



TRANSMITTED VIA EMAIL October 2, 2023

Michelle Barry & Tara Williams
Subcommittee Co-Chairs for ASTM F15.19
100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

Dear Ms. Barry & Ms. Williams:

U.S. Consumer Product Safety Commission (CPSC) staff¹ submits the following comments on administrative ballot F1519000223001 regarding WORK ITEM: WK81176 - Draft Standard Consumer Safety Specification for Wearable Blankets Intended for Use by Infants and Toddlers. At present, the draft standard includes wearable blankets and swaddles with weighted features within scope and includes in Table 2 the maximum weight limits (total and concentrated) for weighted products per age of the child.

CPSC staff favors keeping weighted products within the scope of the standard because adopting performance requirements, test methods, and labels/instructions/warnings for weighted products is an improvement in safety. Some of the basic safety requirements in the draft standard include fit (neck openings), fasteners remaining secured while in use, appropriate labels for user age/length/weight, and warnings about potential safety hazards (discontinue use of swaddles with signs of rolling). These performance requirements and warnings can prevent injuries associated with all infant wearable blankets, including products with weights or restraint features.

Although staff recommends balloting a draft standard to include weighted wearable blankets in scope, the allowable weights specified in Table 2 of the draft standard have not been demonstrated to be safe. For this reason, staff recommends removing Table 2 until additional research and testing and evaluation of the safety can be conducted. We would like to see ASTM continue work on wearable blankets with weighted features to develop performance standards that would not allow blankets that are unsafe; however, we do not have specific recommendations at this time. Staff appreciates the work of the subcommittee towards improving the safety of infant and juvenile products, and to better understand the hazards associated with such products. Feel free to contact me with any questions.

Sincerely,

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CC: Molly Lynyak, ASTM F15 Staff Manager
Jailynn McGhee, JPMA Government Affairs Standards and Certification Associate
Jacqueline Campbell, CPSC Voluntary Standards Coordinator

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