



May 7, 2020

Mr. Jason Macari  
President and Chief Executive Officer  
Baby Delight Inc.  
30 Martin Street, Suite 3C  
Cumberland, RI 02864

Dear Mr. Macari:

Consumer Reports strongly urges Baby Delight to immediately stop producing and recall any infant inclined sleep product, including the Nestle Nook Portable Infant Lounger and the Go With Me Sway Portable Infant Rocker. Last November, Consumer Reports President and CEO Marta Tellado sent your company a letter urging quick action in light of evidence showing that inclined sleepers—which now are linked to at least 92 infant deaths—are not safe for infant sleep.<sup>1</sup> It is now more than one year since Fisher-Price and Kids II recalled over 5 million inclined sleepers, and as of today, six other manufacturers also have issued recalls for this type of product. Yet Baby Delight still has not yet joined their ranks and recalled its infant inclined sleep products.

Your company's continued failure to recall its inclined sleepers leaves infants at risk and muddles critical recommendations for consumers around safe infant sleep practices. Infant inclined sleep products are not safe for infant sleep, according to American Academy of Pediatrics recommendations,<sup>2</sup> a government-commissioned study,<sup>3</sup> and the harrowing experiences of families nationwide. We call on Baby Delight to take immediate action to eliminate infant inclined sleep products from the marketplace. This action would be in line with your responsibilities to your customers and consistent with the proposal by the Consumer Product Safety Commission (CPSC) to effectively prohibit these sleepers.<sup>4</sup>

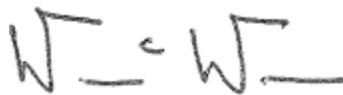
Consumers reasonably expect manufacturers to design and offer products that are safe, and to remove all hazardous products from the market. According to a 2019 Consumer Reports nationally representative survey, more than 90 percent of Americans say that “feeling a product or service is safe and will not cause them or their family members physical harm” is one of their high or top priorities.<sup>5</sup> Putting safety first is critical to securing consumers’ trust and sending the clearest messages to parents and caregivers about safe infant sleep practices. However, over the last year, some companies have attempted to keep infant inclined sleeper models on the market through minor marketing changes. These inclined sleepers remain on the market rebranded as “loungers,” “rockers,” or similar products, but with little or no change to their designs, and with confusing warning labels advising against using the product for “prolonged” or “unattended” sleep. This practice is fundamentally unreasonable and unacceptable because any duration of sleep at an incline puts babies at risk.

We have identified Baby Delight’s Nestle Nook Portable Infant Lounger and Go With Me Sway Portable Infant Rocker as still available for sale, with branding changes and no meaningful changes to their designs. In CR’s investigation, the only changes we found were made to the marketing and branding to remove some references to sleep and to move the products from your “Sleep & Slumber” category to your “Trek & Travel” category. However, references to sleep in the products continue to exist on your product pages and in the products’ instructions, implying that the products are safe for sleep. We also found some materials that continue to refer to the Nestle Nook product as a “napper.” Simply changing a product’s branding—without design changes and stronger warnings not to use the product for infant sleep of any duration—is deeply unfair to parents and caregivers and can all too easily leave them confused and their infants at risk.

Baby Delight must acknowledge the serious risks that inclined sleepers pose to infants, with expert research and numerous tragedies making the danger clear. We strongly urge Baby Delight to take action right away to stop producing and recall any inclined sleeper, and ensure that all future infant sleep products it produces adhere to the strong, mandatory safety standards for bassinets, cribs, or play yards.

Your urgent action is critical to infant safety. We request a response from you no later than Thursday, May 14.

Sincerely,



William Wallace  
Manager, Home and Safety Policy



Oriene Shin  
Policy Counsel

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<sup>1</sup> Consumer Reports, “Letters from CR President and CEO Marta Tellado to infant inclined sleeper manufacturers calling for immediate recalls” (Nov. 4, 2019) (online at: [advocacy.consumerreports.org/research/letters-to-infant-inclined-sleeper-manufacturers-nov-2019](https://www.consumerreports.org/research/letters-to-infant-inclined-sleeper-manufacturers-nov-2019)).

