

**MEETING LOG
DIRECTORATE FOR ENGINEERING SCIENCES**

SUBJECT: Juvenile Products, ASTM F15 Subcommittees

LOCATION: ASTM Headquarters, West Conshohocken, PA

DATE: October 15-18, 2002

ENTRY DATE: October 25, 2002

**LOG ENTRY
SOURCE:** Patricia L. Hackett



**COMMISSION
ATTENDEES:** Patricia Hackett, Scott Heh, Jonathan Midgett, Carolyn Meiers, John Murphy, Caroleene Paul, Susan Perkins

**NON-COMMISSION
ATTENDEES:** Various ASTM Subcommittee members
(refer to ASTM meeting minutes for details)

**MEETING
SUMMARY:** See Attached summary by date and meeting.

CPSC & ASTM Clear 10/29/02
No Mfrs/Private on
Products Identified
Submitted by

*F15 Juvenile Product Subcommittee Meeting Summary
Oct 15-18, 2002*

*Stationary Activity Centers
Tuesday, October 15, 2002*

Discussed Encl. B of the agenda and the pros and cons of having developmental milestones required. This led to the decision to allow the manufacturer to specify the most appropriate minimum and maximum ages for their product and for the standard to specify examples, but not require exact wording. Also discussed Encl. C, "Marking and Labeling" specifications about contact information and decided to leave it to the Ad Hoc committee decision which would occur later in the day. New business included discussion of the exact wording required for the attendance warning and the warning to keep away from "stairs," which seemed to the committee to be better worded as "steps" because some homes just have a single step that can be just as hazardous as a stairway. A task group led by K. Pilarz will address the issue for the next meeting.

*Walkers
Tuesday, October 15, 2002*

The task group for the care of stopping components proposed the following wording, "Clean friction components regularly to maintain maximum stopping performance." This passed and will be included in the product instructions. New business included the decision to include the relevant Ad Hoc committee decisions and send this standard to ballot. Also, the Consumer's Union reported having found a product that had friction strips detach in testing. A task group to examine the issue of durability of friction strips was formed. W. Freitag will chair.

*Gates and Enclosures
Tuesday, October 15, 2002*

Ballot negatives and comments were reviewed. A negative from Jon Robinson, regarding wording for accessibility was withdrawn. A negative for the Push out Test for Wall Mounted Gates was discussed. The task group reviewed their report. Wording edits were suggested as seen in Enclosure C of the Agenda. The major points were to change the push out test from 100 pounds to 45 pounds force. Also, to change the location of one test from center to bottom corner.

Discussion was held concerning pressure vs. hardware gates - push out test results. According to 5.10, any gate that fails the test can simply include a warning and it will then be in compliance. Is this only for pressure gates or all gates? Should standard allow for pressure gates to fail? Should all pressure gates have warning labels? A task group formed to review the requirements. CPSC will participate (C. Paul).

Agenda item: Adult injuries. Incident data (NIESS) collected by Marcy Ridenour was enclosed in Enclosure D of the agenda. Discussions regarding whether or not adults injuries constitutes a hazard. A motion was made to close the issue as being out of the scope of the product after a review a the data. Motion passed and issue is closed.

Agenda item: Hardware Incidents. Incident data was distributed. John Preston brought up the point that many of the IDI's had "plastic" parts breaking. CPSC has been asked to look at the un-purged IDI's and determine if there are any similarities between brands/designs. John Preston, Rick Glover to help in task group review after data is reviewed. (C. Paul).

*Toddler Beds
Tuesday, October 15, 2002*

Ballot negative votes reviewed. There were three negatives (two from Malcho, one from Phillips) and all were voted non-persuasive. Comments were addressed; many were editorial and were incorporated others were duly noted and not incorporated. Standard to be re-balloted to uphold the non-persuasive votes.

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*Bassinets and Cradles
Tuesday, October 15, 2002*

Agenda Item: Side Height Requirements. Proposal regarding side height requirements was discussed. Primarily the 8 inches requirement was questioned as to rationale or justification. Motion made to table this discussion to the next meeting and a request was made to solicit information from manufacturers as to product information. CPSC has been asked to update the data regarding bassinet falls possibly related to side height (EPI). These two items will be placed on the agenda. Motion passed.

