

April 23, 2025

Rick Rosati  
ASTM F15.42 Furniture Subcommittee Chair  
100 Barr Harbor Drive  
West Conshohocken, PA 19428

Dear Mr. Rosati:

CPSC staff<sup>1</sup> is writing to inform the ASTM F15.42 Furniture Subcommittee of a new approach that manufacturers are taking to try to meet the stability requirements in ASTM F2057-23.

Recently, staff has encountered clothing storage units (CSUs) with components that protrude from the CSU to increase stability by moving the fulcrum forward relative to the center of gravity. Staff has seen two types of these components, as illustrated in Figure 1, below: 1) L-shaped bars that attach to the underside of the CSU, and 2) triangular components that fit over the front legs of the CSU.

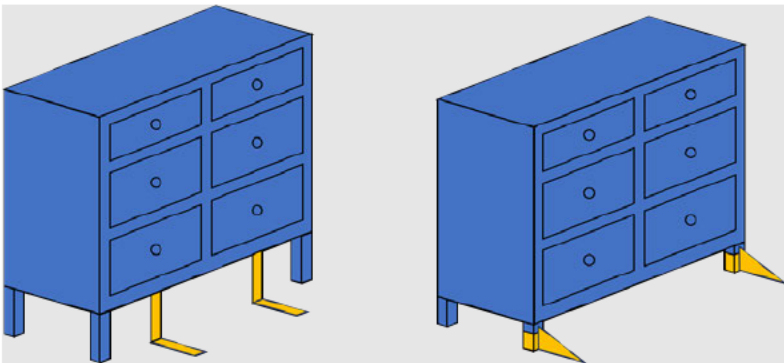


Figure 1. Drawing of two types of stability components on CSUs.

Some product assembly instructions describe these components as something that the consumer can “opt” to install; others include installation of the components as part of the normal consumer assembly process. Often, these components are not included in product marketing images and are inconsistent with the overall design, or style, of the CSUs. CSUs with these components can be assembled and used as a fully functional CSU without the components installed but will only meet ASTM F2057-23 stability requirements if installed.

Staff is concerned about any consumer-installed components or other features that are needed to

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<sup>1</sup> The views in this letter are those of the staff and have not been reviewed or approved by, and may not reflect the views of, the Commission.

pass stability requirements but are not required as part of the assembly and installation instruction, thereby increasing the risk of death and injury from a tip-over. Staff would find these units to be non-compliant. Additionally, the presence of these protrusions could pose a tripping hazard and may introduce a new hazard pattern with the associated product.

Staff asks that the ASTM F15.42 Furniture Subcommittee add a discussion on these components and similar features as a topic to the May 1, 2025 subcommittee meeting agenda.

Staff thanks you for your continued efforts to improve the safety of clothing storage units and looks forward to working with ASTM to reduce the risk of furniture tip-over.

Sincerely,

Kristen Talcott, Ph.D.  
*Clothing Storage Unit Project Manager*  
*Division of Human Factors*  
*Directorate for Engineering Sciences*

cc:

Molly Lynyak, *Staff Manager, ASTM Committee F15 on Consumer Products*  
Don Mays, *Chairman, ASTM Committee F15 on Consumer Products*  
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Daniel Taxier, *CPSC Children's Program Manager*