



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 East West Highway, Bethesda MD 20814

January 4, 2017

TRANSMITTED VIA EMAIL

Mr. Joel Taft
Subcommittee Chairman for ASTM Infant Bouncers
ASTM
100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

Re: ASTM F15.21 Infant Bouncers

Dear Mr. Taft:

We are writing to convey U.S. Consumer Product Safety Commission (CPSC, Commission) staff's¹ support of the work you, past subcommittee chair Mike Steinwachs, and the subcommittee have achieved in revising the voluntary standard F2167-16, *Standard Consumer Safety Specification for Infant Bouncers*. As specified in the letter sent by Celestine Kish to Mike Steinwachs on November 22, 2016 (see Appendix), staff supports the balloted changes intended to align the warning design in bouncer seats with the Ad Hoc Task Group recommendations. We urge the subcommittee to publish a standard expeditiously that incorporates Ad Hoc Task group recommendations. However, to improve the effectiveness of warning labels, staff suggests several clarifications to the standard, in the areas of warning label placement and wording.

Staff still has concerns about placement of the fall hazard warning, based on incident data demonstrating skull fractures when bouncers are placed on an elevated surface and the infant falls from or along with a bouncer. Staff suggests a modification to the visibility test in section 7.11.3, which would increase space for the fall hazard warning label to accommodate industry concerns and address staff's concern that the label be placed close to the infant's head to be effective. Subcommittee members were concerned that for some products, the area adjacent to the child's head was insufficient to accommodate the necessary warning labels. Staff's research on the seat back space, including models with narrow seat backs, did not corroborate the commenters' concerns. Nevertheless, to enhance test repeatability and to increase allowable space for warning labels, staff suggests that the visibility test procedure for the fall hazard warning label be revised to require placement of the label above an imaginary horizontal line that crosses through the junctions of the under arm and side of the torso (armpits), on both the

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.

left and the right, and not be obscured by any part of the CAMI dummy. Locating the fall hazard warning at or around the shoulder height or above is noticeable to a caregiver when placing the child into the bouncer seat. In addition, this placement provides additional seat back space near the infant's head for placement of the warning label. Moreover, this visibility test procedure using the CAMI dummy remains objective and repeatable. Staff's recommended changes to the standard are as follows:

7.11.3.1 *Visibility With CAMI Dummy Restrained in Seat*— While standing in front of the product with the Newborn CAMI dummy installed, verify that the required warnings are visible and placed above an imaginary horizontal line that crosses through the junctions of under arm and side of the torso (armpits) on both left and right and not obscured by any part of the dummy (Figure 10).

