



January 14, 2019

Andy Counts, Chief Executive Officer
American Home Furnishings Alliance
1912 Eastchester Drive, Suite 100
High Point, NC 27265

Dear Mr. Counts:

As safety advocates and the parents of children killed by dressers that tipped over, we are writing to urge the American Home Furnishings Alliance (AHFA) to support efforts to substantially strengthen ASTM F2057, the furniture industry's voluntary standard intended to reduce tip-over deaths and injuries associated with dressers and other clothing storage units.

The most time-sensitive subject we raise is to urge you to support expanding the scope of the standard to include dressers 30 inches in height and shorter—an issue currently before the ASTM Furniture Safety Subcommittee. We request that the AHFA and its members support this essential step to improve children's safety. Information gathered by the Consumer Product Safety Commission (CPSC) and shared with the subcommittee shows that a dresser just 27.5 inches in height is associated with a child's death, and data from recent Consumer Reports testing shows that dressers 30 inches tall and shorter can be built to be both affordable and more stable.¹ It is critical that this standard move forward expeditiously and not only cover shorter dressers that are known to have killed children, but also include a margin of safety.

The toll of furniture tip-over incidents on children is severe. According to the Consumer Product Safety Commission (CPSC), dresser and other clothing storage unit tip-overs are lethal, accounting for at least 206 reported deaths since the year 2000, with most of the victims younger than age 6. The latest CPSC research also shows that between 2015 and 2017, there were an estimated 2,500 emergency department-treated child injuries each year, on average, involving chests, bureaus, or dressers alone, with additional injuries also involving televisions.²

¹ "Dressers Exempt From Industry Safety Standard Fail Consumer Reports' Tests," Consumer Reports (last updated Nov. 16, 2018) (online at www.consumerreports.org/furniture/furniture-dressers-exempt-from-industry-safety-standard-fail-consumer-reports-tests) (hereinafter "Consumer Reports, Nov. 2018").

² Adam Suchy, Directorate for Epidemiology, Division of Hazard Analysis, U.S. Consumer Product Safety Commission, "Product Instability or Tip-Over Injuries or Fatalities Associated with Televisions, Furniture, or Appliances: 2018 Report" (Oct. 2018) (online at www.cpsc.gov/s3fs-public/Product%20Instability%20or%20Tip%20Over%20Report%20Oct%202018_STAMPED.pdf).

With children's lives at stake, and so many each year needing to go to the emergency room from tip-over incidents, it is critical to act now. We urge the AHFA and its members to work with us to improve safety by increasing the test weight in the loaded stability test so that it accurately accounts for the weight of children up to and including age 5, as the language in the standard currently states; by including dressers 30 inches in height and shorter in the scope; and by including testing requirements that more effectively replicate real-world situations that lead to tip-over incidents.

These goals are all consistent with your comments about the ASTM standard in a January 7, 2019, article published by *Furniture Today*, in which you emphasized the importance of ensuring that "any changes are based on relevant data and are focused on increasing stability and improving safety." We agree with that focus, but disagree with your final point that "the loudest voices at the table seem more fueled by political interest in generating headlines than in meaningful improvements to products."³ This statement does not reflect our experience of the ASTM Furniture Safety Subcommittee. Moreover, it undermines the spirit of open dialogue, transparency, and collaboration that can lead to meaningful progress on voluntary safety standards and which, if fostered in this subcommittee, could help lead to substantial reductions in deaths and injuries from furniture tip-overs.

The most forceful and compelling arguments for strengthening the voluntary standard have been "based on relevant data" and "focused on increasing stability and improving safety." This includes the case for altering the current 30-inch height limit, given the lack of a data-driven justification for this cut-off. As documented in a recent Consumer Reports story, dressers 30 inches tall and shorter have been linked to multiple deaths, and comparative stability test results show that a standard including dressers 30 inches and shorter is both feasible and necessary.⁴ Specifically, when a series of three progressively tougher tests were conducted on 17 dressers marketed as measuring 30 inches tall and under,⁵ more than half (nine) failed all but one of the tests, but five units passed all tests, including one available at an affordable \$150 price point.⁶

While a height limit is not necessary for determining scope, if the task group decides to include one, the limit should be set at 27 inches or shorter. This would account for: (1) the August 2017 death of a 2-year-old girl in Buffalo, NY, associated with a dresser 27.5 inches in height, as documented in a CPSC in-depth investigation (IDI) document shared with the Scope Task Group; and (2) Consumer Reports market research discussed with the task group that found products for sale marketed as a "dresser" and were as short as 27 inches in height.

Thank you for your consideration. We look forward to your reply, and hope to hear that the AHFA will put children's safety first by expeditiously and substantially strengthening the voluntary standard.

³ "What are the top issues facing the industry in the coming year?," *Furniture Today* (Jan. 7, 2019) (online at www.furnituretoday.com/article/560743-what-are-top-issues-facing-industry-coming-year).

⁴ Consumer Reports, Nov. 2018.

⁵ Three of these units, once measured in CR's lab, were found to be slightly taller than 30 inches in height.

⁶ Consumer Reports, Nov. 2018.

Sincerely,

Consumer Federation of America
Consumer Reports
Kids In Danger
Parents Against Tip-Overs

cc: Bill Perdue, Vice President of Regulatory Affairs, AHFA
Len Morrissey, Director, Global Business and Strategy, ASTM International
Rick Rosati, Vice President, Governmental Affairs and Industry Standards, Bureau
Veritas Consumer Products Services
Participants in ASTM Subcommittee F15.42 on Furniture Safety