Memory sheet items:

- 1) Battery compartments, due to lack of incidents, this will be dropped
- 2) Restraints, will keep it on pending next meeting
- 3) For section 7.5.1.4, – direction of load is not clear. Suggested wording to clarify the direction to be "in the direction of how the product folds". To go out on the next ballot.
- 4) Openings – wording change suggested by the Ad Hoc committee for all juvenile products was approved. To go out on next ballot
- 5) Sleep Statement – wording approved. To go out on next ballot

Ballot mailing date to be determined for the last three items above.

New business: Mattress flammability regulation. Juvenile products are exempt and examples given but bassinets are not mentioned. Are the pads used in bassinets exempt? CPSC has been asked to answer this question (S. **Bathalon**).

*Changing Tables
Tuesday, October 15, 2002*

Stability requirement discussed for the proposed standard. Wording was proposed and reviewed. Discussion centered on purpose for the test. Was it relating to a sibling hanging on the outside or a user rolling up against the edge? The Sub-committee agreed that the purpose was the latter example, and that because a caregiver is supposed to be present, the sibling scenario was not an issue. The sub-committee decided to include a diagram to show how to conduct the test.

Entrapment in openings associated with shelves performance requirement was drafted. Proposed wording reviewed and approved as written.

Contour changing pads. Task group recommended changing the barrier test rolling cylinder from 12 inches to 4 inches in length (keeping 8 inches diameter and 33 pound weight the same). Purpose of the change is to be able to test all four sides of the changing tables. This will eliminate any two-sided contour changing pads being sold as changing tables. Discussions were held regarding what products are included in the standard. Contour pads, and other stand alone components when combined to function as a changing table, do not fall within the scope of the standard. A changing table as defined in the standard is a free-standing unit sold as a changing table. Testing is to be performed on the unit and the pad supplied with the table.

Changing table attachments to bassinets/play yards – the definition was not changed and therefore play yards with changing table attachments are included in the scope of the standard.

It was decided that the instructional literature shall have a warning to "only use changing pad provided by the manufacturer."

*Commercial Cribs
Wednesday October 16, 2002*

Jim Dodge from LA Baby addressed the subcommittee and provided a letter outlining concerns with the state of hotel and day care cribs. CPSC statistics were discussed. The subcommittee discussed the differences between commercial use and domestic use. It was decided to pursue the issue but that additional information is needed regarding use, and incidents. CPSC was asked to provide incident data for hotels and day cares and cribs (EPI). The proposed standard will target hotel/motel/resorts, day care facilities, and rental units. It most likely will not cover hospital cribs.

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Proposed Title is "Commercial Cribs" and it will be a separate and new subcommittee.

Issues to be addressed:

- 1) Warnings; language and placement
- 2) Folding and latching mechanisms
- 3) Storage
- 4) Evacuation cribs
- 5) Maintenance
- 6) Mattresses

Next meeting will be separate from the F15 committee meetings and will be a full day long. Tentative schedule is January 2003. CPSC to participate (**P. Hackett**).

Full Size Cribs
Wednesday October 16, 2002

The crib corner post extension standard (F966) and the full size crib standard (F1169) were combined in a draft form to be one standard. The draft was reviewed. Additional discussions occurred regarding other aspects with the standard such as wording on the labels. Some members wanted to change the labeling requirements to allow for flexible wording. Others felt that it should be specific but that they need to be reviewed to make sure the intent is conveyed. The subcommittee also looked at adding some sort of coding to allow for tracing back to a specific lot. The ad hoc wording will be used. Once the details are incorporated, the combined standard will go out as a concurrent ballot.

Catch points on cribs – data provided by CPSC was reviewed. Most incidents were determined to have occurred on either non-full size cribs or on older cribs, which may not have been covered under the current crib post extension standard. It was decided to table this issue.

