

June 9, 2026

TRANSMITTED VIA BALLOT COMMENT

Bill Purdue
ASTM F15.42 Recliner Scope Task Group Chair
ASTM International
100 Barr Harbor Drive
West Conshohocken, PA 19428

Dear Mr. Purdue:

U.S. Consumer Product Safety Commission (CPSC) staff¹ appreciates the opportunity to provide comments on work item WK87355 – New Standard Specification for Residential Seating Designed to Recline with a Foot Support Lift Mechanism. Staff supports the work of the task group to better understand the hazards associated with motion furniture for improving safety. We offer two comments on the proposed scope as detailed below:

Comment 1 (preamble and Note 1)

Staff recommends the following change to the age range specified in Note 1 of the ballot item:

“the affected age group is defined by the incident data provided to the ASTM F15.42 Furniture Safety Subcommittee by CPSC for the period 01/01/2011 to 12/31/2021 including 8 fatalities, which involve children between 8 months and 5 years ~~60 months~~.”

Rationale:

Staff recommends stating the upper age limit as “5 years” rather than 60 months because the incidents provided by CPSC staff include children older than 60 months, such as a 5-year-and-3-month (63-month) old child. The specified age range for victims in the incident data in CPSC staff’s April 27, 2023 letter² was “ages 8 months to 5 years.” Staff did not limit the data to

¹ The views expressed in this letter are those of CPSC staff, and they have not been reviewed or approved by, and may not necessarily reflect the views, of the Commission.

² <https://cpsc.gov/s3fs-public/CPSC-Staff-Letter-to-ASTM-15-42-Furniture-Safety-on-Recliner-Entrapment.pdf>

children younger than 5 years (60 months old). A “five-year-old child” is one that has turned 5 years old (60 months) but has not yet turned 6 years old (72 months). Children that were 5-years old were included in the data set, including a death of a child that was several months past their 5th birthday, but not yet 6 years old (incident #6 in the letter/IDI 130905CCC2971). Upon reviewing the source documents, this incident occurred about 3 months past the victim’s 5th birthday, meaning he was not between 8 and 60 months.

If the subcommittee wishes to specify an upper age range, staff does not support an upper age limit specified in months, as most incident, strength, and anthropometric data is not published with that level of granularity.

Comment #2 (section 2.a)

In addition, staff is concerned that the proposed scope statement, which mentions a singular gap, could limit safety improvements in the future.

Staff recommends the following changes to the scope statement 2.a.:

This safety specification is intended to minimize the injuries and deaths to children resulting from entrapment in ~~the gap created by the operation of the and around~~ the foot support lift mechanism, such as, but not limited to, the gap created by the operation of the foot support lift mechanism, of residential seating typically designed to recline.

Rationale:

Staff appreciates the focus on potential entrapment in “the gap created by the operation of the foot support lift mechanism,” but is concerned the wording of the scope statement, as drafted, limits work to only one gap. As evidenced by the data below, lifting the footrest exposes additional areas of entrapment underneath the chair. Staff reiterates³ concern with areas accessible when the footrest is raised. Staff’s April 2023 letter,⁴ cited in the “Preamble Language” section of the ballot, identified two potential hazard patterns:

1. Entrapment in the foot support lift mechanisms beneath the recliner, which is compounded by motorized lift mechanism.
2. Entrapment related to the movable foot support.

The data table in the aforementioned letter identifies two deaths associated with the area beneath the recliner, accessed when a child crawled underneath the recliner. In addition, there were three deaths associated with children being pinned underneath a footrest being lowered. Relevant fatal incidents from the original letter’s data table and the narrative quotes describing these hazards are included as an appendix to this letter. Staff is concerned that the

³ <https://cpsc.gov/s3fs-public/10-31-2024-ASTM-F15-42-Furniture-Subcommittee-Meeting-Log.pdf> “...staff expressed interest in addressing hazards related to the leg rest and space under the leg rest.”

⁴ <https://cpsc.gov/s3fs-public/CPSC-Staff-Letter-to-ASTM-15-42-Furniture-Safety-on-Recliner-Entrapment.pdf>

wording in the ballot, which identifies a singular gap, will limit the opportunity to address these additional hazards.

Staff looks forward to continuing to work with the subcommittee to address safety hazards associated with these products. If you have any questions, you may contact me at hnesteruk@cpsc.gov.

Sincerely,

Hope Nesteruk
Mechanical/Recreational/Sports Hazards Program Area Risk Manager
Office of Risk Reduction

cc: Molly Lynyak, ASTM F15 Staff Manager
Donald Mays, Chairman, ASTM Committee F15 on Consumer Products
Jacqueline Campbell, CPSC Voluntary Standards Coordinator
Han Lim, CPSC Mechanical and Combustion Hazards Program Manager

Incident #	Document #	Task #	Date	Age/Sex	State	Relevant Narrative Quote
1	I11B0179A	No IDI	09/11	2 YOF	CA	"...recliner chair what was extended and changing the diaper of the 10 month old child, when the subject crawled underneath the chair." ... "...found the subject lodged between a bar under the chair and the chair itself."
5	X13C0574A 131217CCC1216	131217CCC1216	05/13	4 YOM	FL	"CRAWLED UNDER AN ELECTRICALLY OPERATED MASSAGE CHAIR AND HIS HEAD BECAME CAUGHT BETWEEN TWO METAL BARS UNDERNEATH THE CHAIR"
6	130905CCC2971	130905CCC2971	07/13	5 YOM	OH	"...PINNED BETWEEN THE FLOOR AND THE FOOT REST OF A RECLINING CHAIR ..."
10	1927016367 X1990478A	No IDI	05/19	8 MOF	MN	"... WEDGED BETWEEN THE FLOOR AND AN ELECTRIC RECLINER'S FOOTREST THAT HAD BEEN POSITIONED IN THE LOWERED POSITION. "
12	X2191052A 220621HCC3020	220621HCC3020	08/21	4 YOF	TX	"THE GIRL WAS FOUND FACE-DOWN WEDGED UNDER THE RECLINED COUCH, UNRESPONSIVE, AND NOT BREATHING."