



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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July 16, 2020

TRANSMITTED VIA EMAIL

Richard Rosati
ASTM Subcommittee Chair for ASTM Infant Inclined Sleep Products
100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

Re: ASTM F15.18 Infant Inclined Sleep Products

Dear Mr. Rosati:

On November 12, 2019, the U.S. Consumer Product Safety Commission (CPSC) published a supplemental notice of proposed rulemaking (SNPR) for infant sleep products. This SNPR proposed incorporating by reference, ASTM F3118-17a, *Standard Consumer Safety Specification for Infant Inclined Sleep Products*, with modifications to address safe sleep for infants, including limiting the seat back angle to less than 10 degrees, and requiring that all products marketed for infant sleep meet requirements of an existing infant sleep product standard: bassinets/cradles, cribs, play yards, and/or bedside sleepers. Staff believes that a similarly scoped voluntary standard would provide greater clarity for both the industry and caregivers, explicitly requiring that sleep products meet one of a delineated set of standards. To date, however, neither the subcommittee, nor any task group, has met to discuss the SNPR, or the proposed modifications to F3118-17a. Therefore, staff¹ is writing to reiterate our position that these are important issues for the safety of infant sleep products, and staff is ready to discuss the proposed modifications with the ASTM subcommittee.

CPSC staff plans to submit a final rule (FR) briefing package to the Commission under Section 104 of the Consumer Product Safety Improvement Act (CPSIA) on infant sleep products in fiscal year 2021. CPSC staff would like to work with the ASTM subcommittee members to address safe sleep modifications to F3118-17a, and we request that the subcommittee meet in the immediate future, rather than wait for staff to complete work on the final rule briefing package.

¹ 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.

Thank you for your consideration of this issue.

Sincerely,

Celestine T. Kish

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CPSIA Section 104 Rulemaking

CC: Molly Lynyak, Manager, Technical Committee Operations
Meredith Birkhead, Juvenile Products Manufacturers Association (JPMA)
Patricia Edwards, CPSC Voluntary Standards Coordinator
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