



September 19, 2023

TRANSMITTED VIA EMAIL

Jessica Doyle and Barbara Himes  
Subcommittee Co-Chairs for ASTM Infant Feeding Supports  
ASTM International  
100 Barr Harbor Dr.  
West Conshohocken, PA 19428-2959

RE: ASTM Ballot F15 (23-13), Item No. 2, WK82241—Standard Consumer Safety Specification for Infant Feeding Supports

Dear Ms. Doyle and Ms. Himes:

Staff of the U.S. Consumer Product Safety Commission (CPSC) appreciates the ASTM Infant Feeding Supports subcommittee's continuing efforts to develop a new voluntary standard for infant feeding supports including nursing pillows, and the opportunity to provide comments on the associated ballot item, F15 (23-13), Item No. 2.

As you are likely aware, on September 8, 2023, the Commission voted unanimously (4–0) to approve publication of a notice of proposed rulemaking (NPR) for nursing pillows in the *Federal Register*.<sup>1</sup> Although the balloted draft voluntary standard for infant feeding supports includes several requirements that are similar to the Commission's proposed rule for nursing pillows, the two do not fully align. For example, the proposed rule includes an infant containment requirement that places limits on the allowable depth of the caregiver opening and includes provisions to address nursing pillows with caregiver attachments. CPSC staff recommends that the ASTM Infant Feeding Supports subcommittee adopt the measures proposed in the NPR, as the Commission has proposed to address the identified hazards. Additionally, CPSC welcomes comments from subcommittee members and the general public on the NPR, following its publication in the *Federal Register*.

Staff looks forward to continuing to work with you and the rest of the subcommittee to effectively address the known hazards with nursing pillows.

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<sup>1</sup> <https://www.cpsc.gov/s3fs-public/RCA-Notice-of-Proposed-Rulemaking-Safety-Standard-for-Nursing-Pillows.pdf>

Sincerely,

Timothy P. Smith  
Senior Human Factors Engineer  
CPSC Project Manager, Nursing Pillows Rulemaking  
Division of Human Factors, Directorate for Engineering Sciences

CC: Molly Lynyak, ASTM Committee F15 Staff Manager  
Jacqueline Campbell, CPSC Voluntary Standards Coordinator  
Daniel Taxier, CPSC Children's Program Manager