



September 7, 2023

TRANSMITTED VIA EMAIL

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Task Group Lead Bassinets Elevated Surfaces
Scott Lewis (slewis@deltachildren.com)
Subcommittee Chairman for ASTM Bassinets and Cradles
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Dear Ms. King and Mr. Lewis,

I am writing to share the results of CPSC staff testing and evaluation related to the bassinet height and sleep surface height requirements.¹ As we have discussed in prior task group meetings and subcommittee meetings, we have been striving for ways to address the hazard of consumers using smaller bassinets, including bassinet accessories that can be used separately from the play yard or stroller, on soft, unstable, and/or hard elevated surfaces. During the December 14, 2022 in person task group meeting held at CPSC NPTEC, and as explained in more detail in a letter from me to you on April 27, 2023, CPSC staff and ASTM task group members proposed:

1. All bassinets must meet either a. or b.:
 - a. Top surface of the side rail is 16 inches or greater from the product support surface (*i.e.*, floor) (with current minimum side height of 7.5 inches). There are two ways to satisfy this option:
 - i. Removable legs/stand with collapse/failure of the bassinet when removed from the legs/stand.
 - ii. Bassinet does not have a removable stand.
 - b. Smallest lateral dimension shall be greater than 24 inches (side height is minimum 7.5 inches).² This reflects “wide footprint” items that resemble a small play yard and are unlikely to be placed on an elevated surface.

In continuing work to evaluate and address the hazard, staff has conducted more testing and ergonomic/anthropometric evaluation assessing likely use of smaller bassinets. Staff's

¹ The views or opinions expressed in this letter are solely those of the staff, and these views and opinions do not necessarily represent those of the Commission.

² 24 inches is greater than the seat depth of a typical sofa.

judgment is that the above recommendations will not prevent smaller bassinets from being used on soft, unstable, and/or hard elevated surfaces. For a variety of reasons, including to improve their posture while interacting with the baby, caregivers may choose to move the bassinet onto an elevated surface such as a countertop, dining table, coffee table, sofa, chair, or adult bed, despite this putting the infant at risk. Even a 50th percentile female (height 64 inches) would have to bend over considerably to access the child on the ground and thus staff assesses that caregivers are more likely to use the bassinet in combination with a raised surface. Because of this likelihood, staff assesses that the minimum height of 16 inches is not sufficient to discourage caregivers from using the bassinet on elevated surfaces and does not adequately address the hazard. Staff recommends an external side/rail height, measured from the floor to the top of the side/rail, be at a minimum height of 27 inches. In addition, staff recommends that the sleep surface be at a minimum of 15 inches from the floor. Figure 1 demonstrates a 27-inch-tall bassinet positioned on the floor (first image) and positioned on elevated surfaces. Bassinets 27 inches tall with 15-inch high sleep surface provide consumers with easier access to the infant without using the product on an elevated surface. In fact, if used on an elevated surface, access to the infant is compromised.

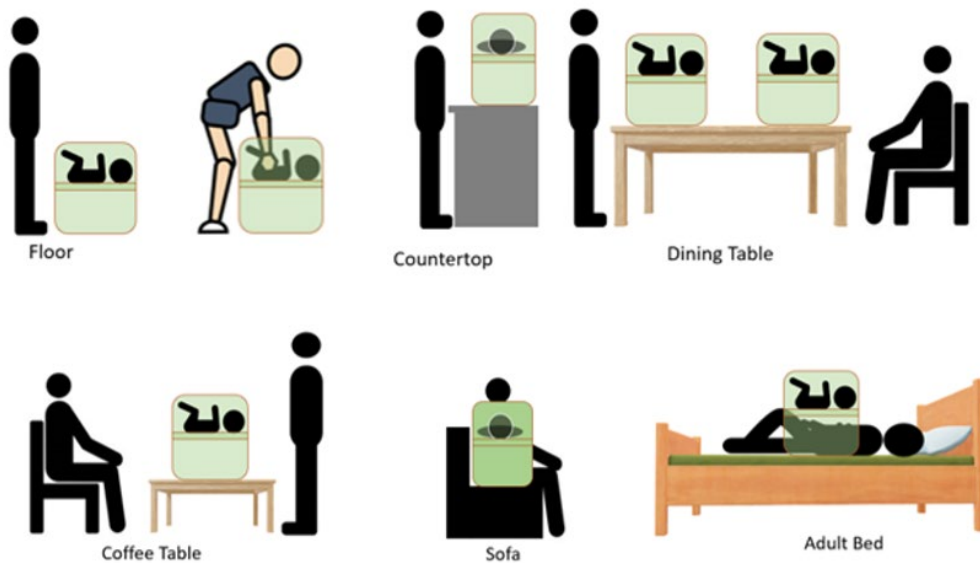


Figure 1 A 50th percentile female in relation to a bassinet with the proposed requirements on various surfaces.

CPSC staff appreciates your willingness to work together to establish performance requirements to make bassinets safer for infants and parents.

As always, we are happy to discuss at the next Task Group or Subcommittee Meeting.

Sincerely,

Celestine T. Kish
 Bassinet Project Manager
 Directorate for Engineering Sciences

cc: Molly Lynyak, Manager, Technical Committee Operations
Anna Carter, Task Group Lead for Cantilever Bassinet Tilt
Jacqueline Campbell, CPSC Voluntary Standards Coordinator
Daniel Taxier, Children's Program Manager