



April 27, 2022

TRANSMITTED VIA EMAIL

Scott Lewis
Subcommittee Chairman for ASTM Bassinets
ASTM International
100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

Re: Negative Vote for ASTM Ballot F15 (22-04)

Dear Mr. Lewis:

U.S. Consumer Product Safety Commission (CPSC) staff¹ appreciates the task group's efforts to address the issue of the undefined terms "legs," "base," and "stand" within the definition of a "bassinet/cradle." However, I am casting a negative vote on this ballot because the proposed definition of "bassinet/cradle" that removes any reference to legs, base, or stand from the definition conflicts with the requirements of the new federal regulation, Safety Standard for Infant Sleep Products (ISP), 16 C.F.R. part 1236, effective June 23, 2022 (the ISP rule).

As noted in the ISP rule²:

[u]nregulated flat sleep products are not required to have a stand. Therefore, these products can be placed directly on the floor or on potentially hazardous or unstable elevated surfaces, such as tables, countertops, soft mattresses, or couches. The ASTM F2194-16e1 bassinets standard addresses this hazard scenario by requiring bassinets to have a stand/base/frame. ASTM F2194-16e1 defines a "bassinet" as a small bed "supported by free standing legs, a stationary frame/stand, a wheeled base, a rocking base, or which can swing relative to a stationary base.

This requirement for bassinets/cradles to have a stand, and be raised off the floor, discourages or prevents use of the product on other, less stable, surfaces, such as elevated surfaces or soft surfaces (couches and adult beds). Therefore, with respect to this hazard scenario, the ISP rule requires that all infant sleep products, flat and inclined, meet 16 C.F.R. 1218 bassinet regulation, including

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.

² <https://www.federalregister.gov/documents/2021/06/23/2021-12723/safety-standard-for-infant-sleep-products>

requiring products to have a stand. This requirement in the ISP Rule is codified by requiring products to meet the definitional requirement of a “bassinet/cradle.”

CPSC staff recommends that instead of removing stand/base/frame reference from the definition of bassinet, ASTM subcommittee members should define the term and establish performance requirements to discourage or prevent use of the product on other, less stable surfaces, such as elevated surfaces or soft surfaces (couches and adult beds).

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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