



November 9, 2023

TRANSMITTED VIA EMAIL

Ms. Jennifer King
Chair, ASTM F15.18 Subcommittee on Play Yards and Non-Full-Size Cribs
ASTM International
100 Bar Harbor Drive
West Conshohocken, PA 19428

Dear Ms. King:

This letter is U.S. Consumer Product Safety Commission (CPSC) staff's¹ response to ballot F15 (23-17), Item 13, pertaining to the revision of ASTM F406 – 22, *Standard Consumer Safety Specification for Non-Full-Size Baby Cribs/Play Yards*. Item 13 proposes changes to the marking and labeling requirements in the standard, including language changes based on updates from the Ad Hoc Language Task Group.

CPSC staff abstains from voting on this ballot item. However, staff has the following comments:

- LN 1 – Editorial: Remove the hyphen in the first sentence in "...attaches to a-play yard..."
- LN 1 – Editorial: Remove the space in the first sentence between the "/" and "non-full size"
- LN 6 – This requirement specifies "included with a product", which could be interpreted as implying that the warnings are only required when the accessory is sold with a play yard or non-full-size crib, and therefore, accessories that are sold separately are out of scope for the labeling requirements. Recommend removing "included with a product" from the requirement.
- LN 6 – This section requires the main strangulation hazard warning to state "non-full size crib or play yard frames" while the sub-bullet of the warning specifies either a play yard or non-full-size crib. Recommend stating the specific product throughout the warning statement to be consistent.
- LN 6 – Editorial: The word "strangled" is not capitalized in the "Final Wording" column, but it is in all capital letters in the "Proposed Changes (Redline)" column and in the example warning (Fig. XX). Update the formatting in the "Final Wording" column to be consistent with the "Proposed Changes (Redline)" column.
- Fig. XX – Editorial: Remove "/NFS Crib" in the caption because the example warning label is specific to play yards.

Sincerely,

Frederick deGrano
Mechanical Engineer
Directorate for Engineering Sciences

cc: Jacqueline Campbell, CPSC Voluntary Standards Coordinator
Molly Lynyak, Staff Manager, ASTM Committee F15 on Consumer Products
Daniel Taxier, CPSC Children's Program Manager

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.