

January 11, 2021

Office of the Secretary
Consumer Product Safety Commission
Room 820
4330 East-West Highway
Bethesda, Maryland 20814

Comments to the U.S. Consumer Product Safety Commission on the Notice of Proposed Rulemaking on a Safety Standard for Crib Mattresses

Thank you for the opportunity to submit comments on the safety standard for crib mattresses. The undersigned are individuals and organizations with a deep commitment to safe sleep for infants.

Section 104 of the Consumer Product Safety Improvement Act of 2008 (CPSIA), known as the Danny Keysar Child Product Safety Notification Act, requires the U.S. Consumer Product Safety Commission (CPSC) to develop strong safety standards for durable infant and toddler products. This Proposed Safety Standard for Crib Mattresses adds crib and other sleep product mattresses to Section 104, as CPSC has done with other durable infant and toddler products over the years. Our organizations support including mattresses under this section and support this proposed rule. The work on this proposed standard started with a petition filed by Keeping Babies Safe to eliminate supplemental mattresses sold for, and used in mesh play yards in addition to non-full size rigid cribs. The proposed rule will cover all mattresses sold with or for cribs, non-full-size cribs and play yards.

Our organizations, along with others in the child safety and public health arenas work tirelessly to educate parents on safe infant sleep. A flat, firm sleep surface is key to that message. The presence of soft mattresses and supplemental mattresses on the market confuses the message and leads to unsafe sleep environments and deaths. We applaud this effort to put a strong standard for all crib and play yard mattresses in place to address suffocation, entrapment and provide a safe sleep environment.

The NPR incorporates a firmness test based up on the Australian/New Zealand standard, AS/NZS 8811.1:2013, *Methods of Testing Infant Products: Part 1: Sleep Surfaces—Test for Firmness*. This test would measure the firmness of the mattress to prevent suffocation and entrapment. We urge the CPSC to use the test not only to keep soft mattresses off the market, but to analyze infant deaths on mattresses to continue to develop the test to accurately identify mattresses that increase the risk of death or injury.

It is vital that the proposed rule address aftermarket mattresses. For mesh cribs or play yards, aftermarket mattresses, if available, must meet the same requirements as the pad sold with the unit and be tested along with any unit for which it is labeled as an acceptable replacement. Mattresses for mesh play yards that don't meet those requirements, such as simple foam pads with no support, must be banned by this proposed rule.

The “Bare is Best” message along with “Back to Sleep,” can lead to a reduction in infant sleep related deaths, but only if the CPSC is committed to communicating these the safety messages and if the CPSC is committed to taking products off the market and recalling those products that run afoul of that message.

Again, thank you for the opportunity to provide comments. We look forward to working with the CPSC to address these concerns and others that may arise to ensure that sleeping environments do not pose risks to infants.

Sincerely,

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