<sup>2</sup> AAP safe sleep recommendations include that babies should be placed alone to bed on a firm, flat surface in their own space, with no extra bedding. AAP, “SIDS and Other Sleep-Related Infant Deaths: Updated 2016 Recommendations for a Safe Infant Sleeping Environment.” (Nov. 2016) (online at: [pediatrics.aappublications.org/content/pediatrics/early/2016/10/20/peds.2016-2938.full.pdf](https://pediatrics.aappublications.org/content/pediatrics/early/2016/10/20/peds.2016-2938.full.pdf)).

<sup>3</sup> Mannen EM. Biomechanical Analysis of Inclined Sleep. Tab B of CPSC Staff Supplemental Briefing Package on Infant Sleep Products. 2019 (online at: [www.cpsc.gov/s3fs-public/SupplementalNoticeofProposedRulemakingforInfantSleepProducts\\_10\\_16\\_2019.pdf#page=91](https://www.cpsc.gov/s3fs-public/SupplementalNoticeofProposedRulemakingforInfantSleepProducts_10_16_2019.pdf#page=91)) at PDF p. 91.

<sup>4</sup> CPSC, Safety Standard for Infant Sleep Products, supplemental notice of proposed rulemaking (Nov. 12, 2019) (online at: [www.govinfo.gov/content/pkg/FR-2019-11-12/pdf/2019-23724.pdf](https://www.govinfo.gov/content/pkg/FR-2019-11-12/pdf/2019-23724.pdf)).

<sup>5</sup> Consumer Reports 2019 nationally representative survey of 1,006 U.S. adults, presented at 2020 ICPHSO Annual Meeting and Training Symposium (Feb. 20, 2020).



May 7, 2020

Mr. Tom Gwiazdowski  
Chief Executive Officer  
Artsana USA, Inc. (Chicco USA)  
1826 William Penn Way  
Lancaster, PA 17601

Dear Mr. Gwiazdowski:

Consumer Reports strongly urges Chicco USA to immediately stop producing and recall any infant inclined sleep product, including newborn lounger accessories for the Lullaby Dream, Glow, and Baby Playards. Last November, Consumer Reports President and CEO Marta Tellado sent your company a letter urging quick action in light of evidence showing that inclined sleepers—which now are linked to at least 92 infant deaths—are not safe for infant sleep.<sup>1</sup> It is now more than one year since Fisher-Price and Kids II recalled over 5 million inclined sleepers, and as of today, six other manufacturers also have issued recalls for this type of product. Yet Chicco USA still has not yet joined their ranks and recalled its infant inclined sleep products.

Your company's continued failure to recall its inclined sleepers leaves infants at risk and muddles critical recommendations for consumers around safe infant sleep practices. Infant inclined sleep products are not safe for infant sleep, according to American Academy of Pediatrics recommendations,<sup>2</sup> a government-commissioned study,<sup>3</sup> and the harrowing experiences of families nationwide. We call on Chicco USA to take immediate action to eliminate infant inclined sleep products from the marketplace. This action would be in line with your responsibilities to your customers and consistent with the proposal by the Consumer Product Safety Commission (CPSC) to effectively prohibit these sleepers.<sup>4</sup>

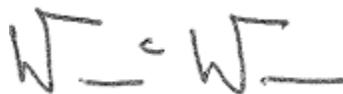
Consumers reasonably expect manufacturers to design and offer products that are safe, and to remove all hazardous products from the market. According to a 2019 Consumer Reports nationally representative survey, more than 90 percent of Americans say that “feeling a product or service is safe and will not cause them or their family members physical harm” is one of their high or top priorities.<sup>5</sup> Putting safety first is critical to securing consumers’ trust and sending the clearest messages to parents and caregivers about safe infant sleep practices. However, over the last year, some companies have attempted to keep infant inclined sleeper models on the market through minor marketing changes. These inclined sleepers remain on the market rebranded as “loungers,” “rockers,” or similar products, but with little or no change to their designs, and with confusing warning labels advising against using the product for “prolonged” or “unattended” sleep. This practice is fundamentally unreasonable and unacceptable because any duration of sleep at an incline puts babies at risk.