Bumper pads attachment to Solid End panel cribs – This data was briefly reviewed and due to the lack of details regarding the style of crib in the incidents and the contribution of crib to the death, no further action will be taken. The data will be included with the minutes.

Crib Hardware – CPSC staff reviewed the crib hardware project status and information pertaining to the study and discussed briefly the 29 fatal incidents and 95 non-fatal incidents. A spreadsheet pertaining to the 95 non-fatal incidents was provided for reproduction and distribution. In the CPSC staff letter sent to the Subcommittee chairman, staff asked for the formation of a task group to look into the hardware problem. Sub-committee Chairman Bill Suvak complied by appointing a task group in which CPSC will participate (**P. Hackett and S. Bathalon**). CPSC staff has been asked to provide IDI's for the 29 deaths for distribution to the task group (**EPI**).

Play Yards and Non-Full Size Cribs
Wednesday October 16, 2002

Cord Length Task Group – The task group rewrote section on 5.12 on Cord Length to clarify a conflict.

Labeling to Address Infant Sleep Position – *To reduce the risk of SIDS, pediatricians recommend healthy infants be placed on their backs to sleep, unless otherwise advised by your physician.* - This wording has been discussed in the bassinets/cradle subcommittee. A motion was made and passed to ballot it for addition to the play yard standard in both the warnings and instructions.

Compliance to 16 CFR 1500.44 – This regulation is referenced in the standard but no explanation is provided regarding its compliance. A motion was made and passed to add a general requirement to section 5.3 that provides this information.

Changes to the Definition of an Opening – The strollers subcommittee balloted and approved new wording regarding opening developed by the Ad Hoc committee. The play yards subcommittee agreed with the new wording but discussions were held regarding what part of the product shall be tested. Strollers test the entire product. It was argued that the underside of a play yard and non-full size crib would not be accessible to the

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occupant and design changes would be required if these areas had to be tested. This section was tabled until the next meeting allowing manufacturers to review accessibility with their products.

Corner Post Requirements – Since the standard has been combined and now includes non-full size cribs, the requirements found in F966 should also be included in this standard. Requirements were drafted and discussed. A motion was made and passed for the reworded requirements.

The new standard implies that the CFR 1509.11(b)(1) warning label can be omitted if an NFS crib bears the label required by 9.4.2 of F406-02. Need proposed wording to clarify. Next meeting, CPSC has been asked to make recommendations regarding the warnings and compliance with the CFR (**J. Midgett and S. Bathalon**).

Bath Seats

Wednesday October 16, 2002

Reviewed the comments to the ballot. No negatives were received on the sub-committee ballot. Comments were all resolved. Comments submitted by CPSC staff were all agreed to.

Stability Task Group Report - Jeff Lipko reported for the task group. The requirements for testing on a non-skid surface, as proposed by CPSC staff were reviewed and discussed. The committee wanted to review the requirements in writing. Jeff has been tasked with putting it in writing and distributing it to the subcommittee. Manufacturers will evaluate and it will be discussed at the next meeting. Occupant Retention was discussed and CPSC staff reviewed the proposed warning. Discussions were held regarding the wording of the warning. It was also decided to include it in the write up with the stability test for review and further consideration.

CPSC staff updated the committee on the status of the NPR package. Paul Ware updated the group as to the incident data (supplied by CPSC).

Bed Rails

Wednesday October 16, 2002

Task group reported on Round Robin testing. Task group recommends

- sheets will remain in the test requirements.
- Enclosed openings test was modified to test off the mattress.
- Clarifications to the displacement test were made to help with the precision and accuracy between test labs.

The remainder of the negatives from the March 2002 ballot were reviewed. Rick Feener and John Preston's negative regarding the use of platform #3 while warning against the use on bunk beds were found persuasive. The sub-committee voted to eliminate platform #3 from the standard.

