



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
5 Research Place, Rockville, MD 20850

January 11, 2021

TRANSMITTED VIA EMAIL

Richard Rosati  
Subcommittee Chairman for ASTM Infant Inclined  
Sleep Products  
ASTM International  
100 Barr Harbor Dr.  
West Conshohocken, PA 19428-2959

Re: ASTM F15.18 Infant Inclined Sleep Products: Ballot F15-18 (20-01), Item #1

Dear Mr. Rosati:

I am writing to commend and support the Infant Inclined Sleep Products Subcommittee on Ballot F15-18 (20-01), Item #1.<sup>1</sup>

As presented in the CPSC Supplemental Notice of Proposed Rulemaking (SNPR) for infant sleep products, the CPSC is pursuing rulemaking to ensure that infant sleep surfaces are flat and meet at least the federal regulation for bassinets/cribbs, if the infant sleep product does not already meet the federal regulation for full-size cribs, non-full-size cribs, play yards, or bedside sleepers.<sup>2</sup> Accordingly, CPSC staff supports the ballot item proposing to remove the word “inclined” from the title, introduction, and scope, because it aligns with the SNPR.

The balloted scope language states, “All infant sleep products *shall meet this standard or meet* one of the current sleep product standards which include Cribs (F1169), Bassinets (F2194), Bedside Sleepers (F2906), and Non Full-Size Cribs/Play Yards (F406). A mattress that is covered by F2933 is out of scope for this standard.” (Emphasis added). Staff abstains from voting on this language because the final requirements of “this standard” are under revision and currently unknown. However, CPSC staff encourages the subcommittee to consider the language proposed in the SNPR as you continue your work to update the standard.

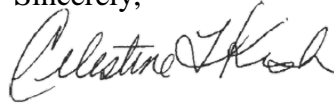
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<sup>1</sup> The views or opinions expressed in this letter are solely those of the staff, and these views and opinions do not necessarily represent those of the Commission.

<sup>2</sup> [https://cpsc.gov/s3fs-public/SupplementalNoticeofProposedRulemakingforInfantSleepProducts\\_10\\_16\\_2019.pdf?TPVAJZEQcz9x9sKeEGltm4LskkonxUWv](https://cpsc.gov/s3fs-public/SupplementalNoticeofProposedRulemakingforInfantSleepProducts_10_16_2019.pdf?TPVAJZEQcz9x9sKeEGltm4LskkonxUWv)

Thank you for your consideration of these issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Celestine T. Kish". The signature is fluid and cursive, with the first name "Celestine" being more prominent and the last name "Kish" following in a similar style.

Celestine T. Kish

Project Manager Infant Sleep Products

cc: Molly Lynyak, Manager, Technical Committee Operations  
Patricia Edwards, CPSC Voluntary Standards Coordinator  
Hope Nesteruk, Children's Program Area Manager