We have identified Chicco USA’s newborn lounger accessories for the Lullaby Dream, Glow, and Baby Playards as still available for sale, with branding changes and no meaningful changes to their designs. In CR’s investigation, the only changes we found were made to the marketing and branding to remove some references to sleep and to rename the accessories as “loungers.” However, some materials still call the accessories a “napper” and the angle of the accessories does not seem to have changed. Simply changing a product’s branding—without design changes and stronger warnings not to use the product for infant sleep of any duration—is deeply unfair to parents and caregivers and can all too easily leave them confused and their infants at risk.

Chicco USA must acknowledge the serious risks that inclined sleepers pose to infants, with expert research and numerous tragedies making the danger clear. We strongly urge Chicco USA to take action right away to stop producing and recall any inclined sleeper, and ensure that all future infant sleep products it produces adhere to the strong, mandatory safety standards for bassinets, cribs, or play yards.

Your urgent action is critical to infant safety. We request a response from you no later than Thursday, May 14.

Sincerely,



William Wallace  
Manager, Home and Safety Policy



Oriene Shin  
Policy Counsel

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<sup>1</sup> Consumer Reports, “Letters from CR President and CEO Marta Tellado to infant inclined sleeper manufacturers calling for immediate recalls” (Nov. 4, 2019) (online at: [advocacy.consumerreports.org/research/letters-to-infant-inclined-sleeper-manufacturers-nov-2019](https://www.consumerreports.org/research/letters-to-infant-inclined-sleeper-manufacturers-nov-2019)).

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<sup>3</sup> Mannen EM. Biomechanical Analysis of Inclined Sleep. Tab B of CPSC Staff Supplemental Briefing Package on Infant Sleep Products. 2019 (online at: [www.cpsc.gov/s3fs-public/SupplementalNoticeofProposedRulemakingforInfantSleepProducts\\_10\\_16\\_2019.pdf#page=91](https://www.cpsc.gov/s3fs-public/SupplementalNoticeofProposedRulemakingforInfantSleepProducts_10_16_2019.pdf#page=91)) at PDF p. 91.

<sup>4</sup> CPSC, Safety Standard for Infant Sleep Products, supplemental notice of proposed rulemaking (Nov. 12, 2019) (online at: [www.govinfo.gov/content/pkg/FR-2019-11-12/pdf/2019-23724.pdf](https://www.govinfo.gov/content/pkg/FR-2019-11-12/pdf/2019-23724.pdf)).

<sup>5</sup> Consumer Reports 2019 nationally representative survey of 1,006 U.S. adults, presented at 2020 ICPHSO Annual Meeting and Training Symposium (Feb. 20, 2020).



May 7, 2020

Mr. Paul Powers  
President and Chief Executive Officer  
Dorel Juvenile Group  
25 Forbes Road, Suite 4  
Foxboro, MA 20235

Dear Mr. Powers:

Consumer Reports strongly urges Dorel Juvenile to immediately stop producing and recall any infant inclined sleep product, including the COSCO Calming Motion Infant Bouncer, Tiny Love 3-in-1 Rocker Napper, and Tiny Love Cozy Rocker Napper. Last November, Consumer Reports President and CEO Marta Tellado sent your company a letter urging quick action in light of evidence showing that inclined sleepers—which now are linked to at least 92 infant deaths—are not safe for infant sleep.<sup>1</sup> It is now more than one year since Fisher-Price and Kids II recalled over 5 million inclined sleepers, and as of today, six other manufacturers, including Dorel, also have issued recalls for this type of product. In light of the continued risk to infants, Dorel should take further action and recall all its remaining infant inclined sleepers.

Your company continuing to offer products promoting sleep at an incline leaves infants at risk and muddles critical recommendations for consumers around safe infant sleep practices. Infant inclined sleep products are not safe for infant sleep, according to American Academy of Pediatrics recommendations,<sup>2</sup> a government-commissioned study,<sup>3</sup> and the harrowing experiences of families nationwide. We call on Dorel to take immediate action to eliminate infant inclined sleep products from the marketplace. This action would be in line with your responsibilities to your customers and consistent with the proposal by the Consumer Product Safety Commission (CPSC) to effectively prohibit these sleepers.<sup>4</sup>

