



UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

ACTING CHAIRMAN ANN MARIE BUERKLE

February 27, 2019

Richard Rosati
ASTM Subcommittee Chair for F15.42, Furniture Safety
ASTM International
100 Barr Harbor Drive
West Conshohocken, PA 19428

Dear Mr. Rosati,

As you are aware, the staff of the Consumer Product Safety Commission has embarked on a major testing program to evaluate the stability of popular clothing storage units currently on the market. The program will also evaluate new test configurations, conditions and procedures, with a view towards identifying potential improvements to the current voluntary standard, ASTM 2057-17. I have asked the staff to keep your subcommittee well informed as this process moves forward.

In the meantime, there are two actions that your subcommittee could take that would improve the current standard significantly. One is to increase the test weights (fig. 5) used in section 7.2 Stability with Load of the standard from 50 to 60 pounds. The other is to expand the scope of the standard to include clothing storage units that are between 27 and 30 inches in height.

Previous testing at the CPSC and elsewhere has shown that many clothing storage units already can withstand tipping at higher test weights. Until the results of CPSC's test program are known, I believe this is the best available step to strengthen the standard and improve the stability of clothing storage units. Adopting this approach would also end the unproductive debate about the exact age of children the current standard was intended to protect.

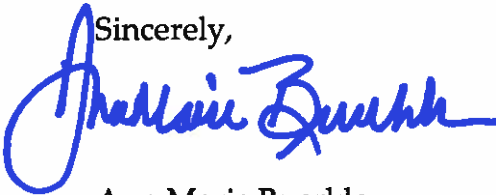
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Testing has also shown that units below 30 inches in height are capable of meeting the performance requirements of the standard, even at higher test weights. CPSC data show that tipovers of such shorter units can cause significant injuries to young children and even death. Expanding the scope of the standard to include these units will help prevent these tragic events.

I urge you and the subcommittee to move ahead with these improvements to the standard at your earliest possible convenience. I appreciate all of the work that the subcommittee has done on this issue. If I can be of further assistance, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ann Marie Buerkle". The signature is fluid and cursive, with a large initial "A" and "B".

Ann Marie Buerkle
Acting Chairman