



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

April 26, 2018

TRANSMITTED VIA EMAIL

Mr. Don Huber  
ASTM  
100 Barr Harbor Dr.  
West Conshohocken, PA 19428-2959

Re: Request for the Subcommittee on Stationary Activity Centers to Address Strap Failure Mode Due To Fraying

Dear Mr. Huber:

CPSC staff has recently learned of a new failure mode associated with stationary activity centers in which frictional wear on the suspension straps may cause the straps to fray and break.<sup>1</sup> CPSC staff requests that the ASTM subcommittee modify the performance requirements for structural integrity to address this issue. CPSC staff suggests the following modifications to the standard (in red and underlined):

6.1 *Structural Integrity*—All tests that cover static and dynamic loading, and occupant retention, are to be performed on the same product, sequentially and without refurbishing or repositioning of adjustment, if any. At test conclusion, there shall be no fraying, tearing, or failure of textile materials, such as seams or straps; breakage of materials; or changes of adjustments that could cause the product to not fully support the child or create a hazardous condition as defined in Section 5. Maximum slippage of adjustable features, if any, is 1 in. (25 mm).

In addition, staff requests that the ASTM subcommittee investigate potential modifications of the test method in section 7 of the standard to further address this failure mode.

The three photographs below show incident stationary activity centers with a seam failure, fraying, and tearing of the strap. These issues can lead to failure of the suspension straps, resulting in a child falling out of the stationary activity center.

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<sup>1</sup> These comments are those of CPSC staff, and they have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

