



United States
CONSUMER PRODUCT SAFETY COMMISSION
Bethesda, Maryland 20814

MEMORANDUM

DATE: February 12, 2007

TO : ES

Through: Todd A. Stevenson, Secretary, OS

FROM : Martha A. Kosh, OS

SUBJECT: Carpet and Rug Technical Amendment

A handwritten signature in black ink, appearing to be "M. Kosh", written over the "FROM" line.

ATTACHED ARE COMMENTS ON THE CH 07-2

<u>COMMENT</u>	<u>DATE</u>	<u>SIGNED BY</u>	<u>AFFILIATION</u>
CH 07-2-1	12/11/06	Paul T. O'Day President	American Fiber Manufacturers Association 1530 Wilson Blvd., Suite 690 Arlington, VA 22209
CH 07-2-2	3/22/07	Raminder Sidhu	<u>rs.sidhu@ties.itu.int</u>

*Carpet & Rug
Tech Amend***Stevenson, Todd A.**

From: Paul O'Day [oday@afma.org]
Sent: Monday, December 11, 2006 4:25 PM
To: Stevenson, Todd A.
Subject: CARPET AND RUG TECHNICAL AMENDMENT

Memorandum To: Consumer Product Safety Commission

Reference: Fed. Register, Vol 71 No. 218, Nov. 13, 2006 66145-66147 [E6-19095]

Subject: Carpet and Rug Technical Amendment

The American Fiber Manufacturers Association, Inc. (AFMA) appreciates the opportunity to comment in support of the proposal by the US Consumer Product Safety Commission (CPSC) to amend CFR Parts 1630 and 1631 to incorporate technical specifications for the ignition source *in lieu* of the designation of a specific product and producer as specified in the current regulation.

AFMA is the US trade association for domestic producers of manufactured fiber, much of which is used in the manufacture of carpets and rugs. Many of our member companies and their downstream customers use the test specified in CFR 1630 and 1631 for quality control and new product development. The tablets from the Eli Lilly Company specified in the current version of the test method are no longer widely available. Allowing the use of methenamine tablets from any source that produces the requisite ignition characteristics, as proposed, is expected to reduce testing costs and should improve the reliability of test material supply. Since CPSC staff has reportedly determined the ignition characteristics of the Eli Lilly product and has drafted specifications based on those characteristics, adoption of the proposed changes will not result in any diminution of protection for consumers.

Please contact us if additional information would be helpful to the Commission on this subject.

Respectfully submitted,

Paul T. O'Day, President
American Fiber Manufacturers Association

1530 Wilson Blvd., Suite 690
Arlington, VA 22209
703 875 0432

*late
Carpet
Comment***Stevenson, Todd A.**

From: Anne Meininger [anne.meininger@nist.gov]
Sent: Thursday, March 22, 2007 12:25 PM
To: Stevenson, Todd A.; Adair, Patricia
Cc: WTO TBT comments traffic - USG :
Subject: India submits comments on "Carpet and Rug Amendment" via WTO

Hello CPSC,

Please accept the below comments submitted by India on the recent USA WTO TBT notification reported from the CPSC's proposed rule in the Federal Register on January 12, 2007:

[Federal Register: January 12, 2007 (Volume 72, Number 8)]

[Page 1472]

[DOCID:fr12ja07-21]

CONSUMER PRODUCT SAFETY COMMISSION

16 CFR Parts 1630 and 1631

Proposed Technical Amendment to the Flammability Standards for Carpets and Rugs; Notice of Opportunity for Oral Comment

AGENCY: Consumer Product Safety Commission.

ACTION: Proposed rule.

<http://a257.g.akamaitech.net/7/257/2422/01jan20071800/edocket.access.g-266.htm>

Comments from India follow:

----- Original Message -----

From: R.S.SIDHU <rs.sidhu@ties.itu.int>

To: cpsc_os@cpsc.gov <cpsc_os@cpsc.gov>

Cc: Shub, Rachel A.

Sent: Thu Mar 22 10:09:46 2007

Subject:

Dear All,

This relates to the US notification no. G/TBT/N/USA/234 on flammability requirements for woolen carpets. We understand that this requirement should not be mandatory as woolen carpets have inherent flame retardancy. Accordingly, the proposed amendment by Consumer Products Safety Commission, USA appears to be trade restrictive if testing for flammability is a mandatory requirement.

Regards,

Raminder Sidhu

Minister

Permanent Mission of India to the WTO

9, Rue du Valais,

3/23/2007

1202 Geneva
Tel.: 022-734 1978
Fax: 022-738 4548

Please acknowledge receipt of these comments by return email -- and please contact me if you have any questions.

Thank you very much --
Anne Meininger

*USA WTO TBT Inquiry Point
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National Institute of Standards and Technology
100 Bureau Drive, MS-2100
Gaithersburg, MD 20899-2100
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