



June 10, 2022

Patricia Edwards  
ASTM Subcommittee Chair for F15.70, Adult Safety Products  
ASTM International | 100 Bar Harbor Dr. | West Conshohocken, PA 19428

Dear Chair:

Staff<sup>1</sup> welcomes the initiation of the Revision Task Group at the last F15.70 subcommittee meeting on April 20, 2022, to review and revise the current version of ASTM F3186-17, *Standard Specification for Adult Portable Bed Rails and Related Products*<sup>2</sup>. After completing two rounds of compliance testing, staff plans to participate actively within the task group and discuss additional improvements throughout the standard's review process. Staff requests the task group to consider the issues and proposed solutions identified below.

Staff's primary concerns relate to the same sections brought up in the July 15, 2020 Staff Briefing Package<sup>3</sup>:

- A. The zone 3 entrapment performance requirement (§ 6.3.3) is inconsistent with the respective zone 3 entrapment test method (§ 8.4.5.4).
- B. The finger openings performance requirement (§ 6.4) references two different diameter ranges, uses two different systems of measurement, and is inconsistent with the figure referenced in the standard's text.

Staff's Concern A is that the zone 3 entrapment performance requirement in § 6.3.3 is redundant due to the failure criteria described in the associated test method, § 8.4.5.4. Staff believes that the failure criteria described in test method is the intended requirement, which would also be more consistent with the FDA guidance document referenced in the standard. In addition to staff's proposed language below, staff also suggests that the subcommittee develop a figure to visually clarify the requirements.

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<sup>1</sup> 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.

<sup>2</sup> ASTM F3186-17, *Standard Specification for Adult Portable Bed Rails and Related Products*, ASTM International, West Conshohocken, PA, 2017, [www.astm.org](http://www.astm.org).

<sup>3</sup> Staff Briefing Package, Update on Petition CP 13-1, Petition Requesting a Ban or Standard on Adult Portable Bed Rails, July 15, 2020. Retrieved from: <https://www.cpsc.gov/s3fs-public/Update%20on%20Petition%20CP%2013-1%20-%20Requesting%20a%20Ban%20or%20Mandatory%20Standard%20on%20Adult%20Portable%20Bed%20Rails.pdf?kiDixW5Z7x9xcOqjxSeS3QpvspdfQMBY>.



Proposed § 6.3.3: Zone 3 – When tested in accordance with § 8.4.5, the horizontal centerline on the face of the 4.75 in (120.65 mm) end of the test probe (see 7.2) shall be above the highest point of the uncompressed mattress.

Proposed § 8.4.5.4: Turn the cone until the centerline on the face of the 4.75 in (120.65 mm) end is horizontal and let the cone sink into the space by its own weight. (1) If the centerline on the face of the 4.75 in (120.65 mm) end of the cone is above the highest point of the uncompressed mattress, the space passes the test. (2) If the centerline on the face of the 4.75 in (120.65 mm) end of the cone is at or below the highest point of the uncompressed mattress, the space fails the test.

Staff's Concern B relates to inconsistent references for finger opening requirement. In § 6.4.1 the test requirement for finger openings refers to two different sets of diameters in two different unit systems. Staff believes that the test requirement must be clarified and propose language below that would harmonize the requirement with the format of other standards such as F833 (Carriages and Strollers), F2085 (children's Portable Bed Rails), and other durable children's products.

Proposed § 6.4.1: Holes or slots that extend entirely through a wall section of any rigid material less than 0.25 in (6.35 mm) thick and admit a 0.625 in (15.875 mm) diameter rod shall also admit a 1.0 in (25.4 mm) diameter rod. Holes or slots that are between 0.625 in (15.875 mm) and 1.0 in (25.4 mm) and have a wall thickness less than 0.25 in (6.35 mm) but are limited in depth to 0.375 in (9.525 mm) maximum by another rigid surface shall be permissible (see Fig. 2). The product shall be evaluated in all manufacturer's recommended use positions.

Staff's current proposed language for Concern B retains the 0.25 in wall thickness from the original requirement, but staff strongly recommends that the subcommittee consider increasing this value to 0.375 in in order to align the requirement with Figure 2 in the standard and with similar test requirements in several other established product safety standards.

Sincerely,

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United States  
**Consumer Product Safety Commission**

cc:

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