



April 10, 2024

Julia Costello
ASTM F15.55 Subcommittee Chair
Vista Outdoor Inc.
9200 Cody St.
Overland Park, KS 66214

Dear Ms. Costello:

U.S. Consumer Product Safety Commission (CPSC) staff¹ appreciates the continuing efforts of the ASTM F15.55 subcommittee to improve the biometric locking feature requirements in ASTM F2456, *Standard Safety Specification for Youth-Resistant Firearms Containers (YRFCs)*, and urges ASTM to adopt similar improvements for related products. In the most recent version of the standard, Section 5.5 requires that biometric recognition lock features shall not open the container via the biometric interface until an authorized user programs a unique biometric method into the product. As evidenced by multiple incidents and recalls,² these requirements are critical to the safety performance of these products by preventing a state in which the container can be unlocked by input into the biometric locking feature that was not programmed, paired, and/or intended by the authorized user. During the last subcommittee meeting held on January 30, 2024, subcommittee members expressed concern regarding the lack of these biometric locking feature requirements for similar containers that are outside of the scope of ASTM F2456. CPSC staff shares these concerns and urges the subcommittee to promptly address this serious vulnerability through further development of voluntary standards.

The current scope of ASTM F2456 excludes transport-type firearm carrying cases, full-sized light gun cabinets, gun safes, high security gun safes, and containers for firearms that exceed a length of 20 inches. These products, however, may use biometric locking features that present the same unintended access hazard addressed by section 5.5 of ASTM F2456. CPSC staff assesses that any locking device or container that can be reasonably expected to store a firearm and uses a biometric locking feature should meet the requirement in section 5.5 and any other related improvements to the standard. The requirements in ASTM F2456 pertaining to biometric interfaces are intended to

¹ This letter was prepared by CPSC staff. It has not been reviewed or approved by, and may not represent the views of, the Commission.

² [Fortress Safe Announces Recall of Biometric Gun Safes Due to Serious Injury Hazard and Risk of Death; One Death Reported | CPSC.gov](#)



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prevent unauthorized access by children under the age of 12 and are just as critical for the abovementioned products that are currently excluded.

CPSC looks forward to working with the ASTM F15.55 subcommittee to address this issue.

Sincerely,

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CC: Jacqueline Campbell, CPSC Voluntary Standards Coordinator
Molly Lynyak, ASTM F15 Staff Manager
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