



Ballot Vote Sheet

TO: The Commission
Alberta E. Mills, Secretary

DATE: June 5, 2024

THROUGH: Jessica L. Rich, General Counsel
Austin C. Schlick, Executive Director

FROM: Daniel R. Vice, Assistant General Counsel, Regulatory Affairs
Mary A. House, Attorney, Regulatory Affairs

SUBJECT: Notice of Proposed Rulemaking: Safety Standard for Bassinets and Cradles;
Draft *Federal Notice* Regarding Extension of Comment Period

BALLOT VOTE DUE Tuesday, June 11, 2024

On May 22, 2024, Lisa Trofe, Executive Director of the Juvenile Products Manufacturers Association (JPMA), on behalf of their members and the ten companies that co-signed the request, submitted a request for 90-day extension of the comment period for the Notice of Proposed Rulemaking: Safety Standard for Bassinets and Cradles (NPR). JPMA asserts that the 60-day comment period is insufficient for stakeholders to provide meaningful feedback on the NPR proposals, alleging the industry needs additional time to: (1) prototype and evaluate new product designs to comment on feasibility of the proposals; (2) test and evaluate the proposed side-to-side zero-degree tilt angle, plus or minus one degree, including the required equipment; and (3) test and evaluate the proposed side wall rigidity requirement. Commission staff's June 5, 2024, Briefing Memorandum assesses the JPMA request for an additional 90 days to comment and advises that a 45-day comment period extension provides industry and other stakeholders sufficient time to submit comments on the feasibility of the NPR proposals. The Debt Ceiling Level program in the Fiscal Year 2024 Operating Plan does not provide for a final rule revising the bassinets and cradle standard; this item was deferred for lack of funding. Accordingly, the recommended 45-day extension would not affect any deadline set by the Commission.

The Office of the General Counsel is providing for Commission consideration the attached draft *Federal Register* notice that summarizes JPMA's request, provides staff's analysis of the request, and extends the comment period by 45 days, until August 1, 2024.

Please indicate your vote on the following options:

- I. Approve publication of the attached document in the *Federal Register*, as drafted.

(Signature)

(Date)

U.S. Consumer Product
Safety Commission
4330 East-West Highway
Bethesda, MD 20814

National Product Testing
and Evaluation Center
5 Research Place
Rockville, MD 20850

II. Approve publication of the attached document in the *Federal Register*, with the specified changes:

(Signature)

(Date)

III. Do not approve publication of the attached document in the *Federal Register*.

(Signature)

(Date)

IV. Take other action specified below:

(Signature)

(Date)

Attachment: Notice of Proposed Rulemaking: Safety Standard for Bassinets and Cradles; Draft *Federal Register* Notice Regarding Extension of Comment Period

CONSUMER PRODUCT SAFETY COMMISSION

16 CFR Part 1218

[CPSC Docket No. CPSC-2010-0028]

Safety Standard for Bassinets and Cradles; Notice of Comment Period Extension

AGENCY: Consumer Product Safety Commission.

ACTION: Extension of comment period.

SUMMARY: On April 16, 2024, the Consumer Product Safety Commission (CPSC) published in the *Federal Register* a notice of proposed rulemaking (NPR) to amend the existing regulation for bassinets and cradles, to ensure that the rule addresses identified hazards and that these sleep products for young infants provide the highest level of safety feasible. The NPR invited the public to submit written comments during a 60-day comment period, beginning on the NPR publication date, and ending on June 17, 2024. In response to a request for a 90-day extension of the comment period, the Commission is extending the comment period for this NPR by 45 days.

DATES: Submit comments by August 1, 2024.

ADDRESSES: Comments related to the Paperwork Reduction Act aspects of the marking, labeling, and instructional literature requirements of the NPR should be directed to the Office of Information and Regulatory Affairs, the Office of Management and Budget, Attn: CPSC Desk Officer, FAX: 202-395-6974, or e-mailed to: oir_submission@omb.eop.gov.

Submit all other comments, identified by Docket No. CPSC-2010-0028, by any of the following methods:

Electronic Submissions: Submit electronic comments to the Federal eRulemaking Portal at: <https://www.regulations.gov>. Follow the instructions for submitting comments. CPSC typically does not accept comments submitted by e-mail, except through www.regulations.gov.

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CPSC encourages you to submit electronic comments by using the Federal eRulemaking Portal, as described above.

