figure Y-1.) The text should read as follows: “Fabric materials used for sides, ends, floor, or floor support, excluding mesh ...”.
5. Lines 75 and 76 – Staff suggests retaining “floor support” and adding “floor,” consistent with the suggested changes for lines 72 and 73.
6. Line 81 – The rationale for Line 80, Section 7.X.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 the future ballots.
7. Line 157, Section 9/4/2/11 – The warning message is intended for consumers, and they may not understand what is meant by saying padding is “below the floor.” Staff suggests the following edit for clarity: “For products intended to be used without a separate mattress included with the product and with resilient filling material below the floor, the following warning shall be on the surface of the floor addressed: •Sleep surface is padded, do not add a mattress.” (bolding is recommended).

Additionally, staff provides the following editorial comments:

1. Line 10, Section 3.1.17 – This defines the term “mesh/fabric unit,” but throughout the ballot the term “mesh/fabric product” is also used. Staff recommends “mesh/fabric product” be changed to “mesh/fabric unit” since that is already defined.
2. Line 81, TYPO – “intended too” should read “intended to.”
3. Line 132 – This section of the ballot is incorrectly copied from F406. Staff suggests

correcting it if there are future ballots.

4. Line 135, Section 8.28.3.1 – “vertical force of 5 s” should read “vertical force over 5 s.” This is an error in the existing text.
5. Line 142, Section 8.31.4 – Change “a horizontal test surface” to “athe horizontal test surface” to clarify that the horizontal test surface is the same surface the product is being tested on.
6. Line 156 – This section doesn’t need to be changed due to the revised definition of “mattress” as a removable pad.

Staff appreciates your willingness to work together with staff and all stakeholders to establish performance requirements to make non-full-size cribs and play yards safer for infants and caregivers.

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

Sincerely,



Celestine T. Kish
Bassinet Project Manager
Directorate for Engineering Sciences

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