

**SUBJECT:** ASTM F15 Juvenile Products Subcommittee Meetings

**DATE OF MEETINGS:** October 15-18, 2018

**LOCATION:** ASTM Headquarters, West Conshohocken, PA

**CPSC ATTENDEE(S):** Hope Nesteruk (ESME), Celestine Kish (ESHF), Suad Wanna-Nakamura (HSPP), and others attended for specific meetings or via telephone

**NON-CPSC ATTENDEE(S):** Contact ASTM for attendance list

**SUMMARY OF MEETINGS:**

### ***Monday October 15, 2018***

**F15.18 Toddler Beds**, additional CPSC attendees: None

Old business: The subcommittee discussed clarification/revision to the wording for the mattress support and side rail attachment. The clarification is to show that the testing is not for quality control and therefore doesn't need to test every corner attachment point. The testing is intended to cover any/all different types of attachments. This will be sent to ballot.

New business: Scope change to include mini crib that converts to toddler bed and use of "non-full size crib mattresses" as currently required in standard. A new task group was formed to work on this for next meeting; CPSC staff on task group.

**F15.18 Full-Size Cribs**, additional CPSC attendees: None

There was one outstanding ballot, F15 (18-09), with two items:

- Item 8: addressing add-on accessories, such as changing table accessories. The ballot received one negative regarding some of the terminology used in the ballot item. The subcommittee found the negative persuasive, and the item was withdrawn. A new task group was formed to address the concerns; Hope Nesteruk will be a member of the task group.
- Item 9: One editorial change will be made before publication.

Because the chair was not in attendance, a substitute filled in leading the meeting and anticipated publication dates were not discussed.

**F15.18 Bedside Sleepers**, additional CPSC attendees: None

The only business was that the standard is up for its 5-year review and renewal. A new task group was formed to undertake the review of the standard. Hope Nesteruk will be a member of the task group.

**F15.18 Bassinets**, additional CPSC attendees: Jill Jenkins (phone) & Dan Dunlap (phone)

Ballot results from four items on ballot F15 (18-09) where discussed:

- Item 10: This ballot item was to address compact bassinets, including definitions, stability, side height, and other aspects. The ballot received two negatives, which were discussed at length. The item was withdrawn and the task group will consider the voters' concerns as they rework the proposal.
- Item 11: This ballot item addressed lid requirements for cardboard bassinets. There were six negative votes. The item was withdrawn and the task group will consider the voters' concerns as they rework the proposal.
- Item 12: This item addressed warning requirements for compact bassinets. There were two negative votes. The item was withdrawn and the task group will consider the voters' concerns as they rework the proposal.
- Item 13: This item addressed force requirements for single action folding requirements. There were no negatives, but one comment. The subcommittee agreed to address the comment with a note.

New business: There was a short discussion regarding the examples shown in Figure 7, which demonstrates the setup for the bassinet stability requirements. The figure only shows bassinets that rock side-to-side, although the test requirements apply to head-to-toe rocking also. The task group addressing stability requirements will take up the issue.

**F15.18 Play Yards/NFS Cribs**, additional CPSC attendees: Steve Harsanyi (phone), Max Sanborn (phone), Jill Jenkins (phone)

Ballots: Ballot F15 (18-09) contained two items, both clarifications regarding toehold requirements (item 6) and mattress vertical displacement (item 7). Both items passed, but will be held with administrative negatives until the subcommittee is ready to publish.

Task group reports:

- Fit and Thickness: The task group reported that they had evaluated potential entrapment scenarios and come up with two potential performance tests regarding the fit of play yard mattresses. The task group is considering the methods and intends to meet in November to make a decision on a path forward. Once type of test method is decided. The group will work to refine the test method so that any probes or test apparatus are defined for the target population.

- Ad Hoc Warnings for Play Yards: The task group reported the proposal was almost ready for ballot, but is awaiting the ad hoc committee's decision regarding the SIDS warning. The task group expects to send the proposal to ballot after an additional review.

**F15.66 Crib Mattresses**, additional CPSC attendees: Steve Harsanyi (phone), Max Sanborn (phone), Jill Jenkins (phone)

The subcommittee chair reported that a new version of the standard has been published.

Task group reports:

- Cyclic testing: The task group reported that they had considered two potential cyclic tests for mattress integrity. One is based on the crib impact test, the other a rolling test based on the rolling test for adult mattresses. After discussions, the subcommittee recommended focusing on the impact test.
- Mattress firmness: The task group reported that they had considered a firmness test, but decided against pursuing due to the lack of incidents that clearly correlate a documented incident to a "soft" mattress.
- Standard language improvements: The group discussed changing the title of the standard from "crib mattresses" to "infant mattresses" because the standard is now covering full-size crib, non-full-size crib, and aftermarket play yard mattresses.
- Non-segmented mattresses: The task group reported that the task group is moving along with a proposal, but anticipates at least one more task group meeting.

