



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

February 20, 2007

Mr. Clair Arsenault  
ASTM Portable Infant Walkers Subcommittee Chairman  
Graco Children's Products  
150 Oaklands Boulevard  
Exton, PA 19341

Re: ASTM F 977-03, Standard Consumer Safety Specification for Infant Walkers

Dear Mr. Arsenault:

The U.S. Consumer Product Safety Commission (CPSC) staff\* recently conducted tests on infant walkers manufactured by a Juvenile Products Manufacturers Association (JPMA) certified firm. When the walkers were tested to section 7.6.5 *Rearward Facing Step Test* of ASTM F 977-03, the test results were inconclusive as the walkers sometimes met the test requirements, while other times, they did not. Because of this apparent inconsistency, staff has identified test methods in the standard that are somewhat ambiguous and thus can possibly influence the test results.

CPSC staff requests that the ASTM subcommittee on infant walkers consider revising the standard, in an effort to make these test methods more definitive for consistent test results. CPSC staff is available to discuss our test results in more detail at the next subcommittee meeting and is willing to work on this issue with the subcommittee. If you have any questions or comments with regard to this request, please feel free to contact me at 301-504-7577 or at the address above.

Sincerely,

Patricia L. Hackett  
Directorate for Engineering Sciences

Cc: Kathy Morgan, ASTM  
Kandi Mell, JPMA  
Colin Church, CPSC Voluntary Standards Coordinator

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