April 27, 2022

Ms. Jennifer King [Transmitted via email]
Chair, ASTM F15.18 Subcommittee on Play Yards and Non-Full-Size Cribs
ASTM International
100 Barr Harbor Drive
West Conshohocken, PA 19428

Dear Ms. King:

This letter is the U.S. Consumer Product Safety Commission (CPSC) staff's[1] response to ballot F15 (22-04), Item 6.  Item 6 proposes a number of changes to the marking and labeling requirements specified in ASTM F406 – 19, *Standard Consumer Safety Specification for Non-Full-Size Baby Cribs/Play Yards*.

Staff abstains from voting on this ballot item; however, staff recommends the following changes:

- Global – Notes and figures should be numbered correctly in the final version (*e.g.*, "NOTE XX" in Line 20).
- Global – Update with consistent formatting (*e.g.,* the font for the words "secure" and "loose" in Line 27 and FIG. X1).
- Global – Correct meaningful editorial errors in the final version (*e.g.,* missing bracket in Line 40).
- Line 39 – Replace "specifically identifies" with "is marked with" to clarify reference to product marking/labeling.
- FIG. X1 – Update to align with Section 9 (*e.g.,* the first bullet is missing the underlined text in the following statement: "Prior to use, the product must be fully erected, including side rails").
- FIG. X1 – Remove the underline from the period following "loose."
- FIG. X2 – Resize example warning to reduce empty space.
- Line 48 and FIG. X2 – Update the use of bulleting consistent with Ad Hoc.

Staff appreciates the subcommittee's progress and looks forward to continuing efforts to address the safety of Play Yards and Non-Full-Size Cribs.

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[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
*Sr. Engineering Psychologist*
*Directorate for Engineering Sciences*

Frederick DeGrano
*Mechanical Engineer*
*Directorate for Engineering Sciences*

cc:    Jacqueline Campbell – CPSC Voluntary Standards Coordinator
       Molly Lynyak – Staff Manager, ASTM Committee F15 on Consumer Products

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