Warning issues were discussed:

- Warnings were discussed to account for possible misuse. The phrase "Death or serious injury can occur" was added and will be of the same size as the WARNING and safety alert symbol.
- Should the warnings to be exactly as stated? Motion made and passed to require only the new phrase above and the phrase "Suffocation and Strangulation Hazard" to be exact wording only. The remainder of the statements shall be addressed.
- Do the warnings have to be conspicuous when in manufacturers use position? After much discussion concerning the amount of space a product has to display warnings, the subcommittee voted that they must be conspicuous.
- "ALWAYS keep bed rail pushed firmly..." was voted to not be required on the packaging of the product only on the warning label.

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The "openings" statement, as written for the stroller standard needs to be added to this standard (the ad hoc group wording was accepted).

Minimum and maximum height requirements were put on Memory sheet.

Can the specification refer to a specific mattress or manufacturer? CPSC supplied the information pertaining to the mattresses used for our testing and it will be referenced as a footnote in the standard.

Changes to the probe were discussed:

- radius added to the nose,
- webbing material added to aid in pulling the probe,
- material spec changed to sanded hardwood.

***Crib Sheet Retention Devices
Thursday October 17, 2002***

This was an organizational meeting called to order by Bob Waller of JPMA. The purpose is to determine if there is a need for a new standard. CPSC discussed data involving a few incidents (no injuries) dealing only with retention devices or specialty made sheets.

Included with the agenda was a draft standard prepared by Houser (sp?) Labs for one of the manufacturers (Baby Sleep Safe). The basic performance requirement drafted in the standard is a pull off force of 10 pounds when tested in accordance with the standard.

Bob Waller specifically addressed manufacturers of such devices, looking for a commitment from them before proceeding with the standards development.

***Infant Bedding
Thursday October 17, 2002***

Agenda Item: Crib sheet Round Robin Test results. The test data showed variation between the five labs. The subcommittee also reviewed the crib sheet testing procedure as videotaped by Good Housekeeping. The data will be analyzed differently and all the labs will repeat the testing, on video, with electronic gages so that greater repeatability can be achieved.

There was a task group report regarding the labeling of bedding products not to be used by children under the age of 12 months. The last group phone conference decided that in lieu of a labeling them, an information and educational campaign shall be undertaken. Chairman Waller solicited suggestions for what types of information should be included.

***High Chairs
Thursday October 17, 2002***

Agenda Issue: Tray disengagement. A draft proposal to the standard to prevent children from disengaging high chair trays was introduced and discussed. The draft proposal applies to trays that have front and side latches and are affixed to passive crotch restraints. Requirements focuses on the accessibility of the latches by childrens' hands and feet. If accessible, the latch would be force- tested to insure compliance. A secondary lock (or dual action lock) is would be considered an acceptable option. The Subcommittee is looking for guidance from CPSC regarding forces that a child could generate kicking a lock forward, kicking a lock upward, pulling (with toes/feet) back toward the child, hand (side) forces for a child to release. The draft proposal currently requires a force of 75 pounds. The subcommittee is also looking for accessibility dimensions (i.e., foot distance to the release mechanism). Also looking at the tray disengagement incidents to determine the type of release mechanisms involved in the incidents. For the next meeting, CPSC will review available data that to determine whether falls are occurring with high chairs that have passive crotch restraints that are independent of the tray. The objective is to determine if the proposal should also include high chairs with this type of passive restraint system. (C. Meiers and J. Midgett).

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Section 9.8 of the standard (Restraint system retention test) was discussed. CPSC and a few manufacturers acknowledged that the requirement was not sufficient to test occupant retention and could be improved.

Further discussion comparing 5 point and 3 point harnesses resulted in a general consensus that an effective restraint system will not prevent all children from getting out. This led to discussions regarding section 6.9 (Passive Crotch Restraint System) and the dimensional requirements of the chair (8.5-inch distance from the back of the chair to the back of the passive crotch restraint and leg openings). CPSC stated smaller leg hole openings and the reduction of "wobble-room" afforded by the 8.5-inch distance requirement for passive crotch restraints was a more effective way to keep a child from standing up and getting out of the chair than the typical strap restraint system currently used for high chairs. Some manufacturers felt that requiring both of these provisions would make the chair too small and it would be difficult to get the child in and out. Manufacturers were asked if both the 8.5 inches and the leg-opening requirement should be met? CPSC staff recommends that they should. Cosco (Dorel) has a model that has been out on the market for a year that meets both requirements. They will look at customer complaints to determine if the any complaints on the size of the chair were received. Graco also has had a chair that meets both requirements on the market for 4 years and they have not gotten any negative feedback from consumers. There was some acceptance for the implementation of both of the requirements.

