



United States
Consumer Product Safety Commission

April 5, 2022

Mr. Marco Fossi, Chairperson
Mr. Fabrizio Tacca, Committee Manager
ISO Technical Committee 136
Via Sannio, 2
I-20137 Milano, Italy

Subject: Proposal for Changes to ISO 10131 *Foldaway beds - Safety requirements and tests*

Dear Mr. Fossi and Mr. Tacca:

While investigating foldaway beds in the U.S. marketplace, U.S. Consumer Product Safety Commission (CPSC) staff¹ found instances of insufficient mounting instructions, as well as instances in which necessary hardware was not included with the product. These situations have led to consumers' deaths and injuries due to improper installation. Therefore, CPSC staff requests the ISO Technical Committee review the installation requirements in ISO 10131-1 and consider the following:

- 1) CPSC staff suggests that the bed mounting installation instructions in Section 5 require that the product documentation include:
 - a. Detailed mounting instructions for that model foldaway bed, which state the specific type(s) of wall structures (e.g., such as wood studs, metal studs, cement blocks) to which the product is intended to be mounted. The instructions should include appropriate illustrations to depict proper installation considerations.
 - b. A specific list of the hardware supplied with the model, or the hardware needed, to properly anchor the foldaway bed structure into the applicable wall system(s).
- 2) CPSC staff suggests defining a "competent person" used in Section 6, as a professional installer who has been "certified" by an appropriate governmental or private body, or is "authorized by" or "received training" from the manufacturer, retailer, or other third party.

I am available to answer any questions that the technical committee has on these identified issues. I look forward to helping you improve the safety of these products.

Sincerely,

Duncan Scott Snyder

Duncan Scott Snyder
Mechanical Engineer
dsnyder@cpsc.gov

CC: Jacqueline Campbell, Voluntary Standards Coordinator
David Panning, U.S. TAG Chair & Administrator for ISO TC 136 Furniture

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