



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

February 10, 2014

Vesta Garcia
Subcommittee Chairman for ASTM F2549 Frame Child Carriers
ASTM
100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

Re: ASTM F2549-13

Dear Ms. Garcia:

This letter is a follow up to our phone call last month regarding the voluntary standard ASTM F2549-13, *Standard Consumer Safety Specification for Frame Child Carriers*. While preparing a briefing package for the Commission for CPSIA section 104 rulemaking for frame carriers, CPSC staff uncovered an issue regarding the performance requirement for retention systems (section 6.5 in the standard). The performance requirement specifies that a retention system shall be provided and attached to the product prior to shipment. The performance requirement also refers to a test method (7.5) but does not contain pass/fail criteria concerning the tests outlined in section 7.5.

Based on staff's experience with ASTM standards and how ASTM standards typically are written, staff believes that the absence of pass/fail criteria in the performance requirement is an oversight. In addition, we consulted with two testing laboratories and reviewed the standards below, which have similar test procedures and corresponding test requirements:

- EN 13209-1:2004, European/British Standard for *Child use and care articles- Baby carriers- Safety requirements and test methods- Part 1: Framed back carriers*;
- ASTM F404-13a, *Standard Consumer Safety Specification for High Chairs*; and
- ASTM F833-13b, *Standard Consumer Safety Performance Specification for Carriages and Strollers*.

After consulting with the laboratories and reviewing these standards, staff developed draft language for the missing performance requirement. Much of the added language is essentially the same as language found in the reviewed

standards. The draft language is included below (strikeout represents removed text, underline represents added text):

6.5 Retention System:

6.5.1 A retention system, including a shoulder restraint, shall be provided to secure the occupant in a seated position in any of the manufacturer's recommended use positions ~~when tested in accordance with 7.5.~~

6.5.2 Before shipment, the manufacturer shall attach the retention system in such a manner that it will not detach in normal usage.

6.5.3 If the retention system includes a crotch restraint designed to work with a lap belt, it shall be designed such that its use is mandatory when the retention system is in use.

6.5.4 When tested in accordance with 7.5, the restraint system and its closing means (for example, a buckle) shall not break, disengage or separate at any seam and all fasteners shall not release or suffer damage that impairs the operation and function of the restraint system. At the end of the tests, the CAMI dummy shall not be released fully or fall out of the carrier.

CPSC staff asks that this issue be added to the agenda for the next subcommittee meeting and that the matter be considered for ballot so that the standard can be revised accordingly.

Sincerely,

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CPSIA Section 104 Rulemaking

cc: Len Morrissey, ASTM F15 Staff Manager
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Colin Church, CPSC Voluntary Standards Coordinator