Mail/Hand Delivery/Courier/Confidential Written Submissions: Submit comments by mail, hand delivery, or courier to: Office of the Secretary, Consumer Product Safety Commission, 4330 East-West Highway, Bethesda, MD 20814; (301) 504-7479. If you wish to submit confidential business information, trade secret information, or other sensitive or protected information that you do not want to be available to the public, you may submit such comments by mail, hand delivery, or courier, or you may e-mail them to: cpsc-os@cpsc.gov.

Instructions: All submissions must include the agency name and docket number. CPSC may post all comments without change, including any personal identifiers, contact information, or other personal information provided, to <https://www.regulations.gov>. Do not submit through this website: Confidential business information, trade secret information, or other sensitive or protected information that you do not want to be available to the public. If you wish to submit such information, please submit it according to the instructions for mail/hand delivery/courier/confidential written submissions.

Docket: For access to the docket to read background documents or comments received, go to: <https://www.regulations.gov>, and insert the docket number, CPSC-2010-0028, into the “Search” box, and follow the prompts.

FOR FURTHER INFORMATION CONTACT: Celestine T. Kish, Project Manager, Division of Human Factors, Directorate for Engineering Sciences, Consumer Product Safety Commission, 5 Research Place, Rockville, MD 20850; 301-987-2547; ckish@cpsc.gov.

SUPPLEMENTARY INFORMATION:

A. Background

Pursuant to section 104(b)(1) of the Consumer Product Safety Improvement Act of 2008 (CPSIA; 15 U.S.C. 2056a(b)(1)), the Commission promulgated the current mandatory standard for bassinets and cradles (bassinets/cradles) in October 2013. 78 FR 63019 (Oct. 23, 2013); *see Safety Standard for Bassinets and Cradles*, codified at 16 CFR part 1218 (part 1218). Part 1218 incorporates by reference the 2013 version of the bassinets/cradles voluntary standard, ASTM F2194 – 13, *Standard Consumer Safety Specification for Bassinets and Cradles* (ASTM F2194 – 13), with modifications to make the standard more stringent, to further reduce the risk of injury associated with bassinets/cradles.¹

Section 104(b)(2) of the CPSIA requires that after the Commission issues mandatory safety standards for durable infant or toddler products, the Commission shall periodically review and revise the standards to ensure that such standards provide the highest level of safety for such products that is feasible. 15 U.S.C. 2056a(b)(2). Accordingly, on April 16, 2024, the Commission published an NPR in the *Federal Register* proposing to amend part 1218 to address the hazards identified in the NPR and to ensure that the mandatory bassinet/cradle regulation provides the highest level of safety feasible.² 89 FR 27246. The proposed modifications to part 1218 would remove a product category – compact bassinets – and address five identified hazard patterns associated with young infants. The NPR proposed to incorporate by reference ASTM F2194 – 22^{e1}, with modifications to further reduce the risk of injury associated with bassinets,

¹ After issuing the mandatory standard in 2013, ASTM International (ASTM) published several revisions to ASTM F2194, including ASTM F2194 – 2013a, -2016, and -2016^{e1}. ASTM did not notify CPSC of these revisions, so the mandatory rule has not been updated since 2013. However, ASTM F2194 – 2016^{e1} is substantially the same as the existing mandatory rule for bassinets/cradles codified in part 1218. 86 FR 33022, 33034-35 (June 3, 2021).

² On March 20, 2024, the Commission voted (4-0) to publish the NPR, available at: <https://www.cpsc.gov/s3fs-public/Commission-Meeting-Minutes-NPR-Safety-Standard-for-Bassinets-and-Cradles.pdf?VersionId=GwpmKZ4S9sRrEiBmDFaEWn1fBre6eZ2r>.

and to provide the highest level of safety that is feasible for such products. 89 FR 27246, 27247.

The 60-day comment period closes on June 17, 2024.³

B. Request for Comment Period Extension

On May 22, 2024, Lisa Trofe, Executive Director of the Juvenile Products Manufacturers Association (JPMA), on behalf of JPMA's members and ten companies that individually co-signed the request, submitted a request for a 90-day extension of the NPR comment period (JPMA request).⁴ The JPMA request asserts that the 60-day comment period is insufficient, providing three primary reasons for additional time to provide comments: (1) prototyping and evaluating new product designs to “understand if the proposed requirements are feasible, and what new hazards, if any, such designs could create”; (2) testing to evaluate the proposed side-to-side “zero-degree tilt angle, plus or minus one degree,” including the proper equipment needed for repeatable measurements and considering the tilt angle requirement which they allege “does not consider the stacked tolerances of building construction and laboratory floors or consumer floors” and how this may impact the test results; and (3) evaluating the availability of equipment needed to test the proposed side wall rigidity requirement.

