



November 3, 2022

**TRANSMITTED VIA EMAIL**

Mr. Richard Rosati  
Chair  
ASTM F15.42 Furniture Safety Subcommittee  
ASTM International  
100 Barr Harbor Dr.  
West Conshohocken, PA 19428-2959

Re: Statement for CPSC staff negative on ASTM Ballot F15 (22-17), Item 1

Dear Mr. Rosati:

U.S. Consumer Product Safety Commission (CPSC) staff<sup>1</sup> is casting a negative vote on the ballot for revisions to the ASTM F3096 Standard Performance Specification for Tipover Restraint(s) Used with Clothing Storage Unit(s)(F1500001722001).

The Commission's forthcoming final rule, Safety Standard for Clothing Storage Units, adopted on October 19, 2022, addresses inherent stability of clothing storage units under the most common forces generated during child interactions and for the most common ages (and weights) of children involved in tip-over incidents. For ASTM F3096, CPSC staff recommends considering forces children generate during interactions, as identified in that rulemaking, so that tip restraints used for products acquired before the rule takes effect will be effective. Based on staff analysis and data from the University of Michigan Transportation Institute (UMTRI) child-climbing study,<sup>2</sup> the proposed change to ASTM F3096 to increase the test weight from 50 pounds to 60 pounds may not represent the force on the tip restraint from child interactions. CPSC staff also recommends considering forces from other foreseeable interactions, such as bouncing, yanking, and jumping, along with forces from older, heavier, and stronger children. UMTRI researchers found that bounce, lean, and yank interactions were equivalent to an average force 2.7, 2.7, and 3.9 times the child's body weight, respectively, at a distance of 1 foot from the fulcrum.

Furthermore, CPSC staff recommends ASTM make other changes to the ASTM F3096 standard, including testing the connection of the tip restraint to the CSU and to the wall, because even a strong tip restraint will be ineffective if it detaches from the CSU, or if it pulls out of the wall.

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<sup>1</sup> 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.

<sup>2</sup> Reed, M., Ebert, S., Jones, M. (2020.) Forces and Postures During Child Climbing Activities. Technical Report, University of Michigan Transportation Research Institute (Tab R). Staff Briefing Package: Draft Notice of Proposed Rulemaking for Clothing Storage Units. U.S. Consumer Product Safety Commission, Bethesda, MD. Available at: <https://cpsc.gov/s3fs-public/Proposed%20Rule-%20Safety%20Standard%20for%20Clothing%20Storage%20Units.pdf>

Sincerely,

Kristen Talcott  
Project Manager, Clothing Storage Units  
Division of Human Factors, Directorate for Engineering Sciences

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