



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
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TRANSMITTED VIA EMAIL

Gary M. Bell  
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Technical Contact ASTM F2598  
ASTM International  
100 Barr Harbor Dr.  
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**Re:** Comment on ASTM Ballot F15.42 (17-04) Item 4, Reapproval with Editorial Changes to F2598-09 *Standard Consumer Safety Specification for Clothing Storage Chests* WK58641

Dear Mr. Bell,

Staff of the U.S. Consumer Product Safety Commission has evaluated incidents of clothing storage chests being used as toy storage chests. CPSC staff became involved after receiving incident reports of clothing storage chests used for toy storage closing unexpectedly and entrapping children.

CPSC staff<sup>1</sup> recommends revising sections 3.1.3, 5.1.3 and 5.1.5 of ASTM F2598-09 to increase the opening and closing cycles of clothing storage chests from 3500 cycles to 7000 cycles, as indicated below:

3.1.3 The chest lid shall comply with this requirement before and after being subjected to ~~3500~~ 7000 opening and closing cycles, as described in Section 5.

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<sup>1</sup> The views in this letter are those of the staff and have not been reviewed or approved by, and may not reflect the views of, the Commission.

5.1.3 Subject the lid to ~~3500~~ 7000 opening and closing cycles. One cycle consists of raising the lid from its fully closed position to a fully open position and returning it to fully closed.

5.1.5 Complete one cycle in approximately 10 to 15 s. Complete the ~~3500~~ 7000 cycles, then repeat the test described in [5.1.2](#).

As specified below, section 4.41.1.2 of ASTM F 963-16 *Consumer Safety Specification for Toy Safety* and the federal regulation at 16 C.F.R. part 1250, require toy chest lids to be cycled 7000 times before testing the lid support mechanism:

4.41.1.2 The toy chest lid shall comply with this requirement before and after being subjected to 7000 opening and closing cycles, in accordance with [8.27.1.2](#).

Increasing the hinge/lid opening and closing cycles of clothing storage chests will harmonize the requirements for clothing storage chests with the ASTM and federal requirements for toy chests. CPSC has received incident reports indicating that clothing chests are being used for storage of toys. Staff believes that clothing chests, commonly referred to as “cedar chests,” present the same entrapment, suffocation, and lid collapse hazards as toy chests. For this reason, CPSC staff recommends increasing the number of opening and closing cycles for a clothing storage chest to 7000 cycles to match the opening and closing cycles required for toy chests. This should result in a clothing chest lid/hinge system that is equally protective as a toy chest lid/hinge system.

Thank you for considering these comments.

Sincerely,

Thomas E. Caton, General Engineer  
U. S. Consumer Product Safety Commission  
Division of Mechanical and Combustion Engineering

cc: Len Morrissey, ASTM F15 Staff Manager  
Patricia Edwards, CPSC Voluntary Standards Coordinator