Questions were posed about the possibility that other means may be available to restrain children rather than adhering to both provisions. One suggestion focused on the three dimensional space through which a child's leg passes in order to draw it into the seating compartment. CPSC was asked for some anthropometric data for smallest to largest user to re-evaluate the volume of space in the high chair seat area (**C. Meiers**). A Task Group was formed to look at this issue before the next meeting. The task group is to meet within the next month for further discussion. CPSC to participate (**C. Meiers**).

Five Point harness system task group report – Keep it as an optional accessory, not a requirement. Currently, no recommendations are being made to modify the standard. No performance testing for 5-point harnesses will be included in the standard. More study is needed.

CPSC was also asked for an update of incident data for high chairs (**EPI**).

*Strollers and Carriages
Thursday October 17, 2002*

Accidental Collapse Task Group Report – Presently there is a 45-pound static latch test applied in the direction of fold. Task group exploring other tests, such as curb test that was rejected as not meeting our needs.

Review of the IDI's of collapse showed the following breakdown of causes:

- 9 unknown causes
- 8 latch broke
- 5 false locked
- 3 wear is a factor

Explored impact testing and dynamic testing. Need to insure that the latch is being tested, and not the frame. Task group formed to develop impact testing, CPSC to participate (**J. Murphy and C. Paul**).

Proposal for Occupant Retention Area – ITS testing lab requested clarification of the requirements for occupant retention area for carriages. Section 6.5 was modified to indicate that walls are required to surround the occupant area. The changes were approved and placed on the memory sheet for the next ballot.

Restraint issues – Task group formed to brainstorm possibilities for more effective restraint system. First meeting will be via phone conference. Group members are to come prepared with suggestions. Additional meetings with task group member in attendance are foreseen. CPSC to provide via email the different types of escape routes seen as well as the type of strollers involved in the incidents. (**C. Meiers -one month due date**).

Vertical Pull test vs. 360-degree test – Two manufacturers reviewed and one states that they are both comparable and the other said that 360 was more stringent. No further action on this item until the restraints task group concludes its findings.

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Definition to install occupant retention device. Task group will re-word and present at the next meeting. Focus in on providing definitive illustrations and wording for activating leg-hole closures for convertible carriage/strollers. This information must be clearly visible to consumers.

Jogging Strollers – CPSC incident data reviewed. At issue was whether jogging strollers are adequately covered under the existing stroller standard or whether there should be a separate standard for jogging strollers. Due to the lack of representation of jogging stroller manufacturers at the meeting, no progress was made on this issue. Discussion was held about how many jogging strollers are being sold that actually comply with the current stroller standard. The two manufactures of jogging strollers who were at the meeting stated that their jogging strollers complied. It was decided that JPMA would contact the manufacturers again regarding their attendance at the ASTM meetings. It was mentioned that a number of jogging stroller manufacturers are not members of ASTM. CPSC will look into whether or not we can also make contact to solicit attendance at the next meeting (**S. Heh**)

CPSC asked to update jogging stroller data (**EPI**).

*Infant Swings
Thursday October 17, 2002*

Battery Leakage Issues – Incidents reviewed and a section from the Toy Safety Standard dealing with protection for reverse polarity was reviewed and approved to be added to the standard on the next ballot.

Restraint requirements – The subcommittee decided to hold off on any action dealing with restraints pending action from the high chair and stroller subcommittee.

*Soft Infant Carriers
Friday October 18, 2002*

Review of comments from sub-committee ballot.

