



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

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Ms. Joan Lawrence
Chair, ASTM F15.22 Subcommittee
Toy Industry Association
1115 Broadway, Suite 400
New York, NY 10010-2803

Dear Ms. Lawrence:

This letter* is to request that the ASTM F15.22 Subcommittee establish a working group to address overheating and fire risks associated with rechargeable batteries used in toys. The working group would be responsible for developing proposals for inclusion in ASTM 963, *Standard Consumer Safety Specification for Toy Safety*, to address these hazards. The U.S. Consumer Product Safety Commission (CPSC) staff is interested in participating in such a working group.

During the past several months, CPSC staff has seen an increase in the number of incidents with rechargeable high energy density batteries used in toys. Incidents have included overheating, venting, smoking, explosion, and ignition of battery packs. Toys that have been involved in incidents have been powered by nickel metal hydride, lithium-ion, and lithium polymer battery packs; and some did not have any integral protection against overcharging, short circuiting, or overheating. The toys also included chargers that do not have charge control circuitry to protect against overcharging. Protection circuitry incorporated into both the battery pack and charger is essential to provide a robust system to prevent short circuits, overcharging, and overheating that can result in battery venting, fire, and explosion.

* These comments are those of the CPSC staff, have not been reviewed or approved by, and may not necessarily represent the views of, the Commission.

Thank you for your consideration of this matter. Please contact me if you have any questions or would like to discuss this matter further.

Sincerely,

A handwritten signature in cursive script that reads "Douglas A. Lee".

Douglas A. Lee

cc: Colin Church, CPSC Voluntary Standards Coordinator