U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

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July 28, 2003

Mr. Bill Perdue
ASTM Subcommittee F15.30 on Bunk Beds
American Furniture Manufacturers Association
317 W. High Ave.
High Point, NC 27261

Dear Mr. Perdue:

On September 26, 2002, The Danny Foundation petitioned the U.S. Consumer Product Safety Commission (CPSC) to "institute mandatory safety standards banning finials and corner post [extensions] from bunk beds."[1] The petitioner is concerned that protruding corner post extensions and finials are hazardous catchpoints upon which children can become hung.

The CPSC staff is in the process of preparing a briefing package that will form the basis of a Commission decision on whether to grant the petition and initiate a rulemaking proceeding or to take some other action. The package is scheduled to go to the Commission soon. We understand that a draft voluntary standard for bunk bed corner post extensions has been proposed and will be discussed at the August 7th meeting for ASTM Subcommittee F15.30 on Bunk Beds. We invite you to provide us with a letter of commitment that work on performance requirements will begin. We would like to forward that letter with the briefing package for Commission consideration. It would also be helpful if you provide a preliminary timeline for developing a new standard specifically for corner post extensions or for incorporating new requirements into the existing voluntary standard for bunk beds. CPSC staff plans to attend the August 7th meeting and we can discuss this request with you at that time.

CPSC staff has reviewed the incident data associated with bunk bed corner post extensions and finials as well as bunk bed-related hanging incidents in general. Children have strangled after they became caught on the bunk bed corner post extension by an item around their necks and when they became entangled in a product that was placed over the corner post extension. However, corner post extensions and/or finials are not the only catchpoints upon which children have become hung. The CPSC incident data show cases involving the tops of ladders and other parts of the bed. Summaries of the epidemiological data are enclosed.

[1] The petitioner has requested a ban of corner posts and finials; it is assumed that the petitioner's intention was a request to ban corner post *extensions* and finials.

We believe that the expertise of the members of the bunk bed subcommittee would contribute substantially to the development of effective and practical performance criteria to address corner post extensions, finials and other potentially hazardous catchpoints on bunk beds. CPSC staff would like to attend future meetings and to participate in the development of voluntary performance requirements to address strangulation hazards on bunk beds. This letter conveys the views of the CPSC staff, and has not been reviewed or considered by the Commission.

Sincerely,

Debra Sweet
Project Manager

Enclosure(s)
CPSC Incident Data

cc:
John Blair, Chairman
ASTM Committee F15 on Consumer Products
Lee Baxter, Chairman
The Danny Foundation