

Stevenson, Todd A.

From: Gabe Owens [gowens@apartmentfurnishingsco.com]
Sent: Monday, April 09, 2007 11:13 AM
To: Stevenson, Todd A.
Subject: Collection of Information-Mattress Flammability Standard

I am a manager at a small to medium size bedding manufacturer. I appreciate the opportunity to respond to the proposed extension of CFR 1632.

Highlighted text has been copied/pasted from the:

Federal Register / Vol. 72, No. 40 / Thursday, March 1, 2007 / Notices - Dated: February 26, 2007.
Todd A. Stevenson,
Secretary, Consumer Product Safety
Commission.
[FR Doc. E7-3628 Filed 2-28-07; 8:45 am]

B. Request for Comments

The Commission solicits written comments from all interested persons about the proposed collection of information. The Commission specifically solicits information relevant to the following topics:

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

Frankly, given the elevated standards for performance set forth under CFR 1633, CFR 1632 requirements have been rendered superfluous. It is a generally accepted view within the bedding industry that CFR 1632 should be *superseded* by the new standard. As a *superseded* document, implementation of CFR 1632 as it applies to mattresses (as defined by CFR 1633.2 (a)) should be terminated effective July 1, 2007.

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

The estimate set forth does not accurately reflect the burden of implementation; particularly upon the small/medium sized businesses with limited staffing resources.

—Whether the quality, utility, and clarity of the information to be collected could be enhanced; and
—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 answer to both of these questions would be rendered irrelevant if the logical course CFR 1632 termination were followed. However, assuming that the requirements of CFR 1632 continue to be imposed, the means of data documentation and transmission are not significant factors. It is the actual testing and data acquisition that constitute the "burden" imposed on *domestic* businesses.

Gabe Owens
Manager - Apartment Furnishings Co.

9000 Forum Way
Fort Worth, Texas 76140

Phone: 817-568-2002
Toll free: 866-504-5200

4/9/2007

Cell: 817-995-6393

Fax: 817-293-7345

On the web at: www.apartmentfurnishingsco.com