Comment from Jose Tan

I am the product safety compliance specialist, and we imports more than 100 types sleepwear from china every year. The number will be increased this year.

Whether the estimated burden of the proposed collection of information is accurate;

Comments: the time cost of testing and maintenance of the testing records is more than 3 hours per item. Especially the testing costs too much time. We have to test 2-3 samples respectively in 3 stages, fabric, prototype and garment. If the test is failed, the specimens should be double. The test of each samples contains cutting, drying in oven, cooling, and burning, and the time cost is about 1.5 hours. Besides, the fabric should be wash and dry 50 times, whether you add flame retardants or not, and this costs nearly 2 weeks (1.5 h for one wash-dry cyles, 4-5 cycles each day in lab. The maintenance of testing records is about 3-4 hours, including organize the reports and samples. In conclusion, the time cost of and maintenance of the testing records is 2 weeks, not 3 hours.

Whether the collection of information described above is necessary for the proper performance of the CPSC's functions, including whether the information would have practical utility;

No comments.

Whether the burden imposed by the collection of information could be minimized by use of automated, electronic or other technological collection techniques, or other forms of information technology.

The test reports and CPC could be collected electronically.