



April 29, 2025

Ms. Joan Lawrence, ASTM F15.22 Subcommittee Chair  
Mr. Jos Huxley, ASTM F15.22 Task Group Chair  
ASTM International  
100 Barr Harbor Drive  
West Conshohocken, PA 19428

Dear Ms. Lawrence and Mr. Huxley:

In March 2025, CPSC staff<sup>1</sup> received the in-depth investigation (IDI) report, IDI 250106HCC3305, involving the death of a two-year-old male victim and a toy kitchen (children's play kitchen with accessories). During the interview, the father stated that his children typically climb onto the toy kitchen. Investigators observed that the toy kitchen contained sturdy metal hooks to hang pots and pans and contained an open back. CPSC staff's review indicates that the child intended to climb on and through the toy kitchen, but the sweater he was wearing got caught on one of the metal hooks, resulting in death by asphyxia due to ligature strangulation.

While there are no performance requirements in ASTM F963, *Standard Consumer Safety Specification for Toy Safety*, to address this specific hazard for these types of toys, there are design guidelines applicable to crib toys under §A3.2, which states that "Designs for all products intended to be attached to cribs or playpens should be accomplished in a manner that minimizes the potential for strings, ribbons, elastics, or **parts of clothing** to be caught on the product such as that an infant is placed in a dangerous predicament in which possible strangulation could occur."

CPSC staff recommends that the toy subcommittee explore extending these guidelines for crib toys to other children's toys and age groups to develop performance requirements that could mitigate strangulation hazards like this one in large and bulky toys. If you have any questions, or need additional information, please contact me at: [bmordecai@cpsc.gov](mailto:bmordecai@cpsc.gov), or (301) 987-2506.

Sincerely,

*Benjamin Mordecai*

Benjamin Mordecai  
Mechanical Engineer  
Project Manager, F963

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<sup>1</sup> CPSC staff prepared this letter. The Commission has not reviewed or approved this letter, and this letter may not represent the views of the Commission.

Cc: Molly Lynyak, ASTM F15 Staff Manager  
Donald Mays, ASTM F15 Chairman  
Susan Bathalon, CPSC Children's Program Area Risk Manager  
Daniel Taxier, CPSC Children's Program Manager  
Jacqueline Campbell, CPSC Voluntary Standards Coordinator