



March 10, 2022

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 (22-02)

Dear Mr. Grochal:

U.S. Consumer Product Safety Commission (CPSC) staff¹ appreciates how quickly the task group is working to address issues raised in previous ballots for the development of a voluntary standard for in-bed sleepers. However, I am casting a negative vote on this ballot because, as indicated in my previous negative vote, the proposed standard is not consistent with the new federal regulation for infant sleep products.

The previous ballot had a proposed performance test that did not fully address all the known hazards but was an attempt to test for containment and fall hazards with an angle test. However, this new ballot has completely removed all performance tests related to containment. In addition, the proposed side height of 4 inches from the mattress weakens steps to address the containment hazard from the higher side height requirement of 7.5 inches in the bassinet standard. As discussed in the infant sleep product regulation, injuries and deaths due to in-bed sleepers failing to contain the infant have been identified. CPSC staff recommends adopting the bassinet side height, rather than the task group's less stringent height requirement merely because that is consistent with some products on the market. Staff continues to express concern with the use of portable, compact sleep products that do not provide infants with a firm, flat, sleep space where consumers can safely leave their infant to sleep unsupervised. Although 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.

¹ 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.

Sincerely,



Celestine T. Kish,
Project Manager, Infant Sleep Products

cc: Molly Lynyak, Manager, Technical Committee Operations
Jacqueline Campbell, CPSC Voluntary Standards Coordinator



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