



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

June 15, 2016

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

Dear Mr. Perdue:

This letter provides U.S. Consumer Product Safety Commission staff's responses to concurrent subcommittee and main committee ballot number F15 (16-06) item: 18 Proposed Revision of ASTM F2057-14 *Safety Specification for Clothing Storage Units*, WK54569 preamble revision.¹

The F15 (16-06) Standard Safety Specification for Clothing Storage Units ballot item 18 proposes a revision to the preamble language.

This consumer safety specification has been created to provide performance specifications for clothing storage units. For many years the U.S. Consumer Product Safety Commission (CPSC) has collected data regarding incidents of injuries related to the use of clothing storage furniture. In response to the incident data compiled by the CPSC, as well as industry experience of actual customer use, this consumer safety specification has been prepared to minimize the hazards associated with these products. This specification does not address hazards created by blatant misuse of a product, including, but not limited to use of the product in a manner that is neither intended by the manufacturer nor reasonable foreseeable.

CPSC staff believes that the following changes should be made to the balloted language (a double underline indicates a recommended addition and a strikethrough indicates a recommended deletion):

This consumer safety specification has been created to provide performance specifications for free standing clothing storage units. For many years the U.S. Consumer Product Safety Commission (CPSC) has collected data regarding incidents of injuries related to the use of clothing storage furniture. In response to the incident data compiled by the CPSC, as well as industry experience of actual customer use, this

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.

Mr. Bill Perdue

Page 2

consumer safety specification has been prepared to minimize the hazards associated with these products. This consumer safety specification is intended to cover normal use and reasonably foreseeable misuse or abuse of the product. This specification does not address hazards created by blatant misuse of a product, ~~including, but not limited to use of the product in a manner that is neither intended by the manufacturer nor reasonable foreseeable;~~ use of a product without restraints does not constitute blatant misuse.

The hazard pattern in incident reports CPSC staff has examined shows that it is reasonably foreseeable for the consumer not to secure the unit to the wall. Therefore, CPSC staff believes that the preamble should clearly indicate that use of clothing storage units without restraints is not blatant misuse but is foreseeable misuse and would be covered by F2057-14. CPSC staff has previously made such recommendations. Accordingly, staff requests that these ballot items be rescinded and that the preamble provide the suggested clarification.

Sincerely,

Michael Taylor
Mechanical Engineer
Directorate of Laboratory Sciences
5 Research Place
Rockville, MD 20850

Cc: Patricia L. Edwards, CPSC Voluntary Standards Coordinator