

February 12, 2026

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

**Joint Comments to the Consumer Product Safety Commission
Request for Comment: Revision to the Voluntary Standard for Infant and Cradle Swings**

Docket No. CPSC-2013-0025

The undersigned organizations provide the following comments in connection with the Consumer Product Safety Commission's (CPSC) Request for Comment regarding the Revision to the Voluntary Standard for Infant and Cradle Swings, Docket No. CPSC-2013-0025.

On January 26, 2026, ASTM notified the Commission that it had approved and published a revised version of the voluntary standard, ASTM F2088-25. The CPSC is now assessing the revised voluntary standard to determine, consistent with section 104(b)(4)(B) of the Consumer Product Safety Improvement Act (CPSIA), its effect on the safety of infant and cradle swings subject to 16 CFR part 1233.

We generally support the proposed revisions to the infant and cradle swing safety standard because the proposed requirements represent important updates, including limiting a swing's rest (non-rocking) angles.

Additionally, we respectfully urge the Commission to consider whether it would be feasible to conduct safety testing while the product is in motion, not just in a static position. Infant and cradle swings are intended for continuous motion during periods of use and may result in unintended infant repositioning during this normal and foreseeable use. As such, testing the product in static configurations alone does not adequately capture real-world safety performance under actual use conditions. Caregivers reasonably rely on these products specifically for their motion features and expect them to maintain an infant's position while these features are engaged. Testing should provide adequate protection for such use and better reflect real-world use patterns to the greatest extent possible.

We appreciate the Commission's consideration of these comments.

Respectfully submitted,

Consumer Federation of America
Consumer Reports
Safe Infant Sleep