



**U.S. CONSUMER PRODUCT SAFETY COMMISSION
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September 24, 2018

Dear Manufacturer/Distributor/Importer/Retailer:

On January 10, 2018, the Portable Fuel Container Manufacturers Association (Association¹) asked the Office of Compliance and Field Operations for an 8-month grace period to comply with the testing and certification requirements of ASTM F2517-17 *Standard Specification for Determination of Child Resistance of Portable Fuel Containers for Consumer Use*, due to limited testing facility availability. After considering this request, on February 13, 2018, we granted a 9-month enforcement stay regarding certification to ASTM F2517-17 with an end date of September 12, 2018¹. On August 23, 2018, the Association requested an additional extension of the certification stay until December 31, 2018 to enable the completion of package testing to the provisions of ASTM F2517-17.

In its August 2018 request, the Association stated that during preparations for the recertification testing to ASTM F2517-17 some ambiguity in the test procedures was encountered by the testing bodies and that the ambiguities caused inconsistencies in the protocols. These ambiguities were resolved with CPSC staff through conference calls that took place on July 12 and July 19, 2018. However, difficulties in obtaining children for use in the panels over the summer led to additional delays, and the tests could not be completed until the subject children returned to school.

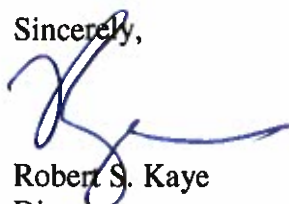
The Association further stated in ASTM subcommittee discussions on July 12 and 19 that the testing laboratories and industry determined that the changes to ASTM F2517-17 materially affected only the Child-Resistance part of the test protocol and not the Senior-Testing part of the test; therefore, additional Senior-Testing did not seem to be warranted. In view of the foregoing, it asked that the retest requirement for the Senior Testing part of ASTM F2517-17 be waived.

Based upon this new information, we agree that an additional extension of the previously granted enforcement stay is justified. In addition, we concur that retesting to the Senior Use Effectiveness portion of the test is not warranted. Accordingly, we will accept certification to the Child-Resistance and Senior-Testing sections of ASTM F2517-15 until December 31, 2018.

¹ (https://www.cpsc.gov/s3fs-public/CHPBA_Enforcement_date.pdf?QvUCoQ350QSn7xuoIMTNa1YfaoF8Rhc).

If you have any questions related to the CGBPA, please contact John Boja by email at jboja@cpsc.gov. We appreciate your continued cooperation and assistance.

Sincerely,



Robert S. Kaye
Director
Office of Compliance and Field Operations