



October 14, 2021

Ms. Joan Lawrence  
ASTM Subcommittee Chair for F15.22, Toy Safety  
ASTM International  
100 Barr Harbor Drive  
West Conshohocken, PA 19428

Dear Ms. Lawrence:

I am writing to convey U.S. Consumer Product Safety Commission (CPSC) staff's support for Ballot F15 (21-7) Item 9, which contains revisions to the ASTM F963 – 17, *Standard Consumer Safety Specification for Toy Safety*, acoustics sections<sup>1</sup>.

This ballot is a continuation of ASTM's extensive work on the acoustics section that followed a CPSC letter of exemption concerning testing of push or pull toys in F963 – 17. The balloted language, which was developed and refined in a working group with CPSC staff's participation, provides a revised A-weighted maximum sound pressure limit<sup>2</sup> for push or pull toys based on expected use distance, a reordering and rewording of the acoustics requirements and test methods to clarify the applicable sound requirements for all sound-producing toys, and revised definitions that clarify categories of toys. Portions of these changes were previously balloted in F15 (18-11) Item 3 and F15 (20-12) Item 2; F15 (21-7) Item 9 incorporates editorial and technical changes arising from the previous ballots.

Staff believes that the changes proposed in this ballot will improve consistency of testing, and we are hopeful that this language will be incorporated into the next revision of the standard.

Thank you for your continued work to revise and improve toy safety through ASTM F963.

Sincerely,

*Benjamin Mordecai*

Ben Mordecai  
Mechanical Engineer  
Directorate of Laboratory Sciences

CC:

Molly Lynyak, ASTM (MLynyak@astm.org)  
Jacqueline Campbell, CPSC Voluntary Standards Coordinator (VoluntaryStandards@cpsc.gov)

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<sup>1</sup> The views in this letter are those of the staff and have not been reviewed or approved by, and may not reflect the views of, the Commission.

<sup>2</sup> The A-weighted limits in the acoustics section address hazards associated with exposure to continuous sounds; whereas the C-weighted limits address hazards associated with impulse sounds.