



NATIONAL ASSOCIATION OF STATE FIRE MARSHALS

Government Relations

November 22, 2000

Ms. Sadye Dunn
Office of the Secretary
U.S. Consumer Product Safety Commission
4330 East-West Highway
Bethesda, MD 20814

RE: Petition for Rulemaking on Flammability of Certain Items of Bedding

Dear Ms. Dunn:

The National Association of State Fire Marshals (NASFM) represents the most senior fire official in each of the 50 states and District of Columbia. Our mission is to protect life, property and the environment from fire. In keeping with this mission, we applaud the Commission's work to reduce the number of deaths attributed to open flame and cigarette ignitions of mattresses.

In the real world, mattresses typically are covered by sheets, blankets, comforters, pillows and other bedding. The fire incident data do not isolate the contribution of these items when mattress fires are reported. However, research conducted by the Building and Fire Research Laboratory at the National Institute of Standards and Technology (NIST) has quantified the amount of energy generated by various combinations of bedding ignited by an open flame. The results of NIST's work are known to the Commission, and NIST reports from this work are enclosed with this petition.

By far, these tests indicated that the most hazardous items of bedding were products such as pillows, comforters and mattress pads that contain filling materials used for comfort or thermal purposes. NIST burn tests found that these bedding products generated as much as 200 kilowatts of energy – easily enough to kill or seriously burn a person well before a mattress is ignited. The NIST research also indicated that other bedding products – including sheets and blankets – pose far less of a flammability hazard.

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Therefore, by this letter NASFM petitions the Commission to issue a flammability standard pursuant to Section 4 of the Flammable Fabrics Act, 15U.S.C. §1193, that would establish product performance requirements for the most flammable items of bedding. NASFM believes that this would contribute to a significant reduction in the incidence and severity of residential bedroom fires.

NASFM understands that the Sleep Products Safety Council is planning to conduct research at NIST to investigate how a mattress fire would be affected if certain bedding products contained flame-resistant fillings and interliner barrier fabrics. We hope the results of that research would be considered as part of the CPSC's response to this petition.

NASFM also is aware that the Commission is considering whether to initiate a rulemaking proceeding for the purpose of modifying the existing mattress flammability standard to address both smoldering cigarette and open flame ignition risks. Given the fact, as I have noted above, that mattresses are typically used only while covered with bedding products, NASFM believes that it is critical that the Commission's analysis consider the interaction between bedding products and mattresses in a real-world bedroom fire scenario. For this reason, NASFM urges that the Commission investigate these fabric flammability risks concurrently.

We believe that such action by the Commission is more than adequately justified by common sense and good science.

Thank you for keeping NASFM informed of the progress of this petition through communications with our Government Relations office at 1319 F Street, N.W., Washington, DC 20004; phone 202-737-1226; fax 202-393-1296.

Sincerely,

George A. Miller
President

Enclosure