



March 13, 2023

TRANSMITTED VIA EMAIL

Ms. Jennifer King
Chair, ASTM F15.18 Subcommittee on Play Yards and Non-Full-Size Cribs
ASTM International
100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959
Jennifer.King@newellco.com

Dear Ms. King:

On February 15, 2022, the U.S Consumer Product Safety Commission promulgated the final rule for crib mattresses, which is codified in 16 CFR part 1241, *Safety Standard for Crib Mattresses*, effective August 15, 2022.¹ This final rule addresses hazards associated with after-market play yard mattresses by incorporating by reference the voluntary standard for crib mattresses, ASTM F2933 – 21, which includes requirements for after-market play yard mattresses. Through the incorporation of ASTM F2933-21, the crib mattress rule further requires that all after-market play yard mattresses meet the same requirements as original equipment manufacturer (OEM) play yard mattresses in ASTM F406 *Standard Consumer Safety Specification for Non-Full-Size Baby Cribs/Play* and adds a test for mattress firmness which is intended to address suffocation from overly soft and thick after-market mattresses.

The firmness test in the mandatory crib mattress is intended to prevent the hazard of infants suffocating when face down in a soft mattress that can conform to an infant's face. While this firmness test applies to after-market play yard mattresses pursuant to the crib mattress rule, OEM mattresses that come included with play yards subject to the play yard rule are not required to test for mattress firmness, because it is not required in ASTM F406. CPSC staff recommends that the ASTM F15.18 Subcommittee on Play Yards and Non-Full-Size Cribs add mattress firmness requirements to ASTM F406 for OEM play yard mattresses to address the same infant suffocation hazard related to soft mattresses and to align with current requirements for after-market play yard mattresses in the recently established *Safety Standard for Crib Mattresses*.

CPSC staff looks forward to working with ASTM to develop these requirements. If you have any questions or concerns, please feel free to contact me.

¹ The views or opinions expressed in this letter are solely those of the staff, and have not been reviewed or approved by, and do not necessarily represent the views of, the Commission.

Sincerely,

A handwritten signature in black ink, appearing to read "Fred de Grano", followed by a horizontal line.

Frederick J. de Grano
Play Yard Project Manager
Division of Mechanical and Combustion Engineering
Directorate for Engineering Sciences

cc: Jacqueline Campbell – CPSC Voluntary Standards Coordinator
Daniel Taxier – CPSC Children’s Program Manager
Molly Lynyak – Staff Manager, ASTM Committee F15 on Consumer