



October 27, 2006

To Whom It May Concern:

For more than 30 years, the furniture industry has made great strides in reducing the flammability risks associated with its products by modifying materials and construction to better resist ignition by smoldering cigarettes – the primary cause of fires involving furniture. Our industry steadfastly believes that any injury or loss of life is tragic, and thus supports the Upholstered Furniture Action Council (UFAC) program, a set of voluntary construction guidelines with which the vast majority of currently manufactured upholstered furniture conforms.

Over the past 20 years, the incidence of upholstered furniture fires in the U.S. has been reduced by more than 85 percent, due to:

- compliance with the voluntary UFAC standard,
- declines in smoking prevalence and cigarette consumption, and
- increased use of residential smoke detectors.

In 1980, there were 1,059 deaths associated with 22,180 fires related to cigarettes; in 2002, there were 171 deaths associated with 3,176 fires.

Due to the fact that such a significant reduction in upholstered furniture fires and related deaths has been achieved with the voluntary UFAC standard, the AHFA encourages the Consumer Product Safety Commission (CPSC) to adopt UFAC as a mandatory national standard. This adoption would increase the level of compliance to a proven effective standard that saves lives.

To date, efforts at the CPSC have focused on making furniture resistant to more severe ignition sources such as matches, lighters and candles. A much less significant source of fires compared to cigarettes, these so-called “small open flame sources” present greater challenges not only because of the more intense ignition sources involved, but also the purposeful behavior (including child play and arson) often associated with such fires.

No workable solution exists for addressing fires caused by small open flame sources. Solutions currently being considered would involve the use of flame retardant (FR) chemicals. The resistance of upholstery to smoldering cigarettes has been achieved without the addition of such compounds; however, experts agree that FR chemicals will be required to achieve resistance to small open flame sources. The FR compounds used to treat fabrics and cushioning materials have come under increasing scrutiny as carcinogens and environmental toxins, and have been banned or restricted in Europe. California has begun a phase-out of these chemicals and other States are considering similar measures. As the furniture industry pursues greater fire safety, it is critical that we not impose offsetting chemical risks to our customers and our employees.

Consumers should be assured that product modifications will be made as they are proven safe, effective and affordable. However, technical solutions will take us only so far. Product advances must be combined with common sense measures that discourage fire play and minimize its consequences through detection and suppression as well as continued initiatives for installing and properly maintaining smoke detectors as a guard against all types of residential fires, including those involving upholstered furniture.

Sincerely,

A handwritten signature in black ink, appearing to read "Andy S. Counts". The signature is fluid and cursive, written over a white background.

Andy S. Counts
CEO