³ Staff provided a February 28, 2024, Memorandum, Staff's Draft Proposed Rule to Revise the Safety Standard for Bassinets and Cradles in support of the NPR, which is available at: <https://www.cpsc.gov/s3fs-public/Briefing-Package-Draft-Notice-of-Proposed-Rulemaking-Safety-Standard-for-Bassinets-and-Cradles.pdf?VersionId=l37iJVSjn32WnUTBDV27L6c37uJC4Iis>. The NPR contains an overview of staff's assessment and analysis, and the Commission's basis for issuing the NPR, which is based on the 2022 Bassinet Rejection Staff Briefing Package. Based on the information and analysis in the NPR and related staff packages, the Commission preliminarily determined that the proposed requirements are more stringent than the requirements in ASTM F2194 – 22^{e1}, would further reduce the risk of injury associated with products within the scope of the NPR, and would provide the highest level of safety that is feasible for such products. The Commission specifically sought comment on the feasibility of each proposed requirement, including technical feasibility.

⁴ JMPA's request has been placed on the docket for this rulemaking, as well as attached as to Staff's June 5, 2024, Briefing Memorandum: Proposed Rule to Amend the Safety Standard for Bassinets and Cradles; Request to Extend Comment Period (Staff Briefing Memo), available at: [\[insert link\]](#).

C. Assessment of the JPMA Request

The testing equipment identified in the NPR is the same equipment currently identified in the ASTM standard and CPSC's regulation,^{5,6} and therefore, stakeholders do not require additional time to test and evaluate equipment. Moreover, based on CPSC staff's experience testing sample bassinets/cradles to the NPR proposals, testing should not require more than 10 business days to test up to 15 product samples; an *additional* 90 days, totaling 5 months (60 days plus 90 days), is unnecessary to assess products to the NPR requirements and provide feedback. However, we agree with JPMA that prototype design, evaluation, and testing to the zero-degree side-to-side tilt angle, plus or minus one degree, and other proposed requirements may require additional time. Assessing how to modify products to feasibly meet the proposed modifications, identifying any new potential hazards, and providing comments on these assessments may benefit from more than the 60 days provided in the NPR. Providing additional time in the comment period will allow manufacturers to produce prototypes that are closer to the final design specifications and that will more accurately reflect what a manufacturer finds to be achievable.

D. Conclusion

The Commission has considered the JPMA request to extend the comment period and staff's assessment of the request. Currently, the comment period is due to close on June 17, 2024. To provide sufficient time for stakeholders to prototype and evaluate new designs, and to

⁵ ASTM F2194-22^{e1} specifies in section 4.6 that angle measurements shall be taken using a digital inclinometer with a 0.1° minimum resolution for angle measurements. However, section 7.8 specifies the use of a digital inclinometer with a 0.5° minimum resolution. Users of the standard should use the more precise instrumentation to ensure they are following all applicable sections of the standard.

⁶ It is common and a known test setup for lab floors to be 0 +/- 0.5 degrees. This is already addressed in ASTM F2194-22^{e1}, see section 7.10 Rock/Swing Angle Tests. Additionally, the test requires to ZERO out the inclinometer on that test surface (floor) before starting the test to minimize any influence of the floor on the bassinet angle measurements.

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assess and provide comment on the NPR proposals, especially as it relates to specific products, the Commission will grant a 45-day extension of the comment period, until August 1, 2024.

Alberta E. Mills,
Secretary, Consumer Product Safety Commission



Memorandum

TO: The Commission
Alberta E. Mills, Secretary

DATE: June 5, 2024

THROUGH: Jessica L. Rich, General Counsel
Austin C. Schlick, Executive Director
DeWane Ray, Deputy Executive Director of Operations

FROM: Duane E. Boniface, Assistant Executive Director,
Office of Hazard Identification and Reduction

Celestine T. Kish, Bassinet and Cradle Project Manager, Division of Human
Factors, Directorate for Engineering Sciences

SUBJECT: Proposed Rule to Amend the Safety Standard for Bassinets and Cradles; Request to
Extend Comment Period

On April 16, 2024, the Commission (CPSC or Commission) published a notice of proposed rulemaking (NPR) to amend the Safety Standard for Bassinets and Cradles, 16 C.F.R. part 1218, and requested public comments for 60 days, closing June 17, 2024. 89 Fed. Reg. 27,251. The NPR proposes to incorporate by reference ASTM F2194-22^{e,1} *Standard Consumer Safety Specification for Bassinets and Cradles*, with modifications to make the standard more stringent to address identified hazards, and to provide the highest level of safety feasible for these products. 15 U.S.C. 2056a(b)(2).