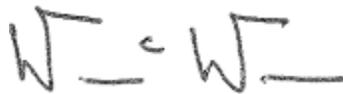
Consumers reasonably expect manufacturers to design and offer products that are safe, and to remove all hazardous products from the market. According to a 2019 Consumer Reports nationally representative survey, more than 90 percent of Americans say that “feeling a product or service is safe and will not cause them or their family members physical harm” is one of their high or top priorities.<sup>5</sup> Putting safety first is critical to securing consumers’ trust and sending the clearest messages to parents and caregivers about safe infant sleep practices. However, over the last year, some companies have attempted to keep infant inclined sleeper models on the market through minor marketing changes. These inclined sleepers remain on the market rebranded as “loungers,” “rockers,” or similar products, but with little or no change to their designs, and with confusing warning labels advising against using the product for “prolonged” or “unattended” sleep. This practice is fundamentally unreasonable and unacceptable because any duration of sleep at an incline puts babies at risk.

We have identified Dorel Juvenile’s COSCO Calming Motion Infant Bouncer, Tiny Love 3-in-1 Rocker Napper, and Tiny Love Cozy Rocker Napper as still available for sale. In CR’s investigation, we found that the COSCO bouncer references “gentle bouncing” and “comfy head support” as product features that help babies take naps in the product. In addition, when reviewing the Tiny Love 3-in-1 Rocker Napper and Cozy Rocker Napper, it is unclear whether the “napper” setting in these products complies with one of the existing strong mandatory safety standards for infant sleep products, namely, the standard for bassinets, cribs, or play yards. If the “napper” setting in these Tiny Love products does not comply with the requirements of one of these standards, we urge you to immediately stop producing and recall these products. Failing to make any needed product design changes to ensure compliance with existing safety standards—and leaving these COSCO and Tiny Love products without stronger warnings against using them for infant sleep of any duration—would be deeply unfair to parents and caregivers and all too easily leave them confused and their infants at risk.

Dorel must acknowledge the serious risks that inclined sleepers pose to infants, with expert research and numerous tragedies making the danger clear. We strongly urge Dorel to take action right away to stop producing and recall any inclined sleeper, and ensure that all future infant sleep products it produces adhere to the strong, mandatory safety standards for bassinets, cribs, or play yards.

Your urgent action is critical to infant safety. We request a response from you no later than Thursday, May 14.

Sincerely,



William Wallace  
Manager, Home and Safety Policy



Oriene Shin  
Policy Counsel

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<sup>1</sup> Consumer Reports, “Letters from CR President and CEO Marta Tellado to infant inclined sleeper manufacturers calling for immediate recalls” (Nov. 4, 2019) (online at: [advocacy.consumerreports.org/research/letters-to-infant-inclined-sleeper-manufacturers-nov-2019](https://www.consumerreports.org/research/letters-to-infant-inclined-sleeper-manufacturers-nov-2019)).

<sup>2</sup> AAP safe sleep recommendations include that babies should be placed alone to bed on a firm, flat surface in their own space, with no extra bedding. AAP, “SIDS and Other Sleep-Related Infant Deaths: Updated 2016 Recommendations for a Safe Infant Sleeping Environment.” (Nov. 2016) (online at: [pediatrics.aappublications.org/content/pediatrics/early/2016/10/20/peds.2016-2938.full.pdf](https://pediatrics.aappublications.org/content/pediatrics/early/2016/10/20/peds.2016-2938.full.pdf)).

<sup>3</sup> Mannen EM. Biomechanical Analysis of Inclined Sleep. Tab B of CPSC Staff Supplemental Briefing Package on Infant Sleep Products. 2019 (online at: [www.cpsc.gov/s3fs-public/SupplementalNoticeofProposedRulemakingforInfantSleepProducts\\_10\\_16\\_2019.pdf#page=91](https://www.cpsc.gov/s3fs-public/SupplementalNoticeofProposedRulemakingforInfantSleepProducts_10_16_2019.pdf#page=91)) at PDF p. 91.

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<sup>5</sup> Consumer Reports 2019 nationally representative survey of 1,006 U.S. adults, presented at 2020 ICPHSO Annual Meeting and Training Symposium (Feb. 20, 2020).



