



August 17, 2022

Mr. David Halstead
Chair, ASTM Subcommittee F08.53 on Headgear and Helmets
ASTM International
100 Barr Harbor Drive
West Conshohocken, PA 19428

Dear Mr. Halstead,

U.S. Consumer Product Safety Commission (CPSC) staff¹ is interested in the proposed additions to ASTM F1446, *Standard Test Methods for Equipment and Procedures Used in Evaluating the Performance Characteristics of Protective Headgear* and ASTM F1447, *Standard Specification for Helmets Used in Recreational Bicycling or Roller Skating*, which were discussed at the ASTM meeting held May 2022 Committee Week. CPSC staff requests more details, rationale, and supporting evidence for these changes concerning the proposed additions and changes listed below:

- Low Impact Test
- Rebound Test
- Lowering the testing line, and
- Lowering the maximum permissible acceleration.

The safety standard for bicycle helmets that CPSC issued in 1998 (16 CFR part 1203) was developed to address primary hazards (skull fractures and related fatalities) identified in the incident data at the time. However, after the regulation went into effect and headgear safety technology continued to develop, nonfatal injury types have emerged in the incident data and have also become a public safety concern.

Staff encourages revisions that improve safety and maintain the safeguards provided by 16 CFR part 1203 through the development of test methods and standards that address these nonfatal injuries. To that end, CPSC staff is willing to provide data within our disclosure rules and other support for the development of the voluntary standards. Staff requests membership in an applicable task group to assist in the development of these changes. CPSC staff looks forward to working with you on this effort.

¹ The views expressed in this letter are those of CPSC staff and have not been reviewed or approved by, and may not reflect the views of, the Commission.



United States
Consumer Product Safety Commission

Sincerely,

Greg Ota

Greg Ota
Mechanical Engineer
Directorate for Laboratory Sciences

Enclosure(s): Jacqueline Campbell, CPSC Voluntary Standards Coordinator
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