



March 29, 2024

TRANSMITTED VIA EMAIL

Ms. Jennifer King (Jennifer.King@newellco.com)
Chair, ASTM F15.18 Subcommittee on Play Yards and Non-Full-Size Cribs
ASTM International
100 Bar Harbor Drive
West Conshohocken, PA 19428

RE: ASTM Ballot F15 (24-05), Item 3

Dear Ms. King,

This letter is the U.S. Consumer Product Safety Commission (CPSC) staff's¹ response to ASTM ballot F15 (24-05), Item 3, pertaining to revisions of ASTM F406 – 22, *Standard Consumer Safety Specification for Non-Full-Size Baby Cribs/Play Yards*. Item 3 proposes updates to definitions and warning label requirements pertaining to the strangulation hazard associated with accessories for non-full-size cribs and play yards.

Staff votes negative on this ballot for the following reasons:

1. Line 5, Section 3.1.24.2 and Figure A1.X3: The type of accessory described and exemplified in this discussion section and figure, respectively, is not consistent with the definition for “full accessory” (Section 3.1.24), which states that full accessories fully cover the top opening of the play yard or non-full-size crib without any gaps or openings that would expose an occupant to an entrapment hazard. The example provided in Figure A1.X3 and its associated entrapment hazard are more similar to a play yard/non-full-size crib “dependent accessory” as defined in Section 3.1.23 and the associated entrapment hazard that the requirements in Section 5.15 are intended to address.
2. Line 6, Section 5.15: The requirements in this section only apply to “play yard/non-full-size crib dependent accessories” (Section 3.1.23). However, the accessories described in Section 3.1.24.2, which are not subject to Section 5.15, do not cover the full opening of the play yard/non-full-size crib and therefore expose an occupant to the entrapment hazard the requirements in Section 5.15 are intended to address. Staff recommends moving Section 3.1.24.2 to a discussion sub-section under 3.1.23 *play yard/non-full size crib dependent accessory*; this will address both comments 1 and 2.

¹ This letter was prepared by the CPSC staff. It has not been reviewed or approved by, and may not represent the views of, the Commission.

Staff also has the following editorial comment:

1. Recommend moving "... and that, because of its structure, location, or movement, exposes the occupant to gaps or openings that may create an entrapment hazard" (Section 3.1.23) to a discussion subsection. This sentence does not seem like a defining trait for this type of accessory, and it does not seem appropriate to describe a hazard as part of a definition for an accessory.

CPSC staff appreciates the subcommittee's efforts to establish performance requirements to make non-full-size cribs and play yards safer for children. As always, we are happy to discuss our comments at the next Task Group or Subcommittee Meeting.

Sincerely,



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
Don Mays, Chair, ASTM Committee F15 on Consumer Products
Daniel Taxier, CPSC Children's Program Manager