May 7, 2020

Mr. Lorne Jason Clute  
Chief Executive Officer  
Keezio Group (Hiccapop)  
2375 Roundhill Drive  
Alamo, CA 94507

Dear Mr. Clute:

Consumer Reports strongly urges Hiccapop to immediately recall any infant inclined sleep product, including the DayDreamer Baby Floor Seat, which previously has been marketed with different names. Last November, Consumer Reports President and CEO Marta Tellado sent your company a letter urging quick action in light of evidence showing that inclined sleepers—which now are linked to at least 92 infant deaths—are not safe for infant sleep.<sup>1</sup> It is now more than one year since Fisher-Price and Kids II recalled over 5 million inclined sleepers, and as of today, six other manufacturers also have issued recalls for this type of product. Yet Hiccapop still has not yet joined their ranks and recalled its infant inclined sleepers.

Your company's continued failure to recall its inclined sleepers leaves infants at risk and muddles critical recommendations for consumers around safe infant sleep practices. Infant inclined sleep products are not safe for infant sleep, according to American Academy of Pediatrics recommendations,<sup>2</sup> a government-commissioned study,<sup>3</sup> and the harrowing experiences of families nationwide. We call on Hiccapop to take immediate action to eliminate infant inclined sleep products from the marketplace. This action would be in line with your responsibilities to your customers and consistent with the proposal by the Consumer Product Safety Commission (CPSC) to effectively prohibit these sleepers.<sup>4</sup>

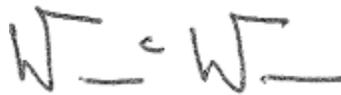
Consumers reasonably expect manufacturers to design and offer products that are safe, and to remove all hazardous products from the market. According to a 2019 Consumer Reports nationally representative survey, more than 90 percent of Americans say that “feeling a product or service is safe and will not cause them or their family members physical harm” is one of their high or top priorities.<sup>5</sup> Putting safety first is critical to securing consumers’ trust and sending the clearest messages to parents and caregivers about safe infant sleep practices. However, over the last year, some companies have attempted to keep infant inclined sleeper models on the market through minor marketing changes. These inclined sleepers remain on the market rebranded as “loungers,” “rockers,” or similar products, but with little or no change to their designs, and with confusing warning labels advising against using the product for “prolonged” or “unattended” sleep. This practice is fundamentally unreasonable and unacceptable because any duration of sleep at an incline puts babies at risk.

We have identified Hiccapop’s DayDreamer Baby Floor Seat as still listed on your website with branding changes and no meaningful changes to its design. In CR’s investigation, the only changes we found were made to the marketing and branding to remove some references to sleep and the terms “sleeper” and “lounger” from the product’s name. Simply changing a product’s branding—without design changes and stronger warnings not to use the product for infant sleep for any duration—is deeply unfair to parents and caregivers and can all too easily leave them confused and their infants at risk.

Hiccapop must acknowledge the serious risks that inclined sleepers pose to infants, with expert research and numerous tragedies making the danger clear. We strongly urge Hiccapop to take action right away to recall its inclined sleepers and ensure that all future infant sleep products it produces adhere to the strong, mandatory safety standards for bassinets, cribs, or play yards.

Your urgent action is critical to infant safety. We request a response from you no later than Thursday, May 14.

Sincerely,



William Wallace  
Manager, Home and Safety Policy



Oriene Shin  
Policy Counsel

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<sup>1</sup> Consumer Reports, “Letters from CR President and CEO Marta Tellado to infant inclined sleeper manufacturers calling for immediate recalls” (Nov. 4, 2019) (online at: [advocacy.consumerreports.org/research/letters-to-infant-inclined-sleeper-manufacturers-nov-2019](https://www.consumerreports.org/research/letters-to-infant-inclined-sleeper-manufacturers-nov-2019)).

<sup>2</sup> AAP safe sleep recommendations include that babies should be placed alone to bed on a firm, flat surface in their own space, with no extra bedding. AAP, “SIDS and Other Sleep-Related Infant Deaths: Updated 2016 Recommendations for a Safe Infant Sleeping Environment.” (Nov. 2016) (online at: [pediatrics.aappublications.org/content/pediatrics/early/2016/10/20/peds.2016-2938.full.pdf](https://pediatrics.aappublications.org/content/pediatrics/early/2016/10/20/peds.2016-2938.full.pdf)).

