



October 6, 2010

Office of the Secretary
Consumer Product Safety Commission
Room 502
4330 East-West Highway,
Bethesda, Maryland, 20814

Re: An Open Letter on Pending CPSC Actions Against Baby Slings

Dear Mr. Stevenson:

As you know, the Handmade Toy Alliance represents more than just toymakers, but small batch clothing and children's product manufacturers of all kinds. In particular, several of our members make or sell baby slings and work to promote the benefits of babywearing.

We understand that the Commission has been applying increased scrutiny to baby slings in the past few months. We also understand that several manufacturers of baby slings have been investigated and that one well-respected company may be facing a forced recall.

Before the Commission takes any further actions in these investigations, we urge it to consult closely with the Baby Carrier Industry Alliance (BCIA), which has been working tirelessly to develop ASTM standards for baby slings.

Babywearing is a time-honored practice all around the world. We agree with the BCIA that babywearing is safe and promotes the health and well-being of babies while strengthening the bonds between parents and babies. We urge the Commission to carefully consider the BCIA's white paper on the safety and benefits of babywearing, which can be found at <http://tinyurl.com/35o67t7>, before taking any further actions.

We join the BCIA to ask that: 1) all baby sling recall actions be stopped immediately; 2) the ASTM sling carrier standard should be voted on so that sling carriers may be tested for this safety standard; 3) the CPSC should provide baby sling manufacturers with scientific evidence of a product defect before forcing a recall.

There is a strong network of babywearing safety advocates and volunteer groups, including many HTA members, throughout the nation whose mission is to teach caregivers how to use their baby carriers safely and effectively. Baby carriers are absolutely safe; perhaps even safer than many other baby care devices such as swings, playpens, and car seats. Additionally, ASTM International just sent the baby sling voluntary standard to ballot this very week. This standard is the result of 3 years of hard work by consumer advocates, manufacturers, and members of the CPSC's own staff.

Please, do not rush to judgement on baby slings.

Thank you again for taking the time to read and consider our comments.

Respectfully Submitted,

The Handmade Toy Alliance

A listing of all 548 business members of the Handmade Toy Alliance is available at .
<http://www.handmadetoyalliance.org/AllianceInfo/OurMembers.aspx>