

*February 1, 2023*

Dear Representative/Senator,

On December 29, 2022, President Biden signed the 'Consolidated Appropriations Act, 2023' which included text of the STURDY Act. The STURDY Act directs the Consumer Product Safety Commission (CPSC) to conduct a rulemaking on Clothing Storage Unit (CSU) tip-overs with a requirement to adopt a revised ASTM voluntary standard (to be published in February 2023) as long as it meets certain requirements contained within the STURDY Act.

There is much to be done. CPSC must complete this rulemaking, with its determination of the revised voluntary standard, public comment, and final rule publication, within one year after enactment (December 29, 2023).

It is important to point out the ASTM revisions in STURDY were developed through a consensus driven process involving furniture industry stakeholders, parent and consumer groups, and testing labs. Everyone concerned about child safety was at the table and signed off. It is a standard the home furnishings industry has supported for more than 20 years.

To this point, the CPSC has done nothing to address how it will comply with the new law, instead focusing on its competing Final Rule for CSU tip-overs published in November 2022. That rule ignores the collaborative work of all stakeholders and is on the one hand, overkill and, on the other hand, nearly impossible to comply with.

Given the complexities involved in meeting a mandatory safety standard for CSU tip over, there is an urgent need for clarity and guidance from the Commission. The intent of the STURDY Act encouraged and empowered the work done by various stakeholders to improve child and family safety. It is critical for the CPSC follow the process included in the STURDY Act to advance consumer safety and reduce confusion for manufacturers, retailers, and consumers. For the CPSC to disregard that and move forward with its own agenda is unacceptable.

We urge you to contact the CPSC, ask them to pause implementation of their Final Rule, and comply with the STURDY Act.

Respectfully,



**Mark Schumacher**

*Chief Executive Officer  
Home Furnishings Association*