

2 8/3/94
Commission Proceedings

LOG OF MEETING

SUBJECT: PPPA Protocol Revisions

DATE OF MEETING: July 19, 1994

PLACE: CPSC Headquarters, Bethesda, MD. Room 518.

LOG ENTRY SOURCE: Suzanne Barone, Ph.D., Pharmacologist, HSPS *SB*

COMMISSION REPRESENTATIVE: See attached list

NON-COMMISSION REPRESENTATIVE: See attached list.

SUMMARY OF MEETING:

Representatives from ASTM D10.31 requested a meeting to discuss their comments on the proposed changes to the PPPA test protocols. The main issues discussed included, effective date, informed consent, sequential test, and innovative packaging. The ASTM requests a phase in by product category for the effective date. They stated that testing cannot begin until the final rule is published. The members reiterated concern about the use of informed consent in the child test and the increased cost and delay of testing that will result.

The members requested that the sequential test for seniors be voluntary. The CPSC staff indicated that the test was developed in response to comments made by ASTM and others. The members indicated that the protocol was biased against innovative designs. The staff stated that the 5 minute/1 minute protocol was instituted to promote innovative design. The first time period gives 5 minutes for people to become familiar with the package and open (and close) it properly. CPSC data indicate that people "learn." The time to open in the second period is significantly less, even for packages that are less familiar to people (unit dose or with the ASTM IB closure).

The staff assured the ASTM members that all the comments were being considered. The staff appreciated receiving data to document many of the comments. The staff estimates that a briefing package for the final rule will be presented to the Commission in December 1994.

July 19, 1994

ASTM D10.31

Name	Affiliation	Phone #
Suzanne Barone	CPSC	301-504-0477 x119
Nick Wakeman	Product Safety letter	(703) 247-3423
Debra Forio	Whitehall Robins	201-6605464
Rosalind L Gross	EPA	703-308-835
Stewart Dejonge	ASTM/PBS	215-252-4006
Edward R. Saylor	ASTM/Kerr	717-294-6511
NINA JOHNSTONE	ASTM/ATL	201-628-1363
Charles J. Wilbur	CPSC-HSPS	301-504-0477 ext 1204
Harley Ewell	CPSC-OGC	301-504-0980 x 2217
Peter Mayberry	HCPC	202-434-4268
Marcia Robins	CPSC-ELM	301 504-0962 x132
Jerry L. Gussinger	CPSC/EPHA	(301) 504-0470 x 126
DARLA WILLIAMSON	CMA	202-223-9050