



October 6, 2014

Office of the Secretary
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814

**Re: NOTICE OF PROPOSED RULEMAKING (NPR): CPSIA SECTION 104:
Safety Standard for Sling Carriers: Docket No. CPSC-2014-0018**

Dear Mr. Stevenson:

The Juvenile Products Manufacturer's Association ("JPMA") appreciates the opportunity to comment on the July 23, 2014 Federal Register notice of requirements, "Safety Standard for Sling Carriers" (CPSC Docket No. CPSC-2014-0018). The U.S. Consumer Product Safety Commission ("CPSC") invited comments pursuant to Section 104 of the Consumer Product Safety Improvement Act ("CPSIA"), which directs the Commission to issue mandatory regulation on durable infant products. In response to the request of the Commission's staff, the JPMA submits the following comments.

The Juvenile Products Manufacturers Association (JPMA) is a national not-for-profit trade organization representing 95% of the prenatal industry including the producers, importers, or distributors of a broad range of childcare articles that provide protection to infants and assistance to their caregivers. JPMA exists to advance the interests, growth and well-being of North American prenatal to preschool product manufacturers, importers and distributors marketing under their own brands to consumers. It does so through advocacy, public relations, information sharing, product performance certification and business development assistance conducted with appreciation for the needs of parents, children and retailers. JPMA continues to work with government officials, consumer groups, and industry leaders on programs to education consumers on the safe selection and use of juvenile products.

JPMA hopes that these comments will assist the Commission in effectively implementing regulations in a consistent manner with hazard based requirements under ASTM F2907-14b "Standard Consumer Safety Specification for Sling Carriers." JPMA reserves the right to supplement or amend its comments as appropriate.

As the CPSC is aware, JPMA and its members have been active participants in supporting the current progression of the sling carrier standard as well as the efforts by CPSC staff in pursuing a comprehensive Final Rule. While we sincerely appreciate and acknowledge the hard work and dedication that has been conducted by CPSC staff in

enacting a mandatory performance standard for this product category. That said, however, we believe that CPSC should incorporate, by reference, ASTM F2907-14b, “Standard Consumer Safety Specification for Sling Carriers,” rather than the NPR proposed adoption of ASTM F2907-14a. We believe that the added definition for *ring sling* and the addition of Section 6.3.1 to define occupant retention for ring slings enhances and strengthens the performance standard for this product class. JPMA acknowledges and believes that the collaborative work among ASTM task groups, the sling carrier subcommittee, and CPSC staff has resulted in the Commission’s ability to confidently incorporate, by reference, ASTM F2907-14b, “Standard Consumer Safety Performance Specification for Sling Carriers.” in the final proposed NPR.

JPMA believes that this outcome serves as an important example of the way in which all stakeholders can work together in achieving a truly collaborative and comprehensive standard that addresses the concerns of all vested parties. While this serves as a great example of collaboration, this success did not come without the dedication and investment of time and effort by task group participants committed to ensuring the integrity of the standard.

The ASTM process rests on individual participants’ ability to comment on draft proposals, initiate revisions to a standard and finally review a final document before approval to ensure that all issues are vetted appropriately. While this process may take time from a CPSC standpoint, this approach assures that everyone’s voice is heard and that the “*best standard*” is available for publication and consequently CPSC staff Final Rule reference.

JPMA would also like to comment on statements made during the June 25, 2014 briefing on this NPR. As you may recall, Acting Chairman Adler expressed his disappointment with 3rd party independent testing labs and their inability to “offer significant discounts to the small manufacturers.”¹ Like Mr. Adler, JPMA shares these concerns and has worked tirelessly with the various labs who participate within our certification program to address many of the concerns of our small manufacturers. We continue to be supportive of reducing the costs of testing on our small manufacturers and greatly appreciate the Commission’s willingness to continue to do the same.

With that being said, JPMA continues to be supportive of the task group’s effort and would like to encourage the CPSC to adopt by reference, ASTM F2907-14b as the final rule.

Sincerely,



Mark S. Fellin, MPS
Director of Regulatory and Legislative Affairs, JPMA

¹ <http://www.cpsc.gov/en/Newsroom/Multimedia/?vid=70227>