



February 7, 2023

*Via email*

**Alexander Hoehn-Saric**

Chairman

U.S. Consumer Product Safety Commission

4330 East-West Highway

Bethesda, MD 20814

**RE: *Consideration of the Revised ASTM F2057-23 Furniture Safety Standard for Clothing Storage Units as directed by STURDY***

Chairman Hoehn-Saric:

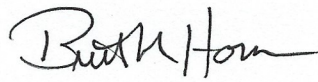
On behalf of **Parents Against Tip-overs** [PAT] and the **American Home Furnishings Alliance** [AHFA], we write today urging the Consumer Product Safety Commission to complete a prompt review of **ASTM F2057-23** as required by the STURDY Act [the Act]. As outlined below, we believe the updated ASTM standard meets the specific requirements of the Act:

- It includes performance tests that simulate “real-world” use of clothing storage furniture;
- It includes performance tests that account for the impact of carpeted flooring on CSU stability, as well as the impact of “loaded” drawers, multiple drawers open, and the dynamic force of a child climbing or playing on the unit; and,
- The performance tests simulate the weight of children up to 60 pounds and apply to all clothing storage units 27 inches and above in height.

As required by the ACT, the updated ASTM standard has been approved by the ASTM F15.42 Furniture Safety Subcommittee and was published within 60 days of enactment on **February 7, 2023**. This is the result of an extraordinary collaborative effort between parents, industry, consumer advocates and child safety experts, all united in the goal to advance child safety. With support from this broad stakeholder group, the revised ASTM standard – along with the amended STURDY Act that endorses it – achieved rare bipartisan backing in Congress.

PAT and AHFA are united in this request for prompt agency action to review and consider F2057-23 as a mandatory product safety standard for clothing storage furniture.

Respectfully,



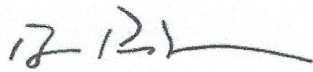
**Brett Horn**

Chairman

Parents Against Tip-overs

816-550-3999

[horn.brett@sbcglobal.net](mailto:horn.brett@sbcglobal.net)



**Bill Perdue**

VP Regulatory Affairs

AHFA

336-881-1017o

[bperdue@ahfa.us](mailto:bperdue@ahfa.us)

C.C.: Commissioner Peter Feldman  
Commissioner Mary Boyle  
Commissioner Richard L. Trumka, Jr.  
CPSC Secretary Alberta E. Mills  
CPSC General Counsel Austin Schlick