



August 16, 2022

TRANSMITTED VIA EMAIL

Mr. Richard Rosati
Chair, ASTM F15.42 Furniture Safety Subcommittee
ASTM International
100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

Re: Negative Vote for ASTM Ballot F15 (22-11), Items 1-8

Dear Mr. Rosati:

U.S. Consumer Product Safety Commission (CPSC) staff¹ is casting a negative vote on the ballots for revisions to the ASTM F2057 Clothing Storage Unit (CSU) voluntary standard (F1500001122001, F1500001122002, F1500001122003, F1500001122004, F1500001122005, F1500001122006, F1500001122007, F1500001122008).

CPSC staff continues to be concerned that the ASTM F2057 voluntary standard, including the recent revisions that have passed and the revisions currently being balloted, still do not account for real-world tip over scenarios, such as a child climbing or pulling on a CSU with all the drawers filled and open.

The CPSC's notice of proposed rulemaking (NPR), Safety Standard for Clothing Storage Units (CSUs),² and the associated staff briefing package, Draft Notice of Proposed Rulemaking for Clothing Storage Units,³ have detailed discussions of the justifications for CSU requirements and test elements. Staff has previously described specific concerns about foreseeable tip overs that remain unaddressed in the currently balloted changes.

CPSC staff asserts that requirements like those in the NPR are necessary to address the hazard of CSU tip over and urges ASTM to adopt the NPR requirements in the ASTM F2057 voluntary standard.

Sincerely,

Kristen Talcott

¹ The views or opinions expressed in this letter are solely those of the staff, and these views and opinions do not necessarily represent those of the Commission.

² Consumer Product Safety Commission (2022). Safety Standard for Clothing Storage Units: Notice of proposed rulemaking. 87 Fed. Reg. 6246 (February 3, 2022). Docket No. CPSC-2017-0044. Available: <https://www.federalregister.gov/documents/2022/02/03/2022-01689/safety-standard-for-clothing-storage-units>

³ CPSC Staff (2021). Staff Briefing Package: Draft Notice of Proposed Rulemaking for Clothing Storage Units. July 2021. Available: https://cpsc.gov/s3fs-public/Proposed%20Rule-%20Safety%20Standard%20for%20Clothing%20Storage%20Units.pdf?OcybMVfa9ANi6sqiog7qkeNP48c_uz0T.

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cc: Molly Lynyak, Manager, Technical Committee Operations
Jacqueline Campbell, CPSC Voluntary Standards Coordinator