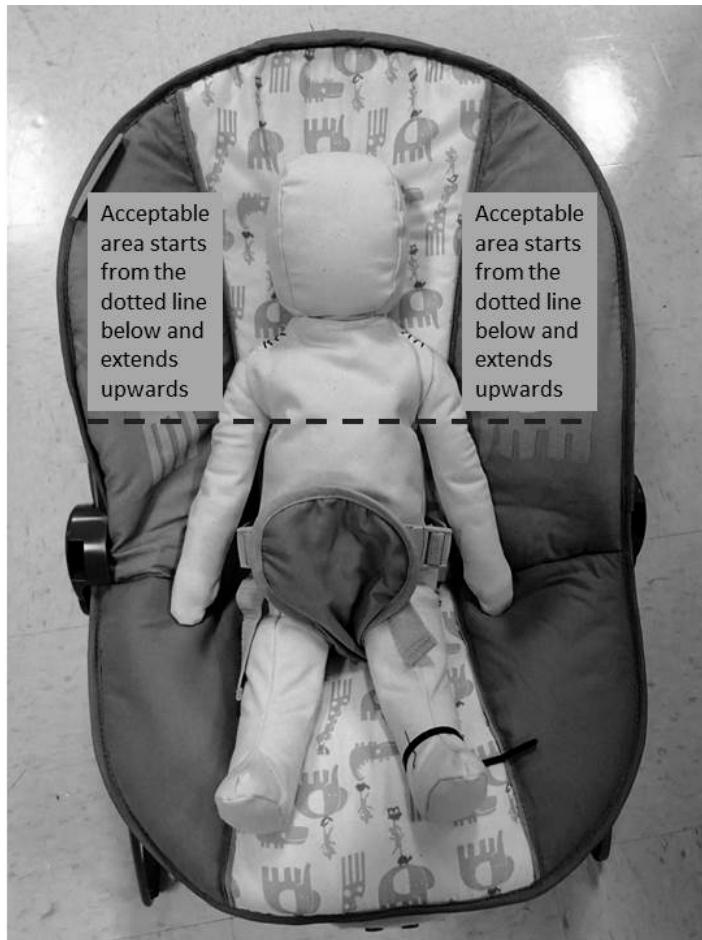


Fig 10. Allowable area for warning label placement starts from the dotted line that crosses the junctions of underarm and both sides of the torso.

Staff's second suggestion is to revise the warning label language, based on the Ad Hoc Wording Task Group's most recent update. The Ad Hoc Task Group now recommends that the wording "Never leave child unattended, even if child falls asleep" be used "for products likely to be used for infants who are sleeping (*i.e.*, bouncers, swings, infant rockers, hand held carriers) that are not intended for periods of unattended sleep." The Ad Hoc Task Group's wording should be

aligned with the text in the fall and suffocation hazard warning labels for bouncers. Staff suggests the following revisions in the wording of the standard:

For fall hazard warning label: Always use restraints. Adjust to fit snugly, even if baby falls asleep.

For suffocation hazard warning label: Never leave baby unattended or loosen restraints, even if baby falls asleep.

Thank you for your consideration and staff looks forward to continuing to work with the subcommittee towards a stronger voluntary standard.

Sincerely,



Suad Wanna-Nakamura

Rana Balci-Sinha, Ph.D.
Human Factors Engineer
Infant Bouncer Seats Project

Suad Wanna-Nakamura, Ph.D.
Infant Bouncer Seats Project Manager

cc: Len Morrissey, ASTM F15 Staff Manager
Patricia Edwards, CPSC Voluntary Standards Coordinator

Appendix



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 East West Highway, Bethesda MD 20814

November 22, 2016

TRANSMITTED VIA EMAIL

Mike Steinwachs
Subcommittee Chairman for ASTM Infant Bouncers
ASTM
100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

Re: ASTM F15.21 Infant Bouncers

Dear Mr. Steinwachs:

I am writing to convey U.S. Consumer Product Safety Commission (CPSC, Commission) staff's¹ support of the work you and the subcommittee have achieved in revising the voluntary standard for F2167-16, *Standard Consumer Safety Specification for Infant Bouncers*. Staff is providing the following comment in response to ballot F15000001016018, issued on November 3, 2016, with a closing date of December 5, 2016.

Staff agrees with the subcommittee's balloted changes, but we would like to offer one editorial change. In Line Blank between 42 and 43, "Warning statements in instructional literature shall meet the format requirements specified in 8.4.4, 8.4.5 and 8.4.6 with the following two exceptions: (a) ~~the background of the Signal Word panel need not be in~~ meet the color requirements and (b) clause 6.4. of ANSI Z535.4 need not be applied." The intent was to allow manufacturers to have more flexibility with the colors used in the signal word panel for the warnings in the instructional literature. However, staff believes that manufacturers could misinterpret the reference to the *background* of the signal word panel as meaning that certain color combinations that affect the text color, such as white lettering on a black background, would not be permitted.

Thank you for your consideration of these comments.

Sincerely,

Celestine T. Kish
Celestine T. Kish
Project Manager
CPSIA Section 104 Rulemaking

cc: Len Morrissey, ASTM F15 Staff Manager
Patricia Edwards, CPSC Voluntary Standards Coordinator

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.