



United States
Consumer Product Safety Commission
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June 3, 2022

TRANSMITTED VIA EMAIL

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 (22-06), Item 1

Dear Mr. Rosati:

U.S. Consumer Product Safety Commission (CPSC) staff¹ is casting a negative vote on the ballot on changes related to the warning label content for the ASTM F2057 Clothing Storage Unit (CSU) voluntary standard (F1500000622001).

The CPSC notice of proposed rulemaking (NPR), Safety Standard for Clothing Storage Units (CSUs)² and associated staff briefing package, Draft Notice of Proposed Rulemaking for Clothing Storage Units,³ include detailed discussions of the justifications for including certain warning label requirements in the standard.⁴ Staff is concerned that the ASTM-balloted changes (*e.g.*, label changes related to consumers removing the interlock system), and other misalignments with the NPR warning label requirements do not provide sufficiently effective warnings.

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

¹The 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-](https://cpsc.gov/s3fs-public/Proposed%20Rule-%20Safety%20Standard%20for%20Clothing%20Storage%20Units.pdf?OcybMVfa9ANi6sqiog7qkeNP48c_uz0T)

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⁴ CPSC staff are currently reviewing public comments to the NPR. Draft final rule and final rule language may be different than that in the NPR.

Sincerely,

Kristen Talcott
Project Manager, Clothing Storage Units

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



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West Conshohocken, PA 19428-2959

Re: Negative Vote for ASTM Ballot F15 (22-06), Item 2

Dear Mr. Rosati:

U.S. Consumer Product Safety Commission (CPSC) staff¹ is casting a negative vote on the ballot on changes related to the warning label placement for the ASTM F2057 Clothing Storage Unit (CSU) voluntary standard (F1500000622002).

The CPSC notice of proposed rulemaking (NPR), Safety Standard for Clothing Storage Units (CSUs)² and associated staff briefing package, *Draft Notice of Proposed Rulemaking for Clothing Storage Units*,³ have detailed discussions of the justifications for including certain warning label requirements in the standard.⁴

Staff is concerned that the ASTM-balloted changes (e.g., making warning label placement height non-mandatory; the allowance for warning labels on consumer-assembled units to be placed in non-conspicuous locations, depending on how the consumer assembles the parts; and the option for a shortened warning on the drawer side, with a full warning placed in the bottom of the drawer) do not ensure warning label conspicuity.

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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.

⁴ CPSC staff are currently reviewing public comments to the NPR. Draft final rule and final rule language may be different than that in the NPR.

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

Sincerely,

Kristen Talcott
Project Manager, Clothing Storage Units

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



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Re: Negative Vote for ASTM Ballot F15 (22-06), Item 4

Dear Mr. Rosati:

U.S. Consumer Product Safety Commission (CPSC) staff¹ is casting a negative vote on the ballot on changes related to the warning label placement for the ASTM F2057 Clothing Storage Unit (CSU) voluntary standard (F1500000622004).

The CPSC notice of proposed rulemaking (NPR), Safety Standard for Clothing Storage Units (CSUs)² and associated staff briefing package, *Draft Notice of Proposed Rulemaking for Clothing Storage Units*,³ have detailed discussions of the justifications for elements in the CSU definition and scope.⁴ Staff is concerned that the ASTM balloted changes do not align with several of those elements (e.g., weight and volume limits, calculation of enclosed storage volume), and, therefore, do not address the full range of products that pose a tip-over hazard.

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

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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-](https://cpsc.gov/s3fs-public/Proposed%20Rule-%20Safety%20Standard%20for%20Clothing%20Storage%20Units.pdf?OcybMVfa9ANi6sqiog7qkeNP48c_uz0T)

[%20Safety%20Standard%20for%20Clothing%20Storage%20Units.pdf?OcybMVfa9ANi6sqiog7qkeNP48c_uz0T.](https://cpsc.gov/s3fs-public/Proposed%20Rule-%20Safety%20Standard%20for%20Clothing%20Storage%20Units.pdf?OcybMVfa9ANi6sqiog7qkeNP48c_uz0T)

⁴ CPSC staff are currently reviewing public comments to the NPR. Draft final rule and final rule language may be different than that in the NPR.

Sincerely,

Kristen Talcott
Project Manager, Clothing Storage Units

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



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Re: Negative Vote for ASTM Ballot F15 (22-06), Item 5

Dear Mr. Rosati:

U.S. Consumer Product Safety Commission (CPSC) staff¹ is casting a negative vote on the ballot on changes related to requirements for interlocking elements in the ASTM F2057 Clothing Storage Unit (CSU) voluntary standard (F1500000622005).

The CPSC notice of proposed rulemaking (NPR), Safety Standard for Clothing Storage Units (CSUs)² and associated staff briefing package, Draft Notice of Proposed Rulemaking for Clothing Storage Units,³ include discussion and requirements for interlocked components.⁴ These requirements include that interlocks be pre-installed and automatically engage when drawers are installed, which limits the potential for consumer misassembly and increases the likelihood that these critical safety components are functional when consumers are using the product. Staff is concerned that interlock requirements in the ASTM-balloted language (*e.g.*, allowance for features that enable consumers to use the CSU with the interlock system disabled, and consumer assembly of interlock components for units shipped/sold unassembled) allow consumers to use CSUs in untested, less stable configurations that pose a greater risk of tip over.

