U.S. CONSUMER PRODUCT SAFETY COMMISSION
5 Research Place, Rockville, MD 20850

October 16, 2020

TRANSMITTED VIA EMAIL
Scott Lewis
Subcommittee Chairman for ASTM Bassinets and Cradles
ASTM International
100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

Re: ASTM F15.18 Bassinet and Cradles: Ballot F15 (20-09), Items #5, 6, and 7

Dear Mr. Lewis:

I[1] am voting negative for Ballot items #5, 6, and 7 – Compact Bassinet Definitions, Stability Test, and Side-Height.

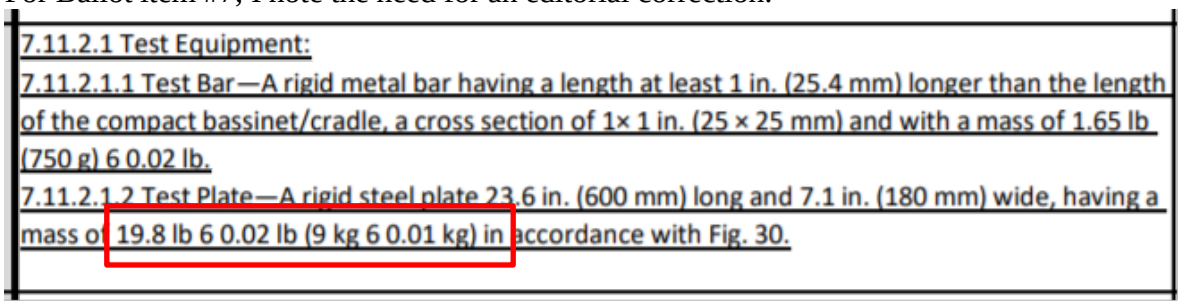
By this definition, compact bassinets are intended to be used on the floor and not on an elevated surface. However, based on data from other portable products, such as infant bouncers and car seats, it is reasonable to expect consumers to place a more compact and portable bassinet on a couch or bed. In this scenario, if the compact bassinet is knocked over, the occupant could be injured from the fall to the floor and/or could suffocate in soft bedding if the compact bassinet is tipped over while on a bed or soft surface. The proposed reduction in side-height and 20° inclined surface stability test for compact bassinets are less stringent and reduce safety compared to the requirements for traditional bassinets. The proposal eliminates the bassinet stability test (23 lbs vertical load and 5 lbs horizontal load that simulates a 2-year-old sibling pulling on the side) for compact bassinets. Because of this concern, CPSC staff recommends requiring the bassinet stability test for compact bassinets, and not just a tilt test.

CPSC staff is concerned that the subcommittee has not thoroughly researched the issues and potential hazards associated with compact bassinets. Compact bassinets are typically smaller and more portable than traditional bassinets, and may be used in a greater variety of ways compared to traditional bassinets. For example, placement on an unintended surface, such as a bed or sofa, creates potentially hazardous conditions, such as an inclined sleep angle, unknown stability conditions, and unforeseen interaction between the caregiver and product. Construction materials, such as cardboard, soft foam, or other non-rigid materials, would be permissible for

[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.

compact bassinets under the proposed standard, and, with the proposed elimination of side force stability requirements, compact bassinets may present additional hazards. Until CPSC staff has sufficient information that compact bassinets are safe for infant sleep, staff cannot vote in favor of removing or reducing requirements intended to address associated hazards.

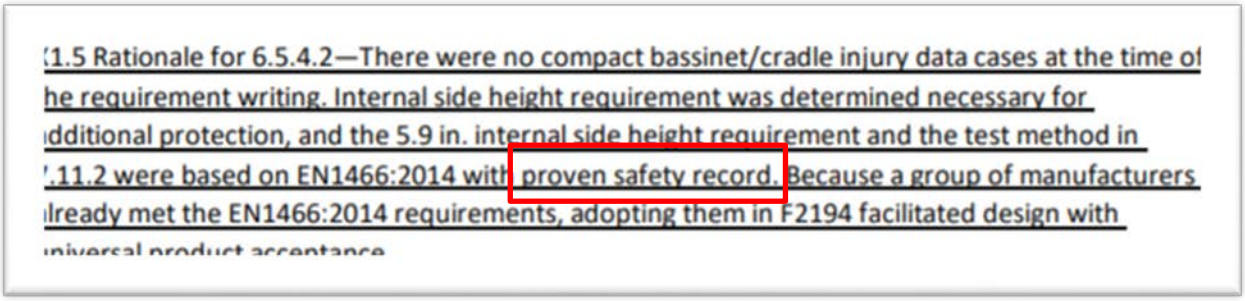
For Ballot item #7, I note the need for an editorial correction:



7.11.2.1 Test Equipment:
7.11.2.1.1 Test Bar—A rigid metal bar having a length at least 1 in. (25.4 mm) longer than the length of the compact bassinet/cradle, a cross section of 1× 1 in. (25 × 25 mm) and with a mass of 1.65 lb (750 g) 6 0.02 lb.
7.11.2.1.2 Test Plate—A rigid steel plate 23.6 in. (600 mm) long and 7.1 in. (180 mm) wide, having a mass of 19.8 lb 6 0.02 lb (9 kg 6 0.01 kg) in accordance with Fig. 30.

In the highlighted text, I believe the "6" is supposed to be "+/-," and, the tolerance should be stated as: "19.8 +/- 0.2". Other tolerances in the standard are only one decimal, not two.

CPSC staff also disagrees with the stated rationale for 6.5.4.2 in Ballot #7. A lack of incident data is not necessarily evidence of an absence of incidents, especially given that NEISS-reported incidents typically do not provide the detail needed to clearly differentiate compact bassinets from traditional bassinets. In addition, incident data are not tracked in the same manner in Europe as they are in the United States. Staff is concerned about whether this subcommittee thoroughly reviewed the information/data from Europe that purportedly support the rationale for this ballot. Therefore, staff does not agree with the characterization of EN1466:2014 as having a "proven safety record."



(1.5 Rationale for 6.5.4.2—There were no compact bassinet/cradle injury data cases at the time of he requirement writing. Internal side height requirement was determined necessary for dditional protection, and the 5.9 in. internal side height requirement and the test method in .11.2 were based on EN1466:2014 with proven safety record. Because a group of manufacturers lready met the EN1466:2014 requirements, adopting them in F2194 facilitated design with

Thank you for your consideration of these issues.

Sincerely,

Celestine T. Kish

Celestine T. Kish
Project Manager Bassinets/Cradles

cc: Molly Lynyak, Manager, Technical Committee Operations
Patricia Edwards, CPSC Voluntary Standards Coordinator
Hope Nesteruk, Children's Program Area Manager