



April 29, 2025

TRANSMITTED VIA EMAIL

Sam Shamie
ASTM F15.18 Full-Size Cribs Subcommittee Chair
ASTM International
100 Bar Harbor Drive
West Conshohocken, PA 19428

Dear Mr. Shamie:

CPSC staff¹ appreciates the opportunity to comment on ballot F15 (25-08) item 1 – Revision of F1169 – 19 *Standard Consumer Safety Specification for Full-Size Baby Cribs*. Staff votes negative on the ballot item.

The ballot item revises the definition of full-size crib as: “a ***rigid sided*** bed that is designed to provide sleeping accommodations for an infant that is intended for use in the home and is within a range of +/- 2 in. (+-5.1 cm) of the interior length or width dimensions specified for full-size baby cribs in 5.7. **Any non rigid sided product that is sized as per 5.7 shall be considered a non full size crib and subject to the non full size standard F406.**”

Staff supports the stated goal of the ballot item – to address non-rigid-sided products being marketed as full-size cribs – and agrees that ASTM F406 *Standard Consumer Safety Specification for Play Yards and Non-Full-Size Cribs* is the appropriate standard to address such products. However, by adding the sentence on non-rigid-sided products, the ballot item attempts to define the scope of ASTM F406 and the requirements for non-rigid-sided products in the “full-size crib” definition, when these issues are better addressed within the scopes of ASTM F1169 or ASTM F406. Additionally, any requirements to address the hazards posed by play yards sized to accommodate a full-size crib mattress should be addressed in ASTM F406. Staff recommends the Full-Size Crib Subcommittee work with the Play Yard Subcommittee to address the issues raised in the ballot item in both ASTM F1169 and ASTM F406 and is happy to participate in this effort.

Staff thanks you for your continued efforts to improve the safety of full-size cribs and looks forward to

¹ 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.

working with ASTM to reduce the risk of entrapment in mesh-sided products.

Sincerely,



Daniel Taxier
Children's Program Manager
Division of Mechanical and Combustion Engineering
Directorate for Engineering Sciences



Celestine Kish
Senior Engineering Psychologist
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cc: Jennifer King – Subcommittee Chair, ASTM F15.18 Play Yards and Non-Full-Size Cribs
Molly Lynyak – Staff Manager, ASTM Committee F15 on Consumer Products
Donald Mays – Chairman, ASTM Committee F15 on Consumer Products
Jacqueline Campbell – CPSC Voluntary Standards Coordinator