



December 18, 2023

TRANSMITTED VIA EMAIL

David Campbell (d.campbell@deca-inc.net)
Task Group Lead Bassinets Mattress Pad and Latching
Scott Lewis (slewis@deltachildren.com)
Subcommittee Chairman for ASTM Bassinets and Cradles
ASTM International
100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

RE: ASTM Ballot F15 (23-19), Item 2

Dear Mr. Campbell and Mr. Lewis,

I am writing to share CPSC staff's comments¹ and concerns with the bassinet mattress pad and latching task group's ballot in Ballot F15 (23-19), Item 2. Staff recognizes how hard the task group has worked to prepare the recommendations for balloting. However, for the reasons described below, staff is casting this negative vote.

Staff's negative vote concerns the following items:

1. Line 7 Section 3.1.3 Compact Bassinet/Cradle definition² – the performance requirement "...measured in accordance with 7.Z sleep surface support and the product support surface (floor)." should not be in the definition. A new performance requirement should be added to address the height of compact bassinets/cradles.
2. Line 23 Section 6.5.Y.1 (New Section) *Floor/Side Gap Horizontal Width* – This requirement does not fully address all horizontal gap configurations. Staff is concerned with removable resilient material under the floor that may create sidewall gaps that could present entrapments, especially if the product also has a removable mattress above the floor.

In addition, as written in the ballot, the actual test reference for measuring a gap is missing.

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 Staff objects to compact bassinets being in the bassinet standard but this recommendation is in response to the ballot.

3. Line 25 Section 6.5.Y.2.1 (New Section *Floor/Side Gap Vertical Depth*) – There is still confusion regarding products that have resilient material below the floor AND a removable mattress. Similar to the horizontal gap, this requirement appears to unnecessarily allow for potentially hazardous gaps.
4. Line 166 Section 7.Y (New Section *Floor/Side Gap Horizontal Gap Measurement*) – Several issues with this test still need to be clarified. Most concerning to staff is that this test method fails to address the flexibility of mesh/fabric sides creating a larger gap and is lacking specifications for test equipment to ensure consistent measurements. Another issue with this requirement is that not all bassinets have corners, therefore the filling material may not have corners. Also, does the floor have sides or does it intersect at the side of the product? Would "end of the floor" be more appropriate?
5. Line 176 Section 8.6.2.1 Warning Label – The warning label refers manufacturers to a non-existent section "8.6.2.2.2;" it should read "8.6.2.1.2".

The following are editorial comments:

1. Line 89 Section 7.8.2 *Sleep Surface Angle Measurement for Bassinets Intended for a Two Occupants*: The highlighted "a" should be deleted.
2. Line 162 Section 7.12.5.2 is a confusing sentence. Please consider rewording as "If the base/stand supports the removable bassinet bed and the angle of the mattress support, segmented mattress, segmented floor structure or floor surface is less than 20° from horizontal as measured in accordance with 7.12.5.1, evaluate whether the removable bassinet bed has a visual false latch/lock indicator per 6.11.4."
3. Line 163 Section 7.12.5.3 is a confusing sentence. Please consider rewording as "If the base/stand supports the removable bassinet bed and the angle of the mattress support, segmented mattress, segmented floor structure or floor surface is less than 20° from horizontal, as measured in accordance with 7.12.5.1, and the removable bassinet bed does not contain a visual false latch/lock indicator, test the unit in accordance with 7.4.2 – 7.4.7."
4. Line 169 Section 7.X.2 (new section) – "floor" is written twice, once at the beginning of the list of surfaces and once at the end. Should the first "floor" be replaced with "segmented mattress"?

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 our comments at the next Task Group or Subcommittee Meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Celestine T. Kish". The signature is written in a cursive style with a large initial 'C'.

Celestine T. Kish
Bassinets Project Manager
Directorate for Engineering Sciences

cc: Molly Lynyak, Manager, Technical Committee Operations
Jacqueline Campbell, CPSC Voluntary Standards Coordinator
Daniel Taxier, Children's Program Manager