



November 7, 2023

TRANSMITTED VIA EMAIL

Mike Leshner
ASTM F15.19 Re-breathing Task Group Chair
ASTM International
100 Barr Harbor Drive
West Conshohocken, PA 19428

Dear Mr. Leshner,

U.S. Consumer Product Safety Commission (CPSC) staff¹ submits the following comments on work item WK84613 – Standard Test Method for Firmness of Infant Bedding.

5.0 Apparatus

In section 5.3, rather than specifying the instrument range of at least 20N, staff suggests allowing more flexibility, such as by stating the "range be at least twice the expected test range."

In section 5.4, the resolution of the device for measuring linear displacement, in inches, should be 0.039 in, not 0.038 in.

In section 5.6, CPSC staff recommends the following changes:

- The alignment of the force gauge to the probe centerline should be stated.
- Based on our testing experiences, we recommend the hardware to not be specified. Practically, a gauge may include its own threaded stud.
- In Figure 1, describe the threaded stud as "recommended."

8.0 Procedure

In section 8.5, change "elevated above" to "elevated above and perpendicular to."

In section 8.8, change "completely" to "substantially." Complete compression is never

¹ The views expressed in this letter are those of CPSC staff, and they have not been reviewed or approved by, and do not necessarily reflect the views of, the Commission.

reached.

In section 8.9, staff notes that if the product is not elastic, such as products with granular fill, the product may require shaking or similar adjustments between tests, because a rest time may not return the previously tested location to "normal."

Staff appreciates the work of the task group towards improving the safety of infant and juvenile products, and better understanding the hazards associated with such products. If you have any questions, you may contact me at: aajohnson@cpsc.gov, or (301) 504-7872.

Sincerely,

Ashley Johnson
Physiologist
Directorate for Health Sciences

cc: Molly Lynyak, ASTM F15 Staff Manager
Jailynn McGhee, JPMA Government Affairs Standards and Certification Associate
Jacqueline Campbell, CPSC Voluntary Standards Coordinator