



April 27, 2023

TRANSMITTED VIA EMAIL

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Task Group Lead Bassinets Elevated Surfaces
Scott Lewis (slewis@deltachildren.com)
Subcommittee Chairman for ASTM Bassinets and Cradles
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Dear Ms. King and Mr. Lewis,

I am writing to convey the U.S. Consumer Product Safety Commission (CPSC) staff's appreciation for your willingness to work together to establish performance requirements that make bassinets unlikely to be used on elevated and soft surfaces. We are making good progress and I hope we can keep moving to improve sleep safety for infants.

After the February 28, 2023, Bassinet Elevated Surface Task Group meeting, staff discussed the proposed recommendations and has the following suggestions and clarifications. Based on the work of the Elevated Surface Task Group and the Cantilever Task Group, it is our understanding that the requirements can be broken into two categories as follows:

1. All bassinets must meet the following requirements:
 - a. Side height 7.5 inches (current)
 - b. Product stability (current)
 - c. Side Wall Deflection (new, to address issues with occupants rolling into or out of soft-sided products)
 - d. Sleep Surface Deflection (new)
 - e. Tilt Requirement (new)
 - f. Inclined Angle Test (current requirement, adding test)
 - g. Electrical/Battery Requirements (new)¹

2. In addition, all bassinets must meet either 2a or 2b:
 - a. Top surface of the side rail is 16 inches or greater from the product support surface (*i.e.*, floor) (with current minimum side height of 7.5 inches). There are two ways to

¹ Items c through g of Category 1 are discussed further below.

satisfy this option:

- i. Removable legs/stand with collapse/failure of the bassinet when removed



from the legs/stand.



- ii. Bassinet does not have a removable stand.

- b. Smallest lateral dimension shall be greater than 24 inches (side height is minimum 7.5 inches).² This reflects “wide footprint” items that resemble a small play yard and are unlikely to be placed on an elevated surface.



Staff proposes the following to address items 1c through 1g above.

- 1c. *Side Wall Deflection* (new, to address issues with occupants rolling into or out of soft-sided products). Because the ASTM F2194 Bassinet/Cradle standard already requires a product stability test that puts a 23 lb weight on the side and a 5 lb horizontal pull, a deflection measurement could be added to this test without having to create a new test. If the side wall deflects more than $\frac{1}{2}$ inch upon application of the loads, the bassinet would fail this requirement.
- 1d. *Sleep Surface Deflection* (new). Instead of creating a new test, staff proposes using the newly accepted crib mattress firmness test from Crib Mattress Regulation in 16 CFR Part 1241. The firmness test measures the actual sleep surface as opposed to the underside of the sleep surface.
- 1e. *Tilt Requirement* (new). While staff supports the testing proposal from the cantilever task group, staff is concerned with the rationale for a 7-degree maximum tilt angle. Infants should be sleeping on a firm, flat surface. Staff proposes requiring the lateral angle for all bassinets to be 0-degrees with a tolerance not to exceed 1 degree.
- 1f. *Inclined Angle Test*. ASTM F2194 has a 10-degree angle requirement, but no test requirement, so staff proposes including the inclined angle test from the Infant Sleep

² 24 inches is greater than the seat depth of a typical sofa.

Products Regulation in 16 C.F.R. § 1236.2(b)(19).

- 1g. *Electrical Requirements*. Incident data show complaints related to melting batteries that are similar to battery/electrical issues experienced with other juvenile products. Therefore, staff proposes including power system performance requirements similar to bouncers and swings.

As always, we are happy to discuss at the next Task Group or Subcommittee Meeting.

Sincerely,

A handwritten signature in black ink, reading "Celestine T. Kish". The signature is written in a cursive style with a large initial 'C' and 'K'.

Celestine T. Kish
Bassinet Project Manager
Directorate for Engineering Sciences

cc: Molly Lynyak, Manager, Technical Committee Operations
Anna Carter, Task Group Lead for Cantilever Bassinet Tilt
Jacqueline Campbell, CPSC Voluntary Standards Coordinator
Daniel Taxier, Children's Program Area Manager