



Standard Consumer Safety Specification for Bunk Beds¹

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INTRODUCTION

This consumer safety specification addresses bunk bed accidents that were identified by the U.S. Consumer Product Safety Commission (CPSC).

The CPSC estimates that in 1989, about 34 000 bunk bed-related injuries were treated in U.S. hospital emergency rooms, and about three fourths of those injured were under the age of 15. Most of these injuries were minor and were associated with victims who fell from, bumped into, or jumped from bunk beds. However, there are other less-obvious potentially serious hazards associated with bunk beds. For example, from 1973 through November 1990, CPSC also received reports of 83 deaths of children less than 15 years of age involving bunk beds. Seventy-four incidents, including 17 deaths, involved