New Business:

- Thin/flexible mattresses: There are several incidents that report a mattress that can be compressed by sheets to the point that a potentially hazardous gap is formed. The subcommittee tabled the issue, rationalizing that this was a sheet issue, not a mattress issue.
- Rolled/Boxed mattresses: Some mattresses are shipped directly the consumer rolled up and vacuum sealed in a box. The task group will consider these mattresses, especially the time needed to fully expand, as it considers other changes to the standard.

***Tuesday October 16, 2018***

**F15.16 Gates/Enclosures**, additional CPSC attendees: Jill Hurley (phone), Carlos Torres (phone), Lawrence Mella (phone), Jill Jenkins (phone), Keysha Walker (phone)

The subcommittee chair opened the meeting and began discussion of ballot results for ballot F15 (18-09) Item 4, which included:

- (1) raising the minimum average push-out force for all gates from 10 pounds to 30 pounds and allow for the use of wall-cups to meet this requirement; and
- (2) warning label language (in regards to the installation and use of wall cups).

The ballot received one negative, which involved the requirement around marking/labeling of hardware kits. The voter asked for a definition of “kit” because “kit” could be misinterpreted to not apply for those products that do not have a “kit” per se, but only the wall cups or mounting hardware in a bag or box. In addition, he recommended that both instructions and warning should accompany the mounting hardware packaging, instead of instructions “or” warning. In addition, the ballot received other comments, including one from CPSC staff requested that the label be placed along the top rail, and comments from others regarding terminology (e.g., “properly” vs “correctly”). During discussions, CPSC staff reminded the subcommittee that the visual indicators task group had been tabled pending work on the push-out force task group, and reminded the subcommittee of the technical staff position that visual side-pressure indicators should be incorporated into pressure-mounted gates that do not require wall cups/mounting hardware to meet the push-out requirement. Due to the discussions regarding the ballot results, the item was withdrawn and will go back to task group for further work.

Because the ballot was the only substantive item on the agenda, the subcommittee began to work to address some of the comments and gain consensus on potential revisions to the ballot during the meeting, focused on the relatively minor issues (e.g., changing the name of the test to “horizontal push-out test” and using the same name consistently). However, the task group will be meeting to finalize the proposal. The task group intends to work quickly to address the concerns, rebalot before the end of the calendar year, and meet as a subcommittee (likely via conference call) in January.

CPSC staff reported that the notice of proposed rulemaking for Gates and Enclosures is scheduled for FY19. Health Canada staff responded to a question about their Gate regulation, indicating they are aware it is out-of-date and it is in sight for revision; however, there is no anticipated timeline.

**F15.18 Infant Incline Sleep Products**, additional CPSC attendees on phone: Lawrence Mella, Keysha Walker, Zach Foster, Howard Tarnoff, Mark Kumagai, Rana Balci-Sinha, and Jill Jenkins.

A separate meeting log for this meeting has been filed.

**F15.18 Changing Products**, additional CPSC attendees: Jill Jenkins (phone), Keysha Walker (phone)

The chair reported that there were no outstanding ballots or old business. New business included several proposed clarification ballots, including:

- Clarifying that scissoring and shearing requirements apply only to areas accessible to the child. After discussions, the subcommittee decided to leave as-is.
- Moving figure Y (which demonstrates “left alignment” of warnings) to the appendix.
- Aligning the text shown in figure 12 with the text in section 9.5.1 (“stay within arm’s reach of child” instead of “stay in arm’s reach of your child”). Although the warnings are written as “shall address” statement, the subcommittee agreed to align the figure with the requirement.
- Changing the text under the example figured from “sample label” to “example warning.”
- Adding lines around the signal panel in Figure 17.

The items that are not editorial will go to ballot (except bullet 1).

**F15.20 Bath Tubs**, additional CPSC attendees: Dan Dunlap (phone)

CPSC staff reported to the subcommittee that the Commission voted on 10/15/18 – 5-0 to accept F2670-18 as the new standard for reference in the Federal Regulation. The effective date is Jan 15, 2019.

**F15.20 Bath Seats**, additional CPSC attendees: Dan Dunlap (phone)

The chair reported that all 18 ballots are approved. He will remove the administrative holds and will submit to ASTM. Anticipate a November or December approval.

