



October 8, 2021

TRANSMITTED VIA EMAIL

Brian Grochal  
Subcommittee Chairman for ASTM In-Bed Sleepers  
ASTM International  
100 Barr Harbor Dr.  
West Conshohocken, PA 19428-2959

Re: Negative Vote for ASTM Ballot F15.18 (21-01)

Dear Mr. Grochal:

U.S. Consumer Product Safety Commission (CPSC) staff<sup>1</sup> appreciates the work that you and the various task groups have diligently completed in your effort to establish a voluntary standard for in-bed sleepers. However, as you are aware, the proposed ASTM standard, as currently balloted, does not correspond to the new federal regulation for Infant Sleep Products. Although this standard proposes that all products must comply with the ASTM F2194 bassinet standard, there is an exception for “. . . Side Height, Stability, Marking and Labeling, and Instructional Literature requirements.” Accordingly, I am casting a negative vote for Ballot F15.18 (21-01). Staff continues to express concern with the use of portable, compact sleep products that do not provide infants with a firm, flat, sleep space in which consumers can confidently leave their infant to sleep unsupervised. Though, in-bed sleepers are intended to be used with adult supervision, adults cannot provide appropriate supervision when they are also sleeping.

Staff looks forward to working with you to ensure that the new In-bed Sleepers standard is as strong as, or stronger than, the performance requirements in the existing bassinet/cradle standard, to provide for a safe infant sleep environment.

Sincerely,

Celestine T. Kish,  
Project Manager, Infant Sleep Products

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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.

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