

May 16, 2018

The Honorable Ann Marie Buerkle, Acting Chairman
The Honorable Robert Adler, Commissioner
The Honorable Elliot Kaye, Commissioner
The Honorable Marietta Robinson, Commissioner
U.S. Consumer Product Safety Commission
4330 East-West Highway
Bethesda, MD 20814

Dear Acting Chairman Buerkle and Commissioners Adler, Kaye, and Robinson:

The undersigned groups write regarding proposed amendments of the Consumer Product Safety Commission (CPSC) to its fiscal year (FY) 2018 Operating Plan, which the Commission will consider at its FY 2018 Midyear Review decisional meeting tomorrow, May 17, 2018. The CPSC is a critical agency with insufficient funding and staff to fully carry out its safety mission. Accordingly, it is appropriate for the Commission to carefully consider operating plan adjustments to ensure that it prioritizes projects that would have a clear and forceful impact and would help eliminate or substantially reduce product-related deaths and injuries.

All of the CPSC's work to protect the public from safety hazards is critically important. Today, our groups share views on two topics in advance of the Commission meeting.

Portable generators: We continue to support the implementation of a mandatory standard for portable generators to address the risk of carbon monoxide poisoning and other safety risks associated with the products. Such a standard would apply across the marketplace, make it easier for the CPSC to ensure recalls occur when necessary, and, generally, more effectively protect consumers. We appreciate the CPSC's ongoing support for important safety research related to portable generator safety. We strongly support the expansion of work overseen by the agency to evaluate the effectiveness of the ANSI/PGMA and UL standards, as well as the additional funding proposed to carry out this work. It is essential to independently evaluate how likely these voluntary industry standards are to eliminate or mitigate generator-related deaths, injuries, and illnesses, and to independently assess their adequacy under section 7(b) of the Consumer Product Safety Act. This work would help build toward what we advocate for consumers: a single, strong, enforceable standard that eliminates or sufficiently reduces deaths and injuries associated with these products.

Furniture tip-overs: We remain very concerned about injuries and deaths associated with tip-over incidents, particularly those involving dressers and other clothing storage unit (CSU) furniture. As the Commission is already aware, Consumer Reports recently published a major package of stories about the dangers of furniture tip-overs to young children, which follows previous research, testing, and advocacy by other groups, including the organizations signing this letter. Based on the full body of evidence, the voluntary industry standard ASTM F2057-17 is inadequate, and it is feasible for manufacturers to meet a significantly stronger standard that protects more children and addresses more CSUs. We appreciate the CPSC's continued attention to furniture tip-overs involving dressers and other CSUs, including through

its consideration of comments responding to the advance notice of proposed rulemaking and by allocating extra funds as indicated in the proposed amendments to the FY 2018 operating plan. However, the agency should do more to expedite the completion of a strong mandatory safety standard for CSUs. We urge the Commission to allocate significant additional funding toward work that directly relates to the establishment of strong, binding CSU performance requirements.

Thank you for your consideration of our comments. We look forward to continuing to work with the Commission to advance consumer safety during the remainder of FY 2018, as well as in future years, to substantially reduce product-related deaths and injuries.

Sincerely,

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