The NPR proposes to update the incorporation by reference from the 2013 version to the 2022 version of the ASTM voluntary standard, ASTM F2194-22^{e1}, with the following modifications and additions to reduce the risk of asphyxia, suffocation, falls, skull fractures, and burns:

- Remove all references to “compact” bassinets, eliminating a primary concern about less safe designs that led to CPSC’s 2022 rejection;
- Clarify the “bassinet” definition by moving the 10-degree sleep surface angle statement into an actual performance requirement with specific testing requirements;
- Refer to CPSC’s regulation instead of a voluntary standard for multi-use products to ensure that bassinets comply with the current regulatory requirements;
- Include performance requirements and associated test methods for:
 - Discouraging product use on unsafe surfaces to address the associated tipover and fall hazards;
 - External side/rail height provides easier access to the infant when the bassinet is on the floor, thus reducing the likelihood of the product being placed on an elevated surface;
 - Height of occupant sleep surface from the floor provides easier access to the infant when the bassinet is on the floor, thus reducing the likelihood of the product being placed on an elevated surface;
 - Sidewall rigidity to prevent deformation/collapse if an external force is applied such as sibling pulling on the side;

Proposed Rule to Amend the Safety Standard for Bassinets and Cradles; Request to Extend Comment
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- Mattresses and mattress supports:
 - Sleep surface deflection/firmness requirements to reduce the likelihood of the mattress conforming to the face and causing suffocation;
 - Structural integrity requirements to reduce the likelihood of the infant getting into a compromised position and suffocating;
- After-market mattress requirements to ensure after-market mattresses provide the same level of safety as those provided by the original equipment manufacturer;
- Sleep surface angles:
 - Head-to-toe incline angle to require a flat, sleep surface;
 - Side-to-side tilt restrictions to reduce the likelihood of the infant rolling over into a compromised situation and suffocating;
- Electrical system requirements;
- Warning and instructional literature to adopt elements of ASTM F2194-22^{e1} that staff found improved safety.

Pursuant to section 603 of the Regulatory Flexibility Act (RFA, 5 U.S.C. §603), the Commission prepared an Initial Regulatory Flexibility Analysis (IRFA) that assesses that this proposed rule would have a significant economic impact on a substantial number of small U.S. entities, primarily from redesign costs in the first year that the final rule would be effective. 89 Fed. Reg. 27,251, 27,267-75.

On May 22, 2024, the Juvenile Products Manufacturers Association (JPMA), along with several companies and consultants, requested an extension of the comment period for a minimum of 90 days, until September 15, 2024. (JPMA request, attached as Exhibit A). According to the request, stakeholders state they require additional time "...to provide meaningful, scientific feedback- especially when one considers the particularly challenging requirements that the proposed rule includes."

The JPMA request provides three reasons for their request for additional time to comment on the NPR: (1) prototyping and evaluating new product designs to "understand if the proposed requirements are feasible, and what new hazards, if any, such designs could create;" (2) testing to evaluate the proposed side-to-side "zero-degree tilt angle, plus or minus one degree," including the proper equipment needed for repeatable measurements and considering the tilt angle requirement which they allege "does not consider the stacked tolerances of building construction and laboratory floors or consumer floors" and how this may impact the test results; and (3) evaluating lack of specified equipment to test the proposed side wall rigidity requirement, which allegedly makes it difficult for stakeholders to understand and test to this requirement.

The testing equipment identified in the NPR is the same equipment currently identified in the ASTM standard and CPSC's regulation,^{1,2} and therefore, staff does not agree that stakeholders require additional time to test and evaluate equipment. Moreover, based on staff's experience testing sample bassinets/cribs to the NPR proposals, testing should not require more than 10 business days to test

¹ ASTM F2194-22^{e1} specifies in section 4.6 that angle measurements shall be taken using a digital inclinometer with a 0.1° minimum resolution for angle measurements. However, section 7.8 specifies the use of a digital inclinometer with a 0.5° minimum resolution. Users of the standard should use the more precise instrumentation to ensure they are following all applicable sections of the standard.

