

April 14, 2025

TRANSMITTED VIA EMAIL

Scott Lewis

Subcommittee Chairman for ASTM Bassinets and Cradles

Jennifer King

Elevated Surfaces Hazards & Incident Data Review Task Group Lead

ASTM International

100 Barr Harbor Dr.

West Conshohocken, PA 19428-2959

RE: ASTM Ballot F15 (25-06), Item 6, Revision of F2194-2022E1 *Consumer Safety Specification for Bassinets and Cradles*

Dear Mr. Lewis and Ms. King,

CPSC staff<sup>1</sup> appreciates the opportunity to comment on Ballot F15 (25-06), Item 6. Staff recognizes that this ballot seeks to address some of the identified hazards associated with bassinets; however, several areas critical to the safety of bassinets/cradles are insufficient to address known hazard patterns. Therefore, staff cast a negative vote.

Staff's primary concerns and focus of the negative vote are with the following:

1) Section 6.12, *Bassinet Structural Elements* – Bassinets/cradles shall comply with either 6.12.1 (*Side Wall Integrity and Occupant Support*) OR 6.12.2 (*Minimum Bassinet/Cradle Height*).

ASTM's ballot would require bassinets to have either *Side Wall Integrity and Occupant Support* (6.12.1) OR a minimum height of 16 inches (6.12.2). Such requirement would still permit short, portable compact bassinets, even though all references to compact bassinets have been deleted in this ballot. A bassinet with a short external height is portable and can still be placed on elevated and soft surfaces posing a risk to the infant (e.g., infant can fall or can end up in a compromised position.)<sup>2</sup> In September 2022, the Commission rejected the revised bassinet standard not only because it was weaker than the current bassinet

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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.

<sup>2</sup> <https://www.cpsc.gov/s3fs-public/ASTMs-Notice-of-a-Revised-Voluntary-Standard-for-Bassinets-and-Cradles.pdf?VersionId=x73F5OmeW4AJujWJEq8.kBZ28aTFLb2x>

standard, but because it would have allowed the sale of compact bassinets, an entire class of unsafe and less stable products that are currently prohibited under the ISP [Infant Sleep Products] Rule.<sup>3</sup>

2) Section 6.14, *Lateral Sleep Surface Angles* - Based on a review of incidents and product testing, staff assesses that the proposed side-to-side tilt restriction of 7 degrees does not adequately address infant rolling and suffocation hazards.

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

Sincerely,

A handwritten signature in black ink that reads "Celestine T. Kish". The signature is written in a cursive style with a large initial 'C' and 'K'.

Celestine T. Kish  
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

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<sup>3</sup> <https://www.cpsc.gov/s3fs-public/RCA-ASTMs-Notice-of-a-Revised-Voluntary-Standards-for-Bassinets-and-Cradles.pdf?VersionId=cfj.qZe5KITS2AY3G69UwltalltP4LRk>