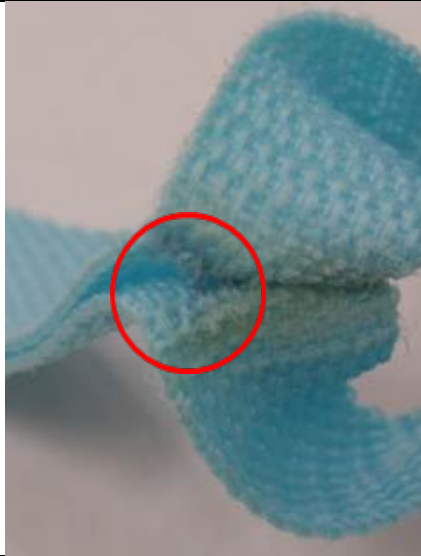


Figure 1. Failure of a seam

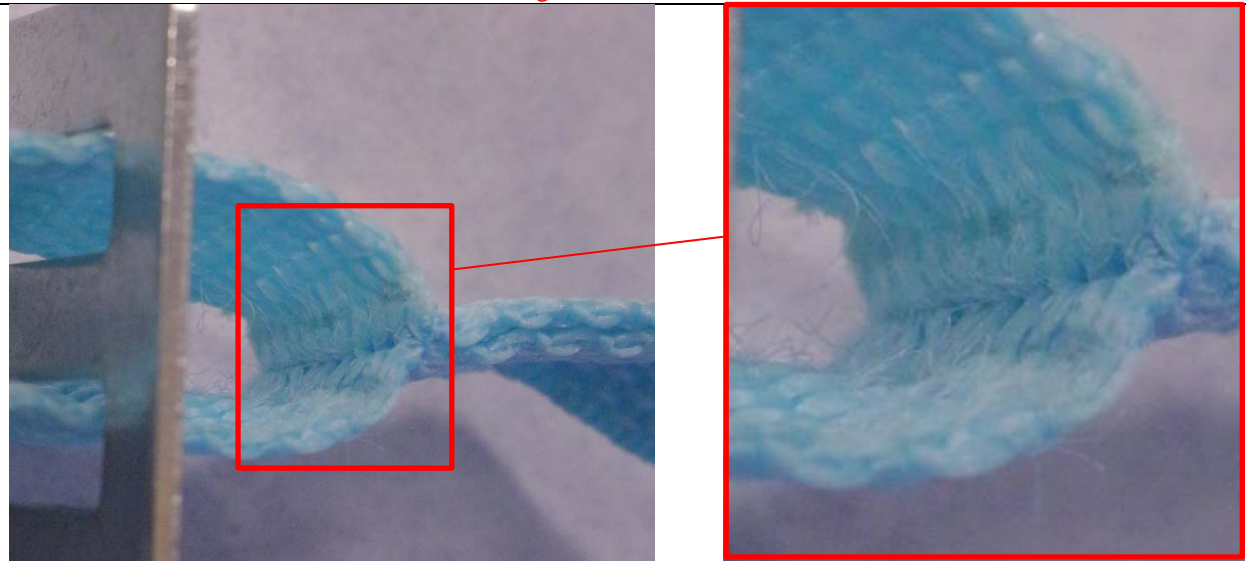
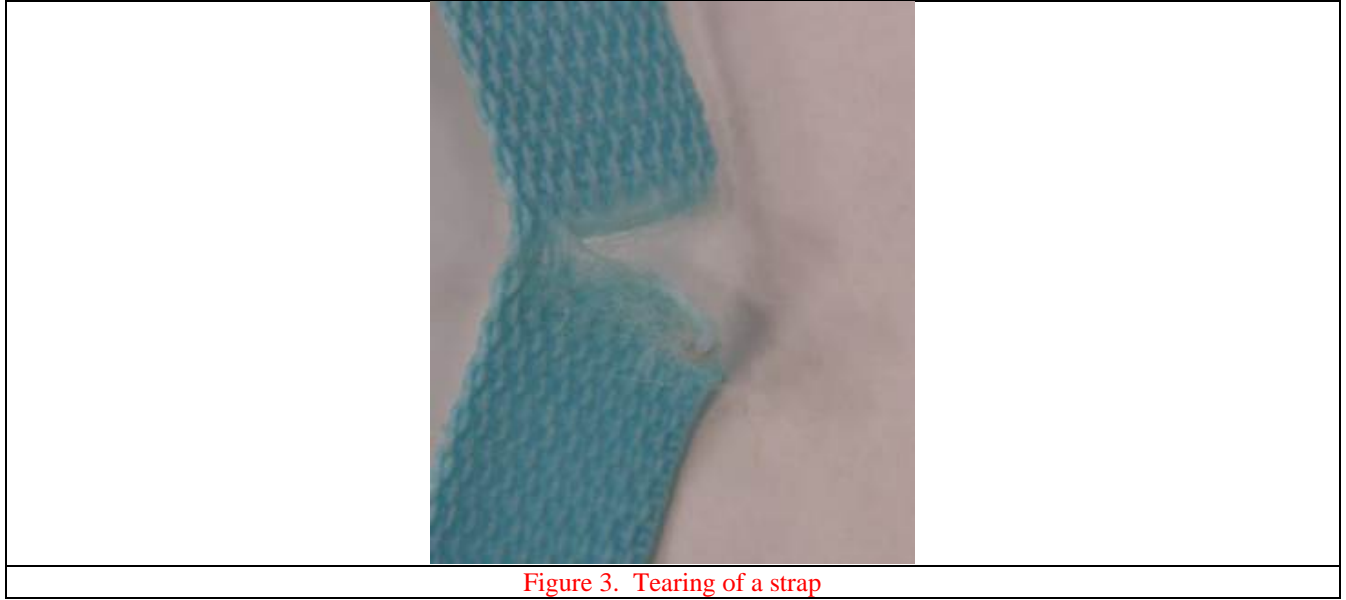


Figure 2. Fraying between two straps



If you have any questions or comments, please feel free to contact me at: [klee@cpsc.gov](mailto:klee@cpsc.gov) or (301) 987-2486.

Sincerely,



Kevin Lee  
Mechanical Engineer  
Division of Mechanical Engineering and Combustion

Cc: Len Morrissey, ASTM Staff Manager for F15  
Patricia Edwards, CPSC Voluntary Standards Coordinator