**F15.68 Baby Monitors**, additional CPSC attendees: Zach Foster (phone), Keysha Walker (phone)

The chair reported that the previous ballot, F15(18-06) Item 5 on battery safety, was approved and published as F2951-18 section 5.7.

Results of ballot F15(18-09) Item 16, regarding cord accessibility, were discussed. One negative was found persuasive and the item was withdrawn for further task group review. The persuasive negative suggested divided requirements into two parts, one for completely covered cords and the other for cords with some accessibility. Additional discussions involved the use of the free, stretched cord length requirement versus a head probe and the errant phrase "shall remain inaccessible," which should not have been included in the ballot. The task group will continue work.

**F15.19 Infant Bedding**, additional CPSC attendees: Tim Smith (phone), Keysha Walker (phone)

The subcommittee discussed the results of ballot F15 (18-09) Item 14, which was intended to add a definition for "crib liner" to the F1917 standard, with an understanding that all references to and requirements for crib bumpers in the standard would eventually be changed to apply to crib liners. One negative was found persuasive, primarily because the proposed definition could not be adopted until after an additional ballot is issued that changed all references to crib bumpers to "crib liner." Some subcommittee members also expressed concern about having a "crib liner" definition that covered any product intended to be against the interior surface of the crib side and end panels. The subcommittee concluded that the definition should go back to the task group, who should consider these points and revise the ballot.

The subcommittee then discussed new business, which included a proposed revision to CPSC staff's earlier (April 2018) recommended revision to the standard related to bumper attachment. A new task group was formed to address this issue; Tim Smith is on the task group.

**F15.59 Children's Chairs**, additional CPSC attendees: Vince Amodeo (phone), Keysha Walker (phone)

The subcommittee chair discussed proposed wording developed by the scissoring task group to clarify the testing requirements for addressing pinching, shearing, and crushing injuries from folding chairs. The proposed wording was presented and discussed, but no decision was made on the way forward. The task group membership was stated and a few new members were added. The task group plans to continue work on the proposal.

## ***Wednesday October 17, 2018***

### **F15.20 Bathers**, additional CPSC attendees: None

The chair reported on the outstanding ballots. The ballots related to scope and stability were found persuasive so they will go back to the task group for more work. The negative related to introduction statement was found non-persuasive, so a ballot will be issued to uphold.

New Business: The subcommittee discussed the need to look at definitions and/or the scope of the standard to address products that do not “stand alone” but hang off a full-size tub or a sink. A task group formed with CSPC staff joining.

### **F15.18 Infant Rockers**, additional CPSC attendees: None

The chair reported that a note was missing from an outstanding ballot item. The note allows rockers with carry handles to be exempted from the warning label about never lift, so that has to be reballoted. The standard is also being updating with Ad Hoc language. In addition, a task group was formed to add battery requirements to the standard. CPSC staff is on task group.

### **F15.21 Infant Swings**, additional CPSC attendees on phone: Keysha Walker

The chair reported on outstanding ballot status. The subcommittee decided to combine the Fall and Strangulation messages since the bullets under both were similar. A question was raised about the “not safe for sleep” warning on a cradle/bassinet swing. The chair is going to speak with the chair for bassinets and will report back to the subcommittee. The strangulation ballot needs to be clarified and will go back out for vote. Under new business a battery ad hoc language task group was formed. CPSC staff is on the task group.

### **F15 Ad Hoc Language**, additional CPSC attendees: Tim Smith (phone), Jill Hurley (phone)

The subcommittee discussed the results of ballot F15 (18-09) Item 2, which included: (1) recommended language for how to cite reference documents within an ASTM standard, (2) the task group’s rationale for why it was not including recommended language for latching and locking mechanisms, (3) a proposed revision to the recommended Back-to-Sleep

warning, and (4) new recommended language for battery-operated product markings and instructions. One negative related to the Back-to-Sleep warning was found persuasive, and resulted in minor revisions to the language (*e.g.*, changing “babies” to “baby,” adding “Always” at the beginning, reversing the order of “suffocation” and “SIDS”). This item will be re-balloted. Subcommittee members also agreed to editorial changes to the battery-operated product requirements. One comment questioned whether a specific warning should be included for button-cell batteries. The subcommittee agreed that one should and asked the task group to take this up as new business the next time it meets.

The subcommittee also discussed new business, which included a proposal for the Ad Hoc Language recommendations document to address the introduction section for juvenile product standards; the subcommittee discussed and revised the draft proposal for introductory language. Other new business included a discussion about a statement in the Ad Hoc Language recommendations document that the product must comply with the applicable requirements of the CPSIA, and possible revisions to address test lab concerns about assessing compliance with this particular requirement.

