



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
5 RESEARCH PLACE, ROCKVILLE, MD 20850

Celestine T. Kish  
Division of Human Factors

CKish@cpsc.gov

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**TRANSMITTED VIA EMAIL**

Tony Paolo  
Subcommittee Chairman for ASTM In-bed Sleepers  
ASTM International  
100 Barr Harbor Dr.  
West Conshohocken, PA 19428-2959

Re: ASTM In-Bed Sleeper Standard

Dear Mr. Paolo:

I am writing to correct a misinterpretation of my December 11, 2019 letter to the subcommittee chairmen of the Bassinet and Infant Inclined Sleep Products.<sup>1</sup> In my letter, I expressed U.S. Consumer Product Safety Commission (CPSC) staff's concerns with including compact bassinets and in-bed sleepers in the bassinet standard.<sup>2</sup>

In the letter I stated:

Staff has concerns about the safety of in-bed sleepers because they have the potential for instability as well as the inability to prevent an adult from rolling onto the infant. Both of these potential scenarios can lead to positional asphyxiation or suffocation for the infant... Therefore, staff believes that in-bed sleepers and compact bassinets should not be included in the bassinet/cradle standard, meaning that any infant sleep product should meet one of the four sleep product standards (bassinets/cradles, cribs, play yards, and bedside sleepers).

At the In-bed Sleeper task group meeting on May 11, 2020, you indicated that CPSC staff did not agree with in-bed sleepers being included in the bassinet standard and that a separate in-bed

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<sup>1</sup> Letter to ASTM Bassinet\_IISP\_12-12-2019 - <https://www.regulations.gov/document?D=CPSC-2017-0020-0016>

<sup>2</sup> 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.

sleeper standard was necessary. We would like to be clear that based on our evaluation of incident data related to in-bed sleepers, we have great concerns regarding the safety of in-bed sleepers and the feasibility of developing any safety standard that fully addresses potential hazards. Based on the 12 deaths discussed with the In-bed Sleeper Data Task Group members, CPSC staff cannot foresee how these products can be designed and regulated to ensure safe use for infants. Staff is not confident that an in-bed sleeper voluntary standard that differs from the current bassinet standard will result in a safe sleep product. Although we understand task group members' stated desire to create a "safer" sleep space to meet market needs, we question the path of developing a safety standard without the scientific data to support the safety of in-bed sleepers or the medical community agreeing that such a standard can provide for a safe sleep environment.

Sincerely,

Celestine T. Kish  
Project Manager for Infant Sleep Products

cc: Molly Lnyak, Manager, Technical Committee Operations  
Meredith Birkhead, Juvenile Products Manufacturers Association (JPMA)  
Patricia Edwards, CPSC Voluntary Standards Coordinator  
Hope Nesteruk, Children's Program Area Manager