

September 15, 2015

Office of the Secretary
Consumer Product Safety Commission
Room 502
4330 East-West Highway
Bethesda, Maryland 20814
Via: www.regulations.gov
Facsimile (301) 504-7923

**Comments of Kids In Danger, Consumer Federation of America and
Consumers Union to the U.S. Consumer Product Safety Commission on
“Safety Standard for Portable Hook-On Chairs”
CPSC-2015-0016-0001**

Kids In Danger (KID), Consumer Federation of America (CFA) and Consumers Union (CU) submit the following comments in response to the U.S. Consumer Product Safety Commission (“CPSC” or “Commission”) in the above-referenced matter.

Section 104(b) (“Danny’s Law”) of the Consumer Product Safety Improvement Act of 2008, Public Law 110-314, 122 Stat. 3018 (“CPSIA”), requires the CPSC to promulgate consumer product safety standards for certain durable infant and toddler products. In this Notice of Proposed Rulemaking (“NPR”) the CPSC is seeking comment on its proposed safety standard for portable hook-on chairs, a type of high chair for infants and toddlers. The proposed standard adopts without changes or additions voluntary standard ASTM F 1235-15, “*Standard Consumer Safety Specification for Portable Hook-On Chairs.*”

We agree with the CPSC staff’s recommendations regarding adoption of ASTM’s F1235-15 standard. The hazards involving past recalls have been addressed in the standard and the warnings are clear and easy to understand.

We urge the Commission to adopt this proposed rule in its implementation of Section 104(b) of the CPSIA.

Respectfully submitted,

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