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<sup>5</sup> Consumer Reports 2019 nationally representative survey of 1,006 U.S. adults, presented at 2020 ICPHSO Annual Meeting and Training Symposium (Feb. 20, 2020).



May 7, 2020

Ms. Joy Nissen  
President  
Nuna Baby Essentials, Inc.  
70 Thousand Oaks Blvd.  
Morgantown, PA 19543

Dear Ms. Nissen:

Consumer Reports strongly urges Nuna to immediately stop producing and recall any infant inclined sleep product, including the Leaf and Leaf Grow, and toppers for the Sena Aire Mini and Cove Aire portable play yards. Last November, Consumer Reports President and CEO Marta Tellado sent your company a letter urging quick action in light of evidence showing that inclined sleepers—which now are linked to at least 92 infant deaths—are not safe for infant sleep.<sup>1</sup> It is now more than one year since Fisher-Price and Kids II recalled over 5 million inclined sleepers, and as of today, six other manufacturers also have issued recalls for this type of product. Yet Nuna still has not yet joined their ranks and recalled its infant inclined sleep products.

Your company's continued failure to recall its inclined sleepers leaves infants at risk and muddles critical recommendations for consumers around safe infant sleep practices. Infant inclined sleep products are not safe for infant sleep, according to American Academy of Pediatrics recommendations,<sup>2</sup> a government-commissioned study,<sup>3</sup> and the harrowing experiences of families nationwide. We call on Nuna to take immediate action to eliminate infant inclined sleep products from the marketplace. This action would be in line with your responsibilities to your customers and consistent with the proposal by the Consumer Product Safety Commission (CPSC) to effectively prohibit these sleepers.<sup>4</sup>

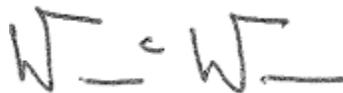
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We have identified the Nuna Leaf and Leaf Grow and toppers for the Sena Aire Mini and Cove Aire portable play yards as still available for sale, with branding changes. In CR’s investigation, the only changes we found were made to the marketing and branding to remove some references to sleep. However, marketing materials for the Leaf Grow bouncer show an infant sleeping in your product, and warnings for the Leaf, Leaf Grow, Cove Aire topper, and Sena Aire Mini topper only warn against “unattended sleep” or “prolonged sleep,” implying that these Nuna products and accessories are safe for certain durations of infant sleep. Simply changing a product’s branding—without design changes and stronger warnings not to use the product for infant sleep for any duration—is deeply unfair to parents and caregivers and can all too easily leave them confused and their infants at risk.

Nuna must acknowledge the serious risks that inclined sleepers pose to infants, with expert research and numerous tragedies making the danger clear. We strongly urge Nuna to take action right away to stop producing and recall any inclined sleeper, and ensure that all future infant sleep products it produces adhere to the strong, mandatory safety standards for bassinets, cribs, or play yards.

Your urgent action is critical to infant safety. We request a response from you no later than Thursday, May 14.

Sincerely,



William Wallace  
Manager, Home and Safety Policy



Oriene Shin  
Policy Counsel

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<sup>5</sup> Consumer Reports 2019 nationally representative survey of 1,006 U.S. adults, presented at 2020 ICPHSO Annual Meeting and Training Symposium (Feb. 20, 2020).



May 7, 2020

Mr. David L. Swift  
Chairman and Chief Executive Officer  
Serta Simmons Bedding  
2451 Industry Avenue  
Doraville, GA 30360

Dear Mr. Swift:

Consumer Reports strongly urges Serta Simmons Bedding to immediately recall its Serta Perfect Sleeper Deluxe Infant Napper. More than one year since Fisher-Price's and Kids II's recalls of over 5 million inclined sleepers, six other manufacturers also have issued recalls for this type of product, which is now linked to at least 92 infant deaths.<sup>1</sup> Serta Simmons Bedding should join their ranks and recall its infant inclined sleepers.

