TRANSMITTED VIA EMAIL

Don Huber July 24, 2020

ASTM Subcommittee Chair for ASTM Stationary Activity Centers

100 Barr Harbor Dr.

West Conshohocken, PA 19428-2959

Re: ASTM F15.17 Stationary Activity Centers

Dear Mr. Huber:

The U.S. Consumer Product Safety Commission (CPSC) published a final rule for stationary activity centers (SACs) on June 18, 2019.[[1]](#footnote-2) In this final rule, staff identified an issue with strap failure, caused when metal components on SACs come in contact with the straps. The Commission did not adopt an additional requirement to address this hazard because: “(1) The ASTM task group has made progress toward developing a requirement to address fraying straps; (2) CPSC is aware of only one product that involved this issue; and (3) the one product has been redesigned with parts that will not cause the strap to fray.”

On October 21, 2019, the SAC Strap Integrity Task Group stated that they planned to ballot new requirements; however, the task group has not met since then; nor have any new requirements been balloted. All meetings for F15 Juvenile products scheduled in April 2020 were canceled due to COVID-19.

Staff requests scheduling a virtual meeting with the task group to finalize requirements for a subsequent ballot vote. Because 9 months have passed since the decision to ballot requirements, staff believes it is important to schedule this meeting within the next 4 weeks, with the goal of balloting new requirements within 8 weeks.

If you have any questions, please feel free to contact me. Thank you for considering this issue.

Sincerely,

Kevin Lee

CC: Patricia L. Edwards, CPSC Voluntary Standards Coordinator

Meredith Birkhead, Juvenile Products Manufacturers Association (JPMA)

Molly Lynyak, ASTM International

1. These comments are those of CPSC staff, and have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission. [↑](#footnote-ref-2)