



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

May 14, 2008

Mr. Bill Suvak
Chairman, ASTM Crib Standard Subcommittee
1010 Keller Drive NE
New Salisbury, IN 47161

Re: ASTM F1169 *Standard Specification for Full-size Baby Cribs*

Dear Mr. Suvak:

This letter presents recommendations from the U.S. Consumer Product Safety Commission (CPSC) staff¹ regarding revisions to ASTM F1169 *Standard Specification for Full-size Baby Cribs* to address hazards posed by cribs with sides that can be assembled backwards or upside-down. Some crib designs give the appearance of proper assembly with the drop-side inverted. In this configuration, the drop-side can detach from the crib, possibly creating a dangerous gap that may lead to the entrapment and suffocation of infants. CPSC staff is aware of four deaths where the crib's side was installed upside-down². These deaths included a 6-month-old child, a 7-month old child, a 9-month-old child and a 1-year-old child.

Crib failures can result from a combination of hardware and crib design, which allows consumers to install one or more of a crib's components (a side or mattress support platform) in an incorrect orientation while giving a visual appearance that the crib was assembled correctly and without affecting the crib's first or primary use. In some circumstances, such improper assembly can result in unforeseen stresses on the hardware used to secure that component to the rest of the crib. This may contribute to the component detaching from the crib. When a crib side or the mattress support detaches in one or two corners, it creates a gap that can entrap infants. At the April 1, 2008 ASTM subcommittee meeting on full-size cribs, a requirement for drop sides that are assembled by consumers was proposed by the task group assigned to this matter. The requirement stated that a drop side intended to be installed in a defined orientation must meet one of two conditions:

1. It can only be assembled to the crib in one orientation and function as specified in the instructions, or

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

² 061129HBB2115, 071114HCC1107, 070726CAA3587, and 050615CWE5015

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2. If it can be assembled in any other orientation, a label must be provided to clearly indicate the proper orientation.

In order to properly address this hazard, CPSC staff recommends that the requirements proposed by the task group be expanded to include all sides and the mattress support platform and that a third requirement be added as follows:

Crib designs that permit backwards or inverted assembly of the drop sides, stationary sides, mattress support platforms, headboards or footboards, shall pass all applicable performance tests in the misassembled state.

If you have any questions regarding this recommendation, please feel free to contact me. Thank you for your consideration of this important consumer product safety concern.

Sincerely,



Jonathan Midgett, Ph.D.
Directorate for Engineering Sciences

cc: Len Morrissey, ASTM International
Colin Church, CPSC Voluntary Standards Coordinator