



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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TRANSMITTED VIA EMAIL

October 14, 2020

Don Huber
ASTM Subcommittee Chair for ASTM Stationary Activity Centers
100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

Re: ASTM F15.17 Stationary Activity Centers

Dear Mr. Huber:

The U.S. Consumer Product Safety Commission (CPSC) published a final rule for stationary activity centers (SACs) on June 18, 2019.¹ In this final rule, staff identified an issue with strap failure, caused when metal components on SACs come in contact with the straps. The Commission did not adopt an additional requirement to address this hazard because: “(1) The ASTM task group has made progress toward developing a requirement to address fraying straps; (2) CPSC is aware of only one product that involved this issue; and (3) the one product has been redesigned with parts that will not cause the strap to fray.”

On October 21, 2019, the ASTM SAC Strap Integrity Task Group stated that they planned to ballot new requirements. Ten months later, the SAC Strap Integrity Task Group met via teleconference on August 31, 2020 to review a proposal to address SACs with frayed or broken suspension straps. This proposal provides that SACs with seats supported by a suspension system from above shall have one of the following:

1. Have a new redundant strap that shares no attachment points with the primary suspension system. When the primary suspension system is disabled, the new redundant strap shall prevent the seat from tilting more than 25 degrees.
2. Have a 25-pound weight dropped on their seat for 120,000 cycles with no product failure.

At the conclusion of the August 31, 2020 meeting, task group members agreed that the task group would continue working on this proposal via email, by adding a rationale for the proposed 120,000 cycles. The task group planned to send the proposal for ballot after the next subcommittee meeting on November 9, 2020. However, staff notes that the SAC subcommittee

¹ These comments are those of CPSC staff, and have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

is not on ASTM's F15 Consumer Products Line Schedule for November 2020.² In addition, staff has not heard via email from the SAC Strap Integrity Task Group since the August 31, 2020 meeting.

Because 11 months have passed since the decision to develop requirements for SAC strap failures, staff urges ASTM to schedule a virtual task group meeting within the next 2 weeks, and to schedule a subcommittee meeting in November 2020. CPSC staff encourages the subcommittee to ballot new requirements for SAC strap integrity immediately after the subcommittee meeting.

If you have any questions, please feel free to contact me. Thank you for your attention to this important safety issue.

Sincerely,

Kevin Lee

CC: Patricia L. Edwards, CPSC Voluntary Standards Coordinator
Meredith Birkhead, Juvenile Products Manufacturers Association (JPMA)
Molly Lynyak, ASTM International

² https://myastm.astm.org/MEETINGS/filtrexx40.cgi?+-P+MAINCOMM+F15+-P+EVENT_ID+4146+-P+MEETING_ID+147703+lineschedule.frm