Your company's failure to recall its inclined sleepers would leave infants at risk and muddle critical recommendations for consumers around safe infant sleep practices. Infant inclined sleep products are not safe for infant sleep, according to American Academy of Pediatrics recommendations,<sup>2</sup> a government-commissioned study,<sup>3</sup> and the harrowing experiences of families nationwide. We call on Serta to take immediate action to eliminate infant inclined sleep products from the marketplace. This action would be in line with your responsibilities to your customers and consistent with the proposal by the Consumer Product Safety Commission (CPSC) to effectively prohibit these sleepers.<sup>4</sup>

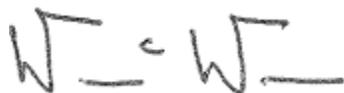
Consumers reasonably expect manufacturers to design and offer products that are safe, and to remove all hazardous products from the market. According to a 2019 Consumer Reports nationally representative survey, more than 90 percent of Americans say that "feeling a product or service is safe and will not cause them or their family members physical harm" is one of their high or top priorities.<sup>5</sup> Putting safety first is critical to securing consumers' trust and sending the clearest messages to parents and caregivers about safe infant sleep practices. However, over the last year, some companies have attempted to keep infant inclined sleeper models on the market through minor marketing changes. These inclined sleepers remain on the market rebranded as "loungers," "rockers," or similar products, but with little or no change to their designs, and with confusing warning labels advising against using the product for "prolonged" or "unattended" sleep. This practice is fundamentally unreasonable and unacceptable because any duration of sleep at an incline puts babies at risk.

We identified Serta's Perfect Sleeper Deluxe Infant Napper being sold secondhand on several online marketplaces. We strongly urge you to take immediate action and recall this product to help ensure this product is removed from households and the market.

Serta Simmons Bedding must acknowledge the serious risks that inclined sleepers pose to infants, with expert research and numerous tragedies making the danger clear. We strongly urge Serta to take action right away to recall its inclined sleepers, and ensure that all future infant sleep products it produces adhere to the strong, mandatory safety standards for bassinets, cribs, or play yards.

Your urgent action is critical to infant safety. We request a response from you no later than Thursday, May 14.

Sincerely,



William Wallace  
Manager, Home and Safety Policy



Oriene Shin  
Policy Counsel

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<sup>1</sup> Consumer Reports, “Letters from CR President and CEO Marta Tellado to infant inclined sleeper manufacturers calling for immediate recalls” (Nov. 4, 2019) (online at: [advocacy.consumerreports.org/research/letters-to-infant-inclined-sleeper-manufacturers-nov-2019](https://www.consumerreports.org/research/letters-to-infant-inclined-sleeper-manufacturers-nov-2019)).

<sup>2</sup> AAP safe sleep recommendations include that babies should be placed alone to bed on a firm, flat surface in their own space, with no extra bedding. AAP, “SIDS and Other Sleep-Related Infant Deaths: Updated 2016 Recommendations for a Safe Infant Sleeping Environment.” (Nov. 2016) (online at: [pediatrics.aappublications.org/content/pediatrics/early/2016/10/20/peds.2016-2938.full.pdf](https://pediatrics.aappublications.org/content/pediatrics/early/2016/10/20/peds.2016-2938.full.pdf)).

<sup>3</sup> Mannen EM. Biomechanical Analysis of Inclined Sleep. Tab B of CPSC Staff Supplemental Briefing Package on Infant Sleep Products. 2019 (online at: [www.cpsc.gov/s3fs-public/SupplementalNoticeofProposedRulemakingforInfantSleepProducts\\_10\\_16\\_2019.pdf#page=91](https://www.cpsc.gov/s3fs-public/SupplementalNoticeofProposedRulemakingforInfantSleepProducts_10_16_2019.pdf#page=91)) at PDF p. 91.

<sup>4</sup> CPSC, Safety Standard for Infant Sleep Products, supplemental notice of proposed rulemaking (Nov. 12, 2019) (online at: [www.govinfo.gov/content/pkg/FR-2019-11-12/pdf/2019-23724.pdf](https://www.govinfo.gov/content/pkg/FR-2019-11-12/pdf/2019-23724.pdf)).

<sup>5</sup> Consumer Reports 2019 nationally representative survey of 1,006 U.S. adults, presented at 2020 ICPHSO Annual Meeting and Training Symposium (Feb. 20, 2020).