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LOG OF MEETING

SUBJECT: ASTM F15.11 Working Group Meeting on Portable Bed Rail Performance Requirements

DATE OF MEETING: November 1, 2000

DATE OF LOG ENTRY: November 27, 2000

PERSON SUBMITTING LOG: Scott Heh - ESME *SH*

LOCATION: Holiday Inn, Bethesda, MD

CPSC ATTENDEES: Scott Heh - ESME, George F. Sushinsky - LSE, Patricia Hackett - ESME, Joyce McDonald - EP

NON-CPSC ATTENDEE(S): Members and guests of ASTM F15 Working Group of Portable Bed Rail Performance Requirements. An attendance list was not available at the time of this report. The list below contains most of the participants.

Kitty Pilarz - Fisher Price, Kandi Mell-JPMA, Bob Waller-JPMA, Rick Locker- JPMA Counsel, Terry Emerson-COSCO, Representative from First Years, Representative from Evenflo, Representative from ITS Testing, Representative from Safety First, John Preston-Consultant

SUMMARY OF MEETING:

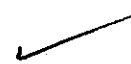
It was reported that main committee ballot on a Portable Bed Rail Standard for Warning Labels and Instructions had one negative vote that was found non-persuasive by the Subcommittee. This non-persuasive finding will go to ballot to be upheld. A final standard (on labeling) could be published as soon as 6 months.

Manufacturer members of the working group stated that they were in general agreement with earlier CPSC staff draft provisions concerning requirements for enclosed openings and protrusions, but that there was still disagreement over performance requirements related to bed rail displacement (retention).

A few manufacturer representatives stated objections to the CPSC staff draft performance provisions because it would lead to an essentially fixed (non-movable) barrier. In the case of portable bed rails, they submitted that this could lead to a more hazardous condition. As support for their concern, JPMA counsel stated that CPSC data shows that there are far more fatal incidents that occur between a wall and a bed for children under age 1 year. Since a wall is essentially a full-length fixed barrier, it raises concerns by the manufacturers if portable bed rails were made more like a fixed barrier.

The CPSC staff in attendance responded that the more critical element is the existence (or the

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formation of) a hazardous gap, and not whether the barrier is fixed. CPSC staff pointed out that there are other juvenile product standards (cribs, bunk beds, and toddler beds) that allow for fixed barriers. The entrapment hazard in these products is addressed by limiting sizes in gaps and openings through test requirements and mattress specifications.

The manufacturers continued the discussion stating that portable bed rails are not intended to function as an unyielding barrier for a child. They stated that it may not be necessary for a bed rail to be a fixed barrier to function if all that is needed is a guard to 'remind' the child that he is at the edge of the bed.

The manufacturer representatives stated that they believed it is beneficial to have bed rail retention performance requirements, but that such requirements should be based more on "real-world" data. They believe that the incident cases on portable bed-rails shows that the fatal entrapment danger is present for the infants and they proposed that a performance test should be based on the characteristics of the child at risk. The manufacturers proposed that rather than a static force application test, they supported the development of a dynamic bed rail retention test similar to a dynamic test in a draft British Standards Institute (BSI) standard for children's bedguards¹. This test calls for a cylinder (representing a child) to be rolled on an inclined plane from the mattress into the side of the bed rail. The manufacturer representatives proposed that a test cylinder be based on the anthropometric dimensions of a 6-month-old child. This test differs from the static force test that was proposed by CPSC staff.

The status of the BSI standard was discussed among the group. It was stated that it is not clear whether the standard is available in a final approved version. I said that I was informed that the standard is approved but is not yet published. J. Preston said that he was informed that the standard still needed some final editing and was still lacking figures. One manufacturer representative the sells in the U.K. stated that he believes the BSI standard is not an appropriate approach to this issue and that European Standard (CEN) community decided not to adopt the BSI standard because of issues similar to those raised by U.S. manufacturers.

The manufacturers in the working group asked the CPSC staff whether we would support the rolling cylinder approach. I stated that we could not say at this point until some testing is completed on actual products and the results can be examined. The CPSC staff also suggested that testing should be considered using more than one cylinder size, including a cylinder that represents an older child. The meeting adjourned with an agreement that someone in the working group would draft a proposed test procedure for a dynamic retention test and send the draft to the CPSC staff within the next few weeks.

Cc
Colin Church, EXHR
OS

¹ The draft BSI standard includes both static and dynamic tests.