**F15.16 Infant Floor Seats**, additional CPSC attendees: Lawrence Mella (phone), Keysha Walker (phone), Dan Dunlap (phone)

One item was balloted since the last meeting, which revised the figure for the hinge weight used in testing. There was one minor editorial comment regarding the proper punctuation for metric references, which will be updated before publication. The occupant retention task group reported that they were working, but did not have any things ready for subcommittee review. CPSC staff provided incident data, which included 3 new incidents.

**F15.21 Hand Held Carriers**, additional CPSC attendees: None

Old business/Task group reports:

- Falls from shopping carts: The task group shared an example pictogram and the subcommittee made several suggestions. The chair will make the modification and send to ballot.
- Handle strength: The chair presented the results of the task group work, which would add static and dynamic tests for non-rigid, non-rotating handles. The proposal was discussed, and the task group will continue to work on the proposal.
- Incident data: The chair described the recent incident data, which the task group will review at an upcoming meeting.
- Suffocation warning: The group discussed the suffocation warning. The chair will make the few changes suggested and send to a newly formed task group to address warning.



New business:

- **Warnings:** A new task group was formed to address the ad hoc formatting requirements for warning, along with other warning issues, such as the suffocation warning above. CPSC staff is on the task group.

**F15.21 Soft Infant Carriers**, additional CPSC attendees: Keysha Walker (phone), Max Sanborn (phone)

There were no outstanding ballots.

Task group reports:

- **Round robin testing:** Several test labs had participated in round robin testing to address the unbounded leg opening test for back and hip carry position. Work will continue.
- **Flammability:** The task group chair reported that the original reason for forming the task group had been a misunderstanding of the intent of the referenced tests and suggested adding clarification language. The subcommittee discussed the test methods and felt the task group should continue work.

New business:

- **Fastener strength:** A new task group was formed to look into expanding the fastener test to addresses the whole system of a fastener and its attachment to the carrier.

**F15.21 Sling Carriers**, additional CPSC attendees: Keysha Walker (phone), Max Sanborn (phone)

Task group reports:

- **Multi-Occupant Slings/Dynamic test method:** The task group reported that they had been working a proposal to address comments and negatives from the previous ballots for multi-occupant slings. The proposal would limit slings to two children, with the appropriate test methods to test both occupant areas statically and dynamically. The task group will continue work, but expects to be ready to ballot in the near future.
- **Baby wearing apparel:** The task group chair showed several pictures of baby wearing apparel, and one manufacturer was in attendance with an example. The subcommittee discussed the products, whether they fall into the scope of

the sling standard as written, and whether the scope was intended to cover these products. Discussion will continue in task group.

New business:

- A new task group was formed to consider incorporating the ad hoc formatting requirements into the sling carrier standard. CPSC staff is on the task group.

## ***Thursday October 18, 2018***

**F15.16 High Chairs**, additional CPSC attendees: Stefanie Marques (in person), John Murphy (phone)

One ballot which proposes to exempt reclined seat high chair products intended for infants who are unable to sit upright unassisted and under 20 pounds from the stability requirements was discussed; the ballot received four negative votes:

The first negative vote discussed was submitted because the voter thought that the exemption should have a time limit. The chair and the subcommittee agreed that a time limit was a good idea, but it would not be appropriate to have a time limit written in a new standard. However, the chair offered that the subcommittee would be reminded of a time limit by making a note of the time limit in the agenda and the minutes. The chair suggested an 18 month time limit which would give the reclined seat task group until April 2020 to develop stability requirements appropriate for reclined seat high chair products. One subcommittee member voiced concern that this was too long of a time frame and after some discussion the subcommittee agreed to a one year time limit with a deadline of October 2019. Since the time limit issue was resolved the negative vote was withdrawn.

The second negative vote discussed was submitted because the voter thought it was unclear what products were being exempted from the stability requirements. The chair offered to send a new ballot with a note that clarifies that products that have positions in addition to the reclined position were still required to be tested to the stability requirements. There was some subcommittee discussion on whether the note of clarification was necessary, but ultimately the subcommittee agreed to ballot the clarification. Since the clarification issue was resolved the negative vote was withdrawn.

The third negative vote that was discussed was submitted because the voter was not in favor of not stating specifically in the standard that "reclined" products are exempt. The voter and proposed added to the exemption high chairs and high chair accessories "with a fixed or adjustable reclined seatback". The chair stated that he had discussed the voters'

concerns and explained that it was best to define the exempted products by intended weight and developmental milestone, because it would be challenging to define what angle was considered recline. Based on the discussion with the chair prior to the meeting the negative vote was withdrawn.

