



United States
CONSUMER PRODUCT SAFETY COMMISSION
4330 East West Highway
Bethesda, MD 20814

MEMORANDUM

DATE: JUL 12 2010

TO : The Commission
Todd Stevenson, Secretary

THROUGH: Cheryl A. Falvey, General Counsel *CAF*
Philip L. Chao, Assistant General Counsel *PLC*

FROM : Patricia M. Pollitzer, Attorney, OGC *PM*

SUBJECT: Draft Notice of Proposed Rulemaking (“NPR”) for Full-Size and Non-Full Size Cribs under Section 104(b) of the Consumer Product Safety Improvement Act; Revised Draft NPR

Attached is a revised draft notice of proposed rulemaking (“NPR”) for full-size and non-full-size cribs: a redline version showing changes and a clean version. The draft includes the following revisions/corrections:

Throughout the document:

Editorial changes (made formatting and terminology consistent; corrected typos)

Full-size crib standard text:

1. Revised the name of the ASTM F 1169-10 standard due to change in name in the final ASTM standard.
2. Changed designation of ASTM standard’s provision concerning re-tightening of screws (p. 60 of revised draft NPR) due to change in the final ASTM standard.

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Non-full size crib standard text:

1. Added provision (pp.63-64 of revised draft NPR) for section 6.10.2.3 concerning pass/fail criteria for crib side impact test because it was omitted from previous draft NPR.
2. Changed numbers and wording for section 8.6.2.5 (p. 68 of revised draft NPR) to reflect corrections in staff memo.
3. Deleted figure A, renamed other figures, and replaced reference to figure A in 8.6.2.1 with reference to figure A1.12 which is now in final ASTM standard.
4. Deleted figure F and replaced reference to that figure with reference to figure A1.19 which is now in final ASTM standard.
5. In order to exclude provisions which relate only to play yards, added provisions stating not to comply with sections:
 - 5.16.2
 - 8.11 through 8.11.2.4
 - 8.12 through 8.12.2.2
 - 8.14 through 8.14.2
 - 8.15 through 8.15.3.3
 - 8.16 through 8.16.3
 - 9.3.2 through 9.3.2.4
6. Deleted provisions that were to become 8.28.2 through 8.28.2.2 because these provisions are now in the final ASTM standard.