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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.

⁴ CPSC staff are currently reviewing public comments to the NPR. Draft final rule and final rule language may be different than that in the NPR.

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

Sincerely,

Kristen Talcott
Project Manager, Clothing Storage Units

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



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Safety Commission**
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**National Product Testing
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5 Research Place
Rockville, MD 20850



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100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

Re: Negative Vote for ASTM Ballot F15 (22-06), Item 6

Dear Mr. Rosati:

U.S. Consumer Product Safety Commission (CPSC) staff¹ is casting a negative vote on the ballot on changes related to requirements for the test weight in the ASTM F2057 Clothing Storage Unit (CSU) voluntary standard (F1500000622006).

The CPSC notice of proposed rulemaking (NPR), Safety Standard for Clothing Storage Units (CSUs)² and associated staff briefing package, *Draft Notice of Proposed Rulemaking for Clothing Storage Units*,³ have detailed discussions of the justifications for CSU stability requirements and test elements.⁴ The ASTM-balloted 60-pound test weight and associated stability test do not account for or simulate the forces from a dynamic child climbing interaction, which is a critical component of adequately addressing the tip-over hazard.

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

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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.

⁴ CPSC staff are currently reviewing public comments to the NPR. Draft final rule and final rule language may be different than that in the NPR.

Sincerely,

Kristen Talcott
Project Manager, Clothing Storage Units

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



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ASTM International
100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

Re: Negative Vote for ASTM Ballot F15 (22-06), Item 7

Dear Mr. Rosati:

U.S. Consumer Product Safety Commission (CPSC) staff¹ is casting a negative vote on the ballot on changes related to requirements for the test weight in the ASTM F2057 Clothing Storage Unit (CSU) voluntary standard (F1500000622007).

The CPSC notice of proposed rulemaking (NPR), Safety Standard for Clothing Storage Units (CSUs)² and associated staff briefing package, *Draft Notice of Proposed Rulemaking for Clothing Storage Units*,³ have detailed discussions of the justifications for CSU stability requirements and test elements.⁴ The ASTM-balloted 60-pound test weight and associated stability test do not account for or simulate the forces from a dynamic child climbing interaction, which is a critical component of adequately addressing the tip-over hazard.

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

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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.

⁴ CPSC staff are currently reviewing public comments to the NPR. Draft final rule and final rule language may be different than that in the NPR.

Sincerely,

Kristen Talcott
Project Manager, Clothing Storage Units

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



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100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

Re: Negative Vote for ASTM Ballot F15 (22-06), Item 8

Dear Mr. Rosati:

U.S. Consumer Product Safety Commission (CPSC) staff¹ is casting a negative vote on the ballot on changes related to the testing requirements for the ASTM F2057 Clothing Storage Unit (CSU) voluntary standard (F1500000622008).

The CPSC notice of proposed rulemaking (NPR), Safety Standard for Clothing Storage Units (CSUs)² and associated staff briefing package, *Draft Notice of Proposed Rulemaking for Clothing Storage Units*,³ have detailed discussions of the justifications for elements in the CSU definition and scope.⁴ Staff has several concerns with the ASTM-balloted tests, including:

1. Tests do not simulate multiple simultaneous factors that are demonstrated to decrease stability and to simultaneously exist during known incidents—*i.e.*, multiple open/filled drawers, carpet, and forces from children's dynamic interactions.
2. The test in Section 9.2.3, *Simulating a Reaction on Carpet with Child Weight*, uses a 60-pound test weight placed on the edge of an open drawer. The balloted language implies that the 60-pound test

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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-](https://cpsc.gov/s3fs-public/Proposed%20Rule-%20Safety%20Standard%20for%20Clothing%20Storage%20Units.pdf?OcybMVfa9ANi6sqiog7qkeNP48c_uz0T)

[%20Safety%20Standard%20for%20Clothing%20Storage%20Units.pdf?OcybMVfa9ANi6sqiog7qkeNP48c_uz0T.](https://cpsc.gov/s3fs-public/Proposed%20Rule-%20Safety%20Standard%20for%20Clothing%20Storage%20Units.pdf?OcybMVfa9ANi6sqiog7qkeNP48c_uz0T)

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weight represents the body weight of a child, and that the test simulates a child's interaction force. However, the Child Climbing Study (Tab R) and analysis in the CPSC staff briefing package demonstrates that the Center of Mass of a child climbing would be outboard of the drawers. Static body weight in line with the edge of the drawer (as proposed Section 9.2.3) substantially underestimates the forces generated during child climbing interactions. Incident data shows climbing interactions to be among the most common interactions during incidents.

3. The pull force in the test in Section 9.2.2 is lower than demonstrated child strength, and does not appear to be a simulated dynamic force, as claimed.

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

Sincerely,

Kristen Talcott
Project Manager, Clothing Storage Units

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