² It is common and a known test setup for lab floors to be 0 +/- 0.5 degrees. This is already addressed in ASTM F2194-22^{e1}, see section 7.10 Rock/Swing Angle Tests. Additionally, the test requires the tester to ZERO out the inclinometer on that test surface (floor) before starting the test to minimize any influence of the floor on the bassinet angle measurements.

up to 15 product samples; an *additional* 90 days, totaling 5 months (60 days plus 90 days), is unnecessary to assess products to the NPR requirements and provide feedback.

However, staff acknowledges that prototype designing and evaluation and testing to the proposed zero-degree side-to-side tilt angle, plus or minus one degree, and other proposed requirements, may require additional time for design and evaluation. Staff recognizes assessing how to modify products to feasibly meet the proposed modifications, assessing new potential hazards that could be associated with new designs, and providing comments on these assessments may benefit from more than the 60 days provided in the NPR. Testing to the proposed requirements will provide rapid results, but is unlikely to reflect necessary specifications on dimensions, transportability, or aesthetics for the final product. Providing additional time in the comment period will allow manufacturers to produce prototypes that are closer to the final design specifications and that will more accurately reflect what a manufacturer finds to be achievable.

Based on the iterative process of prototype testing described above, staff recommends extending the comment period by 45 days (for a total of 105 days), which staff believes will provide stakeholders sufficient time to assess the NPR proposals, especially as it relates to their specific proposals moving the comment period closing date to August 1, 2024. The FY 2024 Operating Plan does not provide for staff delivery of a final rule briefing package in this matter during the current fiscal year.

Attachments:

JPMA Request for Comment Period Extension

JPMA Request for Comment specified time



May 22, 2024

Alberta Mills
Office of the Secretary
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814

Re: Request for Extension of Comment Period for Notice of Proposed Rulemaking: Safety Standard for Bassinets and Cradles

Submitted Electronically

Dear Chair Hoehn-Saric:

The Juvenile Products Manufacturers Association (JPMA), on behalf of our members and the undersigned companies, is writing to you today to respectfully request an extension of the comment period allotted for the Notice of Proposed Rulemaking: Safety Standard for Bassinets and Cradles, set to close on June 17.

The Juvenile Products Manufacturers Association is a national not-for-profit trade organization representing 95% of the prenatal to preschool industry including the producers, importers, or distributors of a broad range of childcare articles that provides protection to infants and assistance to their caregivers. JPMA collaborates with government officials, consumer groups, and industry leaders on programs to educate consumers on the safe selection and use of juvenile products.

JPMA, our member companies, and CPSC staff have often worked together via the ASTM process to develop standards and rules that make products safer and better for parents and their babies. In fact, JPMA and many of our members are currently in West Conshohocken at ASTM Headquarters attending the F.15 Juvenile Products Subcommittee Meetings, going through the process of developing standards and working together with the other stakeholders present, including consumers and CPSC staff, to make children's products safer. During the discussion in the Bassinet Subcommittee, it became clear that the comment period allotted for this proposed rule is just not enough time for stakeholders to provide meaningful, scientific feedback – especially when one considers the particularly challenging requirements that the proposed rule includes.

Prototyping

The time involved to review the incident data, perform laboratory testing, and set up prototyping and experimentation will unavoidably exceed the 60-day comment period. The

JUVENILE PRODUCTS MANUFACTURERS ASSOCIATION, INC.

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TEL: 856.638.0420 • FAX: 856.439.0525

jpma@jpma.org • www.jpma.org

proposed rule stipulates new types of designs, not currently in market, will need to meet the new requirements. Therefore, prototyping is necessary to understand if the proposed requirements are feasible, and what new hazards, if any, such designs could create. The current comment period is not enough time to fully complete this prototyping, and therefore stakeholders cannot comment on new hazards that may appear.

Zero-Degree, Plus or Minus One Degree, Tilt Angle Requirement

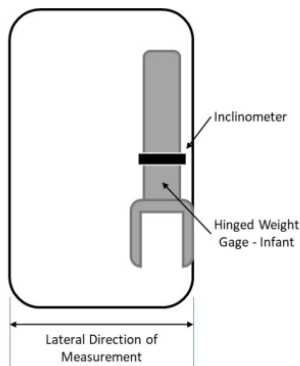
The “zero-degree tilt angle, plus or minus one degree” requirement in this proposed rule is of particular concern. Testing successfully to this requirement is hardly feasible and includes a great deal of variability in results. We plan to outline the issue with this requirement in greater detail in our comments submitted to the docket on the Federal Register, but the fact that it is extremely difficult to successfully test to this requirement warrants an extension of the comment period.