The fourth negative vote that was discussed was submitted because the voter had several wording and word order changes to the ballot. These changes were discussed and were considered editorial changes, and therefore this negative was also withdrawn.

Since the negatives were withdrawn and/or resolved the ballot passed.

The chair then requested that subcommittee members who are testing the reclined seat products in accordance the test methods suggested by Stokke in their letter from 3/31/17, to submit feedback/results of their testing by 12/15/18. CPSC staff offered to have the reclined seat task group visit the CPSC lab and observe our testing of reclined seat products.

**F15 Ad Hoc Scope**, additional CPSC attendees: Stefanie Marques (in person)

The “ad hoc scope chart,” which contains photos of products and indicates consensus as to if they fall into or out of a particular standard, has been balloted, and results were discussed. Several changes were made to the examples, including moving products into the inclined sleep scope, and making sure it is clear that photos that show an infant sleeping in a product should not be used for sleep products. Tricycle/stroller combination products were also discussed, since they are now evolving and often includes modes where the child *isn't* providing power. The group asked for a new data pull in spring to evaluate.

Old Business:

- Travel tents (for sleep): Reviewed several redacted IDIs provided by CPSC. A task group was formed to review incidents and consider developing a standard. CPSC staff is on the task group.
- Reclined infant seats that don't bounce or rock: There was little data on these products, and the group agreed to table the issue.

**F15.17 Walkers**, additional CPSC attendees: Ben Mordecai (phone), Keysha Walker (phone)

A revised standard (F977-18) was published containing minor clarifications that do not affect test requirements. Therefore, chair will hold notification under PL 112-18 until after

the next round of revisions. The next revision is expected to shall contain more substantive changes. The task group evaluating the standard for general improvements and clarifications reported that they had begun work, with a goal of having ballots to present to the task group at the April meeting.

**F15.16 Hook On Chairs**, additional CPSC attendees: Keysha Walker (phone)

The chair reported that there were no ballots or old business. During new business, the chair reported that a revised standard for hook-on chairs, F1235-18, was published and CPSC was notified under PL 112-28. The Commission voted 4-0 to allow the revision to be referenced by 16 CFR 1233 effective January 15, 2019.

**F15.17 Strollers**, additional CPSC attendees: Kristen Talcott (phone), Rana Balci-Sinha (phone), Carlos Torres (phone), Brian Baker (phone), Keysha Walker (phone), Dan Dunlap (phone)

Task group reports:

- Jogger wheel detachment: – The task group is exploring adding a dynamic test for wheel detachment. They plan to collect data using the EN1888 Rolling Road test fixture and are currently developing the test plan.
- Baby car seat combination: The task group has not met yet. CPSC staff was added to the task group.
- Test weight: The task group is working on adding a more quantitative method to determine what constitutes failure to support the test weight in Note 5. The task group chair asked the subcommittee for input on what a failure means; discussion included whether ripping is considered a failure, whether a change in use position is considered a hazard, and the impact of a change in use position on subsequent testing. The task group will explore these discussion items.
- Parking brake: The task group is looking at defining accessibility using an articulating arm based on the EN cycle trailer standard, but still needs to work on details of the arm such as linkage lengths. The subcommittee discussed dual brake systems; there is disagreement about whether standard should allow independent single release systems, which the task group will discuss further.

The approved ballot on a test method for tray/grab bar covers (18-02) is expected to be published in the near future. The chair reported he will ask ASTM to send a notification under PL 112-28 after publication. The subcommittee also discussed new business, which

included an interest in updated incident data and a discussion about the weights used in the stability test.

**F15.17 Stationary Activity Centers**, additional CPSC attendees: Kevin Lee (in person)

The chair reported that there were no outstanding ballots or old business.

New business included:

- To address CPSC staff's previous letter to ASTM regarding the frayed strap which included a proposed wording, the subcommittee chair proposed additional testing of SAC which would be a dynamic life testing of the full product. In this test, a 25 pound weight is lowered in the seat. Then the weight is raised until there is no spring deflection. Then the weight is dropped. There will be a 5 second wait period before it is repeated 120,000 times.
- Based on this test, there was discussion about reducing the number of cycles by increasing the load weight. In addition, some members suggested removing the word frayed from CPSC staff's recommended wording as fraying is subjective and not easy to quantify. One member suggested performing the dynamic life test followed by a pull force which would test a potentially suspect straps strength.
- CPSC staff informed ASTM that final rule is schedule for June 2019 if the frayed strap issue can be balloted by December 2018.
- There was discussion about looking into toy related hazards which involve entanglement between multiple toys on the activity tray.