



October 30, 2020

Alberta E. Mills
Division of the Secretariat
Consumer Product Safety Commission
Room 820
4330 East West Highway
Bethesda, MD 20814

Re: Docket No. CPSC-2020-0021: Child Strength Study

Dear Secretary Mills,

I am writing on behalf of the members of the Juvenile Product Manufacturers Association (JPMA) to express our support for execution of a new Child Strength Study.

JPMA is a national not-for-profit trade association representing 95% of the prenatal to preschool products industry including the producers, importers, and distributors of a broad range of childcare articles that provide protection to infants and assistance to their caregivers. JPMA supports the industry and the goal of children's safety through information sharing, product performance certification, and business assistance conducted with appreciation for the needs of parents, children, caregivers, and retailers. JPMA actively works with government officials, consumer groups, and industry leaders on programs to educate consumers on the safe selection and use of juvenile products.

As the voice of the juvenile products industry, we categorically believe it is in the best interest of the agency, voluntary standard setting bodies and individual manufacturers to have available recent, reliable and credible data. The ASTM voluntary standard setting process, upon which our industry relies to create safe products, leans heavily on the CPSC for appropriate and relevant data. While the current child strength data has served the industry well in the past, it is high time to invest in this new study, seeing as the data currently being used is more than four decades old. As a single example, the CDC relies on the annually updated National Health and Nutrition Examination Survey (NHNES) study¹ for its anthropometric data, a study which is nationally representative.

JUVENILE PRODUCTS MANUFACTURERS ASSOCIATION, INC.

1120 Route 73, Suite 200 • Mt. Laurel, NJ 08054
TEL: 856.638.0420 • **FAX:** 856.439.0525
jpma@jpma.org • www.jpma.org

¹ <https://www.cdc.gov/nchs/nhanes/index.htm>

Product safety is the top priority for JPMA and its' members. We appreciate the opportunity to provide comment on this matter and look forward to remaining engaged as leaders in ensuring the safe design, manufacture and use of juvenile products.

Respectfully Submitted,

A handwritten signature in black ink, reading "Kelly Mariotti". The signature is written in a cursive, flowing style.

Kelly Mariotti, JD, CPA, CAE
Executive Director