Specifically, the proposed rule does not point out the proper equipment needed to take a repeatable measurement. For example, the diagram included in the proposed rule (see below) demonstrates the position of the inclinometer which is allowed to hang off the hinged gauge. However, most inclinometers must have all feet in contact with the surface. Hence, this proposal would lead to inconsistent measurements unless a different type of inclinometer is prescribed, making it unknown if the requirement is even feasible because it is not repeatable.¹ This requirement, crucially, also does not consider the stacked tolerances of building construction and laboratory floors or consumer floors, or if the test should be conducted on a standardized table to exactly 0.0 degrees as a starting point, or not. Thus, the testing for this requirement at this juncture is hardly feasible, if at all. An extension of the comment period is necessary in order to give stakeholders a chance to provide scientific feedback on these requirements.

(vi) 7.15.1.4 Place the inclinometer on the center of the Upper Plate of the Infant Hinged

Weight Gauge and record the lateral angle (figure 4 to this paragraph (b)(26)(vi)).

Figure 4 to paragraph (b)(26)(vi) – Weighted, lateral angle measurement



¹ [89 FR 27282](#)

Side Wall Rigidity

The proposed rule does not prescribe the proper equipment needed to take the side wall rigidity measurement. The rule requires that, “the side wall being tested during the stability test (section 7.4) shall not deflect in any direction more than 0.5 inches,” but does not stipulate the equipment that will be needed to take a precise measurement of deflection in any direction to less than 0.5 inches.² Therefore, more time is needed for stakeholders to understand the proper equipment that can be used to test these requirements precisely.

JPMA, its members, and the undersigned are eager to work with CPSC and all stakeholders in making children’s products as safe as possible, as evidenced by our attendance at and commitment to the standards development process at ASTM. This rule includes requirements that necessitate much more time than currently allotted to test and gather meaningful, scientific, and data-driven feedback.

JPMA and our members will always prioritize the safety and well-being of infants, toddlers, and their parents. We appreciate your consideration of this matter and look forward to remaining engaged as leaders in ensuring the safe design, manufacture, and use of juvenile products.

Respectfully,

Lisa Trofe, JPMA Executive Director
Baby Delight
Baby Trend, Inc.
Best Practice Quality LLC
Chicco USA
Deca Consulting, Inc.
Delta Children
Dorel Juvenile Group
Graco Children’s Products Inc.
Nuna Baby Essentials
UPPAbaby

² [89 FR 27278](#)

From: [Kish, Celestine](#)
To: [Kish, Celestine](#)
Subject: FW: Request for Extension of Bassinet NPR Comment Period
Date: Tuesday, May 28, 2024 10:19:31 AM

From: Sean McLaughlin <smclaughlin@jpma.org>
Sent: Thursday, May 23, 2024 2:53 PM
To: Mills, Alberta E. <AMills@cpsc.gov>
Cc: Hoehn-Saric, Alexander <AHoehnsaric@cpsc.gov>; Lisa Trofe <ltrofe@jpma.org>; Rick Locker <fblocker@lockerlaw.com>
Subject: Re: Request for Extension of Bassinet NPR Comment Period

For clarity, JPMA and the signees of the above request are seeking a 90-day minimum extension. Thank you.

Regards,

Sean McLaughlin

Government Affairs Associate
Juvenile Products Manufacturers Association
1120 Rt. 73, Suite 200
Mt. Laurel, NJ 08054
smclaughlin@jpma.org
tel: (856) 793-0906

On Wed, May 22, 2024 at 9:10 AM Sean McLaughlin <smclaughlin@jpma.org> wrote:

Good morning, Secretary Mills -

Please see attached for a request, signed by JPMA and several member companies who are participating at the ASTM F.15 Juvenile Products subcommittee at ASTM Headquarters in West Conshohocken, PA this week, for an extension of the current

comment period for the Bassinet and Cradle proposed rule. This request comes at the direction of CPSC staff, also present at these meetings, who informed us that this is the correct course of action to take in seeking an extension.

Please let me know if you have any questions. Thank you for your time.

Regards,

Sean McLaughlin

Government Affairs Associate

Juvenile Products Manufacturers Association

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