



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
5 Research Place, Rockville, MD 20850

December 12, 2019

TRANSMITTED VIA EMAIL

Scott Lewis  
Subcommittee Chairman for ASTM Bassinets and Cradles  
Richard Rosati  
Subcommittee Chairman for ASTM Infant Incline Sleep Product  
ASTM International  
100 Barr Harbor Dr.  
West Conshohocken, PA 19428-2959

Re: ASTM F15.18 Bassinet and Cradles and Infant Inclined Sleep Products Updates

Dear Mr. Lewis and Mr. Rosati:

U.S. Consumer Product Safety Commission (CPSC) staff<sup>1</sup> appreciates your willingness to work together to address the infant deaths in products with seatback angles greater than 10 degrees. Additionally, staff is aware that ASTM is considering updates to the ASTM F15.18 Bassinet and Cradles and Infant Inclined Sleep Products standards to address additional infant sleep products. Given the recently published Supplemental Notice of Proposed Rulemaking (SNPR) for Infant Sleep Products,<sup>2</sup> staff reviewed infant sleep products as a category of durable infant or toddler products under section 104(f) of the CPSIA and provides our “safe sleep” concerns regarding in-bed sleepers and compact bassinets that can potentially be used as in-bed sleepers.

The SNPR addresses products that provide infant sleeping accommodations that are not already covered by safety standards for bassinets/cradles, cribs (full-size and non-full size), play yards, and/or bedside sleepers. Under that proposal, sleep products that do not clearly fall into an existing sleep product category would be required to meet CPSC’s bassinet/cradle standard, including a requirement for a sleeping angle of 10 degrees or less. Staff considers bassinets/cradles, cribs, play yards, and bedside sleepers that meet their relevant standards to be safe sleep products because they provide a flat, firm, stable surface on which infants can sleep on their backs. In addition, these products provide infants their own sleeping space separate from parents’ bed.

Staff has concerns about the safety of in-bed sleepers because they have the potential for instability as well as the inability to prevent an adult from rolling onto the infant. Both of these potential scenarios can lead

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<sup>1</sup> The views or opinions expressed in this letter are solely those of the staff, and these views and opinions do not necessarily represent those of the Commission.

<sup>2</sup> <https://www.federalregister.gov/documents/2019/11/12/2019-23724/safety-standard-for-infant-sleep-products>

to positional asphyxiation or suffocation for the infant. Another concern of staff's is the safety of compact bassinets and baby boxes because, without a built-in stand, compact bassinets and baby boxes could be used as an in-bed sleeper with the potential for instability. Moreover, depending on the side height, these products might not prevent an adult from rolling onto the infant. Therefore, staff believes that in-bed sleepers and compact bassinets should not be included in the bassinet/cradle standard, meaning that any infant sleep product should meet one of the four sleep product standards (bassinets/cradles, cribs, play yards, and bedside sleepers).

Staff looks forward to working with you to ensure that: (1) the bassinet/cradle standard maintains requirements for safe sleep environments for infants, and (2) the infant inclined sleep products standard also provides for a safe sleep environment.

Sincerely,

Celestine Kish,  
Project Manager,  
Infant Inclined Sleep Products

cc: Molly Lynyak, Manager, Technical Committee Operations  
Patricia Edwards, CPSC Voluntary Standards Coordinator  
Hope Nesteruk, Children's Program Area Manager