- K. Pilarz commented on repeatability of the dynamic test. Members who have conducted the test reported that it was acceptable as written.
- CPSC comments addressed:
 - 1) One shoulder carriers: Manufacturers stated that there are models that use only one shoulder but are not slings, thus the description was left as is.
 - 2) Dynamic Test – 7.2.2. CPSC questioned the statement to allow adjustments to be made to maintain the 1-inch height drop through out the 1000 drops. The subcommittee discussed the differences between the walker test and the bouncer test. Walker testing is 100 cycles only vs. 1000 cycles for carriers. Carriers are to simulate the walking of the caregiver possibly causing a one-inch bounce of the occupant. If the material stretches or the entire carrier shifts lower on the caregiver, the occupant would also “stretch” or shift with the carrier, thus the 1-inch would be the constant. Wording changes were recommended to clarify that straps/buckles could not be adjusted if they slip.
 - 3) Changes to the Warning Label. Suffocation hazard was removed based on lack of data. Statement describing the fall hazard was added, “Small Children can fall through leg opening. Follow instructions for use.” For units that have adjustable leg openings, the following is also present on the warning label: “Adjust leg openings to smallest possible size.” The other two statements dealing with weight of the child and position were discussed and the subcommittee decided to keep them on the warning label.
 - 4) Test Sphere: The subcommittee accepted the recommendation to change the material from ABS to any smooth rigid material. The surface finish was also removed (with the addition of the word smooth in the material description).
 - 5) Dynamic testing development to continue: A task group was formed to explore additional dynamic tests to simulate the bouncing action by the caregiver on the effects of falls through leg holes. CPSC to participate (**J. Murphy**).

Why is it mandatory for a model number to change if product is changed? Discussions were held and the subcommittee decided that the last sentence and last phrase of first sentence of 8.1.2 was to be removed.

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Frame carriers – Task group formed with CPSC participating (**J. Murphy**) to develop a draft standard. CPSC asked to provide an update of data for both frame and soft carriers (**EPI - Can the data be separated by type of product?**)

***Bouncers
Friday October 18, 2002***

Law label requirements - Can the manufacturers information be added to this label so that there is only one label? Reviewed information from the Association of Bedding and Furniture Law Officials regarding consolidation of labels and they have not approved such a label but will be put before the membership for review and voting. Should the subcommittee allow it, as long as it meets the permanency requirements was discussed.

Multi-purpose products. How does the labeling effect those products that are designed for children older than 6 months? (Bouncers that convert to rockers, etc.). Task group formed to review the products and develop wording to address.

***Hand Held Carriers
Friday October 18, 2002***

Reviewed CPSC data involving carriers on soft surfaces turning over. No additional incidents from what was distributed last spring and details on three of the six incidents were provided. No action was taken, the group will continue to monitor this hazard.

Restraint System Tightness – Task group recommended replacing the “finger” test with the same requirements as in the stroller specification. This requirement uses the webbing tension device to provide a ¼ inch gap between the waist restraint and the CAMI doll prior to applying the pull force to the leg of the dummy. Test labs commented that this change makes the test more complicated and didn’t improve consistency of test results. In addition, some carriers do not have waist restraints; thus wording would have to be modified. A motion was made to not accept the recommendation, but to leave the requirement as is was made and seconded and passed.

CPSC reports that there were no known incidents with Moses baskets.

Requirements for Latching or Locking Mechanism – The memory sheet has a comment that a general requirement be added for latching or locking. It had been previously removed because there were no tests for it. Discussions were held on whether it was necessary to put it back in and simply reference the handle testing. Since there is a specific performance requirement for the handles in section 6.0, this was felt to be redundant. Another alternative was to add a more comprehensive test similar to the stroller standard to include other possible latches. Currently, the committee is aware of only one model carrier that actually “folds”. There are no known incidents with that model thus it was moved and passed that the standard be left as is, with no additional requirement added.

There were several editorial changes and Ad Hoc committee changes to the current standard that will be balloted as a concurrent sub-committee and main-committee ballot.

***Hook-On Chairs
Friday October 18, 2002***

The last meeting was March 1998. This meeting was called for the 5-year review of the standard and to make the Ad Hoc changes to the standard. These changes were reviewed. Only specific word changes will be sent out to ballot. Formatting changes will not be included.