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To:
PFA Manufacturing Members
Associate / Supplier Members
Executive Committee

On May 18, Bobby Bush, Jim McIntyre and I participated in a public meeting at CPSC headquarters in Bethesda, MD regarding the development of a national flammability standard for upholstered furniture. The 181-page proposal is available for your review and can be downloaded for printing at <http://www.cpsc.gov/library/foia/foia05/brief/uphols1.pdf>.

The primary stakeholders, after reviewing the proposal, agree on the following points:

1. Both the smoldering ignition and open flame portions of the standard contain new test procedures that have not been scientifically validated as reproducible and should be investigated with round-robin testing.
2. A limited number of tests conducted by Hickory Springs and a chemical supplier indicate that the test described in the small open flame portion of the proposal would likely eliminate the use of lower density foam products. Calif. TB117+ products also do not consistently "pass" the maximum 20% weight loss requirement. There also may be reproducibility problems associated with the consistency of the cotton velvet fabric used in the open flame test.
3. According to the latest CPSC statistics, 90% of household fire deaths involving upholstered furniture are caused by smoldering ignition, while 10% of deaths are associated with small open flame ignition. The CPSC standard should concentrate on 90% of the problem -- smoldering ignition.
4. In the interest of improved fire safety, standard development time, the opportunity for consistent compliance and fair enforcement, and reasonable consumer costs, the CPSC was urged to pursue development of only the smoldering ignition portion of the proposal at this time. Our suggestion includes a smoldering ignition requirement for cover fabrics, loose filling materials, and fibrous battings. Foam cushioning materials would comply with Calif. TB117+. The combined effects of smolder resistant fabrics, filling materials and FR foam should address the need for smoldering ignition performance and also should improve resistance to small open flame ignition.

These points were presented to the CPSC representatives at the May 18 public meeting, and we will follow-up through additional discussions with CPSC representatives in the near future.

A briefing package is expected to be presented by staff to CPSC commissioners in September, 2005.

Sincerely,

A handwritten signature in black ink that reads 'Robert J. Luedeka'.

Robert Luedeka
Executive Director