



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

May 05, 2006

Mr. Thomas J. Lowery
Subcommittee Chairman, ASTM F15.42 on Furniture Safety
ASTM International
100 Barr Harbor Drive
West Conshohocken, PA 19428-2959

Dear Mr. Lowery:

The U.S. Consumer Product Safety Commission (CPSC) staff would like to take this opportunity to comment* on Work Item WK5626, Revision of ASTM F2057-00, *Standard Safety Specification for Chests, Door Chests, and Dressers*, and to clarify the CPSC staff position regarding the use of attachment hardware for furniture stability.

During the March 22, 2006 meeting of the Furniture Safety Subcommittee, CPSC staff comments on a 1999 ballot were provided to the Subcommittee. In those comments, CPSC staff did not support allowing furniture clothing units to be tested while attached to the wall, because this approach relied on consumer intervention to ensure stability. The staff highlighted potential reasons why consumers may not use wall attachments; those reasons are still valid. The CPSC staff believes that the furniture types covered in the F2057 standard should be stable when tested according to the standard (without wall attachments). However, the staff also believes that informing consumers of the potential tip-over hazard and providing additional hardware and labeling may encourage some consumers to take additional precautions.

The CPSC staff supports the proposed revision to include a wall attachment kit and safety message with each piece of furniture. We believe that providing consumers with a manufacturer-supplied device, hardware, and instructions to explain and assist them in locating the device for the safest attachment (e.g., to a wall stud) will increase a consumer's ability to effectively attach furniture to the wall. We support incorporating this change in the revision of ASTM F2057.

Sincerely,

A handwritten signature in black ink, appearing to read "Troy Whitfield".

Troy Whitfield

* The comments expressed in this letter are those of the CPSC staff and have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.