



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

September 29, 2017

TRANSMITTED VIA EMAIL

Mike Steinwachs
Subcommittee Chairman for ASTM Infant Inclined Sleep Products
ASTM
100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

Re: ASTM F15 Ballot (17-07), item 9, Infant Inclined Sleep Products

Dear Mr. Steinwachs:

I am writing to convey U.S. Consumer Product Safety Commission (CPSC, Commission) staff's¹ continued support of the work you and the subcommittee have achieved in revising the voluntary standard for F3118, *Standard Consumer Safety Specification for Infant Inclined Sleep Products*. Staff would like to comment on Item 9 for Ballot F15 (17-07), regarding the Scope for Infant Inclined Sleep Products.

Currently, the scope in F3118-17 states:

*If the inclined sleep product can be converted into a product for which another ASTM standard consumer safety specification exists, the product shall meet the applicable requirements of that standard. For example an inclined sleep product that can have the recline angle adjusted below 10° shall **also** (emphasis added) comply with the applicable requirements of Consumer Safety Specification F2194.*

This statement indicates that the multiple-use product shall meet both the bassinet standard (F2194) and the infant inclined sleep product standard when the product is in the appropriate position.

The previous ballot F15 (17-05) item 013, had a note included in the scope that stated:

*Note: Products with adjustable seat back positions that are covered by other ASTM standards are excluded **except as noted below** (emphasis added).*

¹ 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.

The note below read:

1.4 If a product can be converted to an infant or newborn inclined sleep product as defined in 3.1.7 and 3.1.10 it shall be included in the scope of this standard when it is in the infant or newborn inclined sleep product use mode.

The negative vote received on the F15 (17-05), item 013 had suggested changing 1.3.5 to read:

Products that are covered by another ASTM standard, but which can be converted to one of the above products as defined in section 3 of this standard, are included in the scope of this standard.

As currently balloted 1.3.5 reads:

Any products above [meaning 1.3.1, 1.3.2, 1.3.3., and 1.3.4] that have adjustable seat back positions that are covered by other ASTM standards are excluded from the scope of this standard.

As balloted now, infant inclined sleep products are excluded from their own standard, instead of excluding other juvenile products that are not infant inclined sleep products. Commission staff recommends simply deleting 1.3.5.

Thank you for your consideration of this issue.

Sincerely,

Celestine T. Kish

Celestine T. Kish
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CPSIA Section 104 Rulemaking

cc: Len Morrissey, ASTM F15 Staff Manager
Patricia Edwards, CPSC Voluntary Standards Coordinator