



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
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TRANSMITTED VIA EMAIL

Ms. Lisa Trofe  
Subcommittee Chairman for ASTM F15.19, Infant Bedding  
c/o ASTM International  
100 Barr Harbor Drive  
P.O. Box C700  
West Conshohocken, PA 19428-2959

Dear Ms. Trofe:

This letter responds to ASTM ballot F15 (19-09), item #10, *Revision Of F1917-2012 Consumer Safety Performance Specification for Infant Bedding and Related Accessories WK69670*. U.S. Consumer Product Safety Commission (CPSC) staff abstains from voting on this ballot item but supports the proposed revisions to ASTM F1917 – 12 outlined in the ballot. However, CPSC staff noticed two errors; specifically:

1. The section title in row 45 (section 6.2) should be changed from “Maximum Bumper Thickness” to “Maximum Crib Bumper/Liner Thickness.”
2. The note in row 86 (after proposed section 8.4.6.1) refers to a figure that shows examples of left aligned text. This figure is mistakenly given the same designation as the figure of the example warning label referenced in row 88 (proposed section 8.4.7): Figure X1. In the ballot, Figure X1 shows the example warning. The figure of left aligned text is missing.

In September 2019, CPSC staff delivered to the Commission a draft notice of proposed rulemaking (NPR) briefing package for crib bumpers/liners.<sup>1</sup> The Commission has not yet voted on staff’s draft proposed rule, so the following represents staff’s recommendations only.

Many of the proposed revisions in ASTM ballot F15 (19-09), item #10, align with CPSC staff’s previous recommendations to ASTM and are similar or identical to staff’s recommendations to the Commission. Staff reiterates and expands upon the recommendations previously made to

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<sup>1</sup> CPSC staff’s briefing package is available here: <https://www.cpsc.gov/s3fs-public/Proposed%20Rule%20-%20Safety%20Standard%20for%20Crib%20Bumpers-Liners%20Under%20the%20Danny%20..0.pdf>.

The views expressed in this letter are those of CPSC staff and have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

ASTM, including additional requirements and test methods beyond those addressed in the subject ballot. Staff's additional recommended revisions to ASTM F1917, based on staff's draft proposed rule, are summarized below. Staff recommends that the F15.19 Infant Bedding subcommittee consider these differences in future revisions to ASTM F1917:

- Replace the requirement for crib bumpers/liners to be capable of being secured at specific locations (section 5.4) with an attachment requirement and test method that would assess the ability of a crib bumper/liner to pull away from the side of a crib. Staff's proposed "Crib Bumper/Liner Entrapment in Openings" requirement would not permit passage of the small head probe used in ASTM F963, *Standard Consumer Safety Specification for Toy Safety* (ASTM F963 – 17, Fig. 10), between the installed crib bumper/liner and the crib side. This requirement and associated test method are based on the most recent consensus recommendations of the ASTM Crib Bumper/Liner Attachment task group, which currently is working on similar requirements and test methods.
- Add, to the maximum crib bumper/liner thickness requirement (section 6.2), a minimum rate of passage of a crib bumper/liner through the crib bumper/liner thickness test fixture, to more clearly delineate a pass from a fail for thick crib bumpers/liners.
- Add a finish requirement to the crib bumper/liner thickness test fixture (ASTM F1917 – 12, Fig. 1), to improve consistency among test fixtures, and therefore, reduce potential variation in test results for thick crib bumpers/liners.
- Add strength requirements for decorative components and crib bumper/liner seams. In addition, require the dimensional limits on attachment means (section 5.1) and decorative components (5.2) to apply both before and after the strength testing for those components has been performed.
- Add a supporting figure to the firmness test method that illustrates the intended test locations.
- Specify that the new mark or label that identifies which segments of a crib bumper/liner are intended for the short and long sides of the crib (ballot line 75) be required to be "in the English language at a minimum."
- Add a note to the warning requirements that refers the reader to ANSI Z535.1 for safety colors, per the latest Ad Hoc Language recommendations: "NOTE—For reference, ANSI Z535.1 provides a system for specifying safety colors."

Thank you for the opportunity to comment on this ballot item. CPSC staff looks forward to continuing to work with ASTM to improve and clarify the requirements of the ASTM F1917 voluntary standard.

Sincerely,

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Signed by: TIMOTHY SMITH

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CC: Molly Lynyak, Manager, Technical Committee Operations, ASTM International  
Patricia L. Edwards, CPSC Voluntary Standards Coordinator