



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
5 RESEARCH PLACE, ROCKVILLE, MD 20850

August 11, 2022

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

Dear Ms. Lawrence and Mr. Kaufman:

On August 4, 2021, CPSC staff sent a letter to the ASTM F15.22 Subcommittee Chair regarding inflatable infant bather products, which were identified as an *aquatic toy* in ASTM F963-17 section 3.1.4. The August 4 letter identified 26 incidents, including three deaths, with a date range of October 20, 2015, to October 20, 2020. Staff is aware of one additional incident during that period, bringing the total to 27.

In the year since August 4, 2021, there have been an additional three incidents reported, fortunately with no deaths. Details are enclosed. The incidents reflect that the straps of the neck float broke apart, and the infants became submerged under water. Clearly, this product needs immediate attention to address deficiencies in performance to mitigate the associated risks. However, ASTM has not made any progress on this matter. We urge ASTM to take immediate action.<sup>1</sup>

CPSC staff requests that the toy safety F15.22 subcommittee work to develop adequate safety performance requirements to address these incidents and to eliminate any future ones. If you have any questions, or need additional information, you can contact me at: [bmordecai@cpsc.gov](mailto:bmordecai@cpsc.gov), or at: (301) 987-2506.

Sincerely,

*Benjamin Mordecai*

Benjamin Mordecai  
Mechanical Engineer  
Project Manager, F963

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<sup>1</sup> 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.

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

Enclosure

Table 1: Additional Inflatable Baby/Infant Float Incidents

#	Date	Narrative
1	08/21	The straps for the neck broke and the child became submerged.
2	08/21	The clips came apart and the child became submerged.
3	11/21	The child began to submerge and then the straps separated.