



February 20, 2025

TRANSMITTED VIA EMAIL

Jennifer King
ASTM F15.18 Subcommittee Chair
ASTM International
100 Bar Harbor Drive
West Conshohocken, PA 19428

Dear Ms. King:

CPSC staff¹ sent a letter on December 19, 2024, notifying ASTM of the Commission's acceptance of the revised voluntary standard for the *Safety Standard for Non-Full-Size Baby Cribs*, 16 C.F.R. part 1220, and the *Safety Standard for Play Yards*, 16 C.F.R. part 1221.² Those updated rules are now published in the *Federal Register*, and will be effective on April 5, 2025, unless the Commission receives a significant adverse comment.^{3,4} Part of the Commission's review process of the update included the publication of a Notice of Availability (NOA) in the *Federal Register* for the publication of the voluntary standard, ASTM F406-24, *Standard Consumer Safety Specification for Non-Full-Size Baby Cribs/Play Yards*, and a request for comment on whether adopting the revised voluntary standard would improve the safety of non-full-size cribs and/or play yards. 89 FR 85077.

The Commission received one comment on the NOA. The anonymous commenter sought to point out improvements that could be made to ASTM F406-24.⁵ For example, the commenter pointed out that section 8.26.3, *Detachment Test*, only specifies in what amount of time to gradually apply the force

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 The December 19, 2024 acceptance letter is available at: <https://www.cpsc.gov/s3fs-public/CPSC-Letter-Play-Yards-and-Non-Full-Size-Cribs-Rule-Update-Letter-to-ASTM%2024-12-19.pdf?VersionId=4oPhuZUv.ssqwygfO0HNoysORz8.ORea>.

³ The Safety Standard for Play Yards is available at: <https://www.federalregister.gov/documents/2025/01/29/2025-01658/safety-standard-for-play-yards>. A correction to the standard is available at: <https://www.federalregister.gov/documents/2025/02/14/2025-02602/safety-standard-for-play-yards-correction>.

⁴ The Safety Standard for Non-Full-Size Cribs is available at: <https://www.federalregister.gov/documents/2025/01/31/2025-01721/safety-standard-for-non-full-size-baby-cribs>. A correction to the standard is available at: <https://www.federalregister.gov/documents/2025/02/14/2025-02605/safety-standard-for-non-full-size-baby-cribs-correction>.

⁵ Comments on the NOA can be viewed at: <https://www.regulations.gov/docket/CPSC-2024-0034/comments> and the specific comment is posted at <https://www.regulations.gov/comment/CPSC-2024-0034-0002>.



and does not specify the duration of time the force is to be held. Similar tests in ASTM F406 and other juvenile product voluntary standards typically specify both requirements. For instance, section 8.27, *False Latch* (immediately following section 8.26), specifies application of the force within a period of five seconds and that it be maintained for an additional 30 seconds. Staff urges the subcommittee to review the entirety of the comment filed with CPSC and determine which points to address in ASTM F406.

Staff thanks the subcommittee for its continued efforts to improve the safety of consumer products and looks forward to working with the subcommittee to address these latest comments.

Sincerely,

Daniel Taxier

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cc:

Molly Lynyak – Staff Manager, ASTM Committee F15 on Consumer Products
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