ConsumersUnion
POLICY & ACTION FROM CONSUMER REPORTS

July 3, 2014

Office of the Secretary
Consumer Product Safety Commission
Room 502
4330 East-West Highway
Bethesda, Maryland 20814
Via: www.regulations.gov

Comments of Consumers Union
To the U.S. Consumer Product Safety Commission
"Agency Information Collection Activities; Proposed Extension of Approval of Information Collection; Safety Standard for Bicycle Helmets"
Docket No. CPSC-2010-0056

Consumers Union (CU), the public policy and advocacy arm of Consumer Reports (CR), submits the following comments to the U.S. Consumer Product Safety Commission (CPSC) in the above-referenced matter. We strongly support the continuation of the current requirements for testing, compliance certification, labeling, and records maintenance as critically important for ensuring the safety of bicycle helmets.

CR has independently tested and reported on bicycle helmet safety on numerous occasions, beginning in 1990 and most recently in 2012. One of CR's bicycle helmet testing engineers has also served a member of the ASTM standards committee for headgear since 2008.

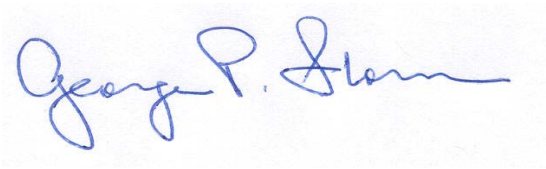
Our current tests to evaluate the safety of adult and youth bike helmets make use of test procedures patterned after the CPSC Safety Standard for Bicycle Helmets. We assess each model for retention system strength and impact resistance, along with ventilation, ease of use, and features.

Our most recent test, reported in the May 2012 issue of Consumer Reports Magazine, tested bicycle helmet impact absorption by dropping the helmets, in a controlled environment, at 11 MPH to 14 MPH. We found that "all but two models absorbed the force of impact within the g-force limit set by the current Consumer Product Safety Commission standard." As we wrote to CPSC at that time, based on that test, we recommend two improvements to the CPSC testing and reporting procedures to ensure that the standard provides appropriate protection to consumers:

First, we recommend that CPSC reconsider the 300 g impact ceiling in the current standard, set in 1998, in light of current research into the threshold magnitude at which impacts can cause brain injury. Several helmets we tested in 2012 measured much lower impacts than 300 g – at or below 260 g.

Second, we recommend that CPSC consider refining the positional stability test to more closely resemble conditions that would occur in an actual collision. The headforms used in the current test are slippery, and do not always fit the helmets well. This required us to over-tighten the chinstrap (beyond what the manufacturer recommends, and beyond what consumers would reasonably or realistically be expected to do) in order to conduct the test.

Respectfully submitted,



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