

**Please see below comment with regards to Docket Number CPSC–2020–0021.**

As a safety engineer at a juvenile products design house, I agree with the proposal to update the strength characteristics of children through this study. I also agree with the goal of recruiting younger children and updating the older studies.

Here are a few suggestions of metrics that I believe would be beneficial to measure:

1. Hand grip strength (to simulate a common squeeze release latch mechanism)
2. Push strength (on a small button or similar)
3. Pull strength (on a small knob or similar)
4. Push-up head strength (to validate the Play Yard entrapment test)
5. Seated leg press strength

All of these metrics would be vastly helpful in determining what designs are best at preventing hazardous situations. For example, metrics #1-3 would help determine which latching and locking mechanism designs are operable or inoperable by children. Metric #4 would assist in understanding how much force a child inside a play yard or crib might exert on an accessory above them if the product were improperly used. Metric #5 could inform several scenarios where a child might push with their legs against something, such as in a double stroller or play yard.

Additionally, I would suggest ensuring that all data is directly correlated to the age of the child being tested. Some of the older studies used 3-month age ranges to characterize the data. This broad generalization makes it much more difficult to determine the best design choice.

Finally, in response to the suggestion of measuring bite strength, I am not opposed. I think this measurement will have limited application, but it would be useful in some instances.

Sincerely,

Anna Carter

Iron Mountains, LLC