



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

February 6, 2017

Mr. Rick Rosati
F15.42 Standard Safety Specification for Clothing Storage Units
ASTM International
100 Barr Harbor Drive
West Conshohocken, PA 19428

Dear Mr. Rosati:

This letter provides U.S. Consumer Product Safety Commission staff's position regarding section 7 of ASTM F2057-14, *Safety Specification for Clothing Storage Units*, and how clothing storage units with multiple outstops on a single drawer guide should be tested.¹ Section 7.1.2 and 7.2.2 of ASTM F2057-14 do not specify a procedure for testing clothing storage units manufactured with multiple "outstops"² on a single drawer guide. Clarifying these provisions would address inconsistent testing of these clothing storage units.

CPSC staff believes that testing should reflect the likely use of products. Staff's opinion is based upon evaluation of clothing storage units with multiple "outstops." Product use indicates that consumers extend drawers or pull out shelves to the furthest "outstop" along the Operational Sliding Length of clothing storage units. Thus, CPSC staff recommends that Section 7 be clarified to reflect that the addition of multiple outstops to a drawer guide mechanism shall not be considered in the test methods of Sections 7.1 and 7.2 and other related sections using drawer openings. Rather, staff believes that the standard should state that testing conditions shall specify a fully extended drawer.

Sincerely,

Michael Taylor
Mechanical Engineer
Directorate of Laboratory Sciences

¹ These comments are those of CPSC staff, and they have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

² An "outstop" is defined in ASTM F2057-14 as "any feature that limits outward motion of drawers or pullout shelves, or both."

Mr. Rick Rosati

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5 Research Place
Rockville, MD 20850

Cc: Patricia L. Edwards, CPSC Voluntary Standards Coordinator