

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

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August 11, 2005

Mike Adams Chairman, ASTM F15.10

RE: ASTM main committee ballot F15 05-03.

Dear Mr. Adams:

These comments are those of the staff of the U.S. Consumer Product Safety Commission (CPSC), have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission. The CPSC staff is providing comments in response to ballot F15 05-03 on the draft specification for the determination of child-resistance of portable fuel containers intended for consumer use, dated July 1, 2005.

The CPSC staff appreciates the work of the new subcommittee Chairman, Mike Adams to address the comments and negative votes associated with past drafts of the standard. This current revision addresses the comments related to the child and adult test procedures the CPSC staff expressed in past correspondences.

The CPSC staff notes that Section 5.2 of the standard was modified to eliminate the size of the closures to be used for the screening procedures, which was a point of concern for CPSC staff. The amendment language will allow for the use of closures more similar in size to those on the gas cans being tested. However, the CPSC staff continues to believe that conventional (non-CR) gas containers should be used for the screening of adults, since the purpose of the screening is to make sure that child-resistant gas cans are not being tested by people who are unable to use conventional gas cans.

The CPSC staff supports the draft standard and hopes that it will be adopted by ASTM and utilized by the gas can industry.

Please contact me if you have questions.

Sincerely,

/s/

Suzanne Barone, Ph.D.

CPSC Hotline: 1-800-638-CPSC(2772)? CPSC's Web Site: http://www.cpsc.gov

Thank you for your vote.

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Ballot Number: F150305

15 Abstain

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