United States
Consumer Product Safety Commission
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Ms. Jennifer King [Transmitted via email on February 11, 2022]
Chair, ASTM F15.18 Subcommittee on Play Yards and Non-Full-Size Cribs
ASTM International
100 Barr Harbor Drive
West Conshohocken, PA 19428

Dear Ms. King:

This letter is the U.S. Consumer Product Safety Commission (CPSC) staff's[1] response to ballot F15 (22-01), Item 5. Item 5 proposes a revision to section 5.16 of ASTM F406-19 *Standard Consumer Safety Specification for Non-Full-Size Baby Cribs/Play Yards* to modify the requirements for the thickness of play yard mattresses to allow up to 2 inches in thickness. For mattresses over 1.5 inches thick, the revision also adds: (1) a gap requirement no greater than ½ in. from the side of the mattress to the sidewall of the play yard, when the mattress is centered in the manufacturer's recommended use position, and (2) a gap measurement method based on a sliding gauge.

Staff votes negative on this ballot for the following reasons:

- The proposal does not ensure that the play yard's sidewall is stiff enough to prevent the formation of a hazardous pocket between the sidewall and mattress if the mattress is over 1.5 inch thick.
- The proposed test to measure the gap between the mattress and sidewall does not apply any force to the play yard's flexible sidewall. CPSC staff's preliminary testing shows that a play yard side can stretch out between 0.5 and 1.2 inches, when between 1 and 5 pounds of force was applied to the fabric wall.
- The proposal does not provide a rationale for the change in mattress thickness or maximum gap requirement. Staff requests the rationale for the proposed requirements be provided in the rationale section of the standard.

To address these concerns, staff recommends that the task group review the gap measurement test methodology to include a representative force between the play yard side and the mattress when measuring the gap between the mattress and sidewall. Staff also requests a rationale be included. CPSC staff will provide the task group with a proposed test method that includes an appropriate force.

Sincerely,

Celestine T. Kish
Sr. Engineering Psychologist
Directorate for Engineering Sciences

[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.

FREDERICK DEGRANO

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Frederick DeGrano
Mechanical Engineer
Directorate for Engineering Sciences

cc: Jacqueline Campbell – CPSC Voluntary Standards Coordinator
Molly Lynyak – Staff Manager, ASTM Committee F15 on Consumer Products

ASTM Ballot Item 5
(F1500000122005).p