



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 East West Highway, Bethesda MD 20814

April 4, 2014

Mr. Mike Steinwachs
Subcommittee Chairman for ASTM Infant Inclined Sleep Products (Ballot)
ASTM
100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

Re: ASTM F15.18 Infant Inclined Sleep Products (Ballot)

Dear Mr. Steinwachs:

This letter contains U.S. Consumer Product Safety Commission (CPSC, Commission) staff's comments in response to Item 1 – 1/08/2014 WK45274 for a new *Standard Consumer Safety Specification for Infant Inclined Sleep Products (Ballot)*. These comments provide corrections of technical errors in the draft balloted standard and editorial suggestions for improving the technical provisions of the draft balloted standard. The views or opinions expressed in this letter are solely those of the staff, and these views and opinions do not necessarily represent those of the Commission.

The draft language of the balloted standard is included below. CPSC staff's comments are shown by ~~strikeout~~ and underline, where ~~strikeout~~ represents removed text, and underline represents added text):

5.1 *Lead in Paints* – The paint ~~or~~ and surface coating shall conform with 16 CFR 1303.
~~5.4 The paint and surface coating on the product shall comply to 16 CFR 1303.~~

CPSC Staff Rationale: 5.4 is already addressed in 5.1. Editorial change “or” to “and” as written in regulation

2.3 *Other Documents:*

CAMI Infant Dummy, Mark II ~~Newborn Dummy~~ (see Fig. 1)

CPSC Staff Rationale: “Newborn Dummy” is Fig. 2, which is different from the Infant Dummy.

6.4.1 A restraint system may be provided to secure a child in any of the manufacturer's recommended use positions in the infant inclined ~~infant inclined~~ sleep product.

CPSC Staff Rationale: Eliminate duplication of words.

7.1.2 Securely locate the ~~infant inclined sleep~~ product so that is the product cannot move during the performance of the following tests:

CPSC Staff Rationale: All products covered by this standard are to be tested, not just "infant inclined sleep" products.

7.1.4.1 Attach a force gage to the component cap, sleeve, or plug by means of any suitable device. For protective components that cannot be ~~reasonable~~ reasonably expected to be grasped between thumb and forefinger, or teeth on their outer diameter but have a gap of 0.040 in. (1.0 mm) or more behind the rear surface of the component and the structural member of the ~~infant inclined sleep~~ product to which they are attached, a clamp such as the one shown in Fig. 8 may be a suitable device.

CPSC Staff Rationale: All products covered by this standard are to be tested, not just "infant inclined sleep" products.

7.2.1.1 *Test Equipment* – shot bag, 6 to 8 in. (15 to 20 cm) diameter bag filled with a ~~lead shot~~ substitute; total weight 18 lb (~~41.4~~ 8.2 kg).

CPSC Staff Rationale: Provide more specific guidance on what should be in the shot bag. Correction of conversion from lb to kg.

7.2.2.2 By any necessary means, place a static load of 50 lb (~~34.4~~ 22.7 kg) ...

CPSC Staff Rationale: Correction of conversion from lb to kg.

7.3.1.2 CAMI Newborn Dummy (7.5 lbs, 3.4 kg) (see 2.3 and Fig. ~~42~~).

CPSC Staff Rationale: Indicate correct Figure for reference.

7.3.2.3 Place the CAMI Dummy Mark II in the product sleeping surface...

CPSC Staff Comment: The stability tests say the test equipment is the CAMI Newborn Dummy, however, the actual procedure says to use the CAMI Dummy Mark II. Please clarify which size dummy is to be used for this testing.

7.4.1.2 Place a CAMI Infants dummy, Mark II,

CPSC Staff Rationale: Editorial correction

7.4.2 Products designed with a single action release mechanism latching or locking devices – With the product in the manufacturer’s recommended use position, gradually apply a force of 10 lbs (45N) ~~force~~ over 5 s to release the mechanism in the direction most likely to fail and maintain for 10 s.



CPSC Staff Rationale: The word “force” already was used in this sentence.

7.9.2.1 Place the hinged weight gage – newborn (fig. 5) in the product in the manufacturer’s highest angle of incline position and position the gage with the hinge aligned ~~with~~ over the seat bight.

CPSC Staff Rationale: Editorial correction.

7.9.2.2; Apply a 60 inch-lbs. (metric 7.79 Nm) of torque to ~~the location~~ on the upper plate...

CPSC Staff Rationale: Added metric measurement and clarification is needed to identify “the location”.

8.3.1 In the warning statements, the safety alert symbol   and the word **WARNING** shall precede the warning

CPSC Staff Rationale: The safety triangle is missing

APPENDIX X1 RATIONALE X1.1 Subsection 6.5.2 & 6.11 – Rationale for 0-3 month old Newborn Bassinet Accessory for Inclined Infant Sleep Product The risk of an infant, who is 0–3 months old, falling from the infant inclined sleep product, ... The ability of the infant to roll out of the seat ~~of~~ is very restricted due to **0–3 month-old**

infants' limited mobility. ~~motion that the 0-3-month-old infant has.~~

CPSC Staff Rationale: Reworded for more accurate explanation.

Thank you for your consideration of these comments.

Sincerely,

Celestine T. Kish
Project Manager, Infant Inclined Sleep Products
CPSIA Section 104 Rulemaking

cc: Len Morrissey, ASTM F15 Staff Manager
100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

Colin Church, CPSC Voluntary Standards Coordinator