



January 12, 2022

TRANSMITTED VIA EMAIL

Richard Rosati
Subcommittee Chairman for ASTM Infant Inclined Sleep
Products
ASTM International
100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

Re: ASTM F15.18 Infant Inclined Sleep Products: Ballot F15 (21-10), Item #3

Dear Mr. Rosati:

I vote negative on the Infant Inclined Sleep Products Ballot F15 (21-10), Item #3.¹

On June 23, 2021, the U.S. Consumer Product Safety Commission (CPSC) issued a final rule establishing a Safety Standard for Infant Sleep Products (ISP final rule). The goal of the ISP final rule is to ensure that any product intended as a sleeping accommodation for infants up to 5 months old provides a safe sleep environment. A safe sleep environment means that infant sleep surfaces are flat, firm, and meet at least the federal regulation for bassinets/cribles, if the infant sleep product does not already meet the federal regulation for full size cribs, non-full-size cribs, play yards, or bedside sleepers.²

CPSC staff supports the ballot item proposing to remove the word “inclined” from throughout the standard, and to expand the scope to cover products “not included in the scope of another ASTM sleep standard.” However, staff does not support changes to the voluntary standard that are inconsistent with the ISP final rule, meaning changes that diverge from the minimum safe sleep requirements in the mandatory regulation for bassinets/cribles.

Additionally, as noted in the rationale for this ballot, the side height and structural integrity requirements are still to be determined. CPSC staff contends that these are critical requirements that should be included now and should meet the bassinet requirements. Because the substantive provisions in the ballot are either incomplete or inconsistent with the Commission’s ISP final rule, CPSC staff votes negative on this ballot.

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>



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Sincerely,

A handwritten signature in black ink that reads "Celestine T. Kish". The signature is written in a cursive style and is positioned above a light gray rectangular background.

Celestine T. Kish
Project Manager Infant Sleep Products
Division of Human Factors

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

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Safety Commission**
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