



October 11, 2024

Lisa Trofe
ASTM Subcommittee Chair for F15.11 Bed Rails
Antonio Fernandes
ASTM Subcommittee Co-Chair for F15.11 Bed Rails
ASTM International
100 Barr Harbor Drive
West Conshohocken, PA 19428

Dear Ms. Trofe and Mr. Fernandes:

The CPSC¹ has received one report of an incident where a two-year-old child pulled the excess strap of a portable bed rail from under the mattress and wrapped it around her neck without injury,² and another report where a toddler of unknown age was found at night with the excess strap wrapped around his neck without injury.³ Consumers are typically instructed to stow excess strap beneath the bed, but these incidents demonstrate that the instructions do not prevent the strangulation hazard. The CPSC has also received one report of a death in California in November 2022 involving a 15-month-old child who died of accidental hanging from the entire length of an uninstalled bed rail strap that was not secured under the bed.⁴ The bed rail was being used on the top bunk of a bunk bed.

To address the strangulation hazard posed by excess strap on children's portable bed rails, CPSC staff recommends that ASTM revise ASTM F2085, *Standard Consumer Safety Specification for Portable Bed Rails*, to implement performance requirements that reduce the length of excess strap on portable bed rails that use a strap retention system – see Figure 1. Excess strap is the free end of the retention strap after the bed rail is tightened against the mattress. A static



Figure 1: Excess strap on a portable bed rail.

¹ 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.

² IDI 230815CCC1038.

³ Manufacturer/retailer report.

⁴ IDI 230628CBB3803.

strap length of greater than 8 inches is sufficient to strangle a child age 6 months or older, because the neck circumference of a fifth percentile 6- to 9-month-old child is 8 inches.⁵ ANSI/WCMA A100.1-2022, *Standard for Safety of Window Covering Products*, addresses a potential strangulation hazard posed by cords on window covering products by limiting free hanging cords to a length equal to or less than 8 inches.

ASTM F406, *Standard Consumer Safety Specification for Non-Full-Size Baby Cribs/Play Yards*, addresses a similar hazard for infants by limiting cord/strap length to 7.4 inches, and includes a test method to measure the cord/strap length: using a 3/4-inch diameter clamping surface, gradually apply a 5-lbf force, then measure the cord length while the force is applied. Staff recommends implementing a similar test method to measure the excess strap of a strap retention system.

Staff appreciates the work of the ASTM F15.11 Bed Rails subcommittee to improve the safety of children's bed rails, and we look forward to working together to address the strangulation hazard posed by excess straps. If you have any questions, please contact me at dtaxier@cpsc.gov, or (301) 987-2211.

Sincerely,

Daniel Taxier

Daniel Taxier
Children's Program Manager

CC: Molly Lynyak, ASTM F15 Staff Manager
Donald Mays, ASTM F15 Chair
Jacqueline Campbell, CPSC Voluntary Standards Coordinator

⁵ BSI (1990) as cited in Norris, B., & Wilson, J. R. (1995). CHILDATA: The handbook of child measurements and capabilities –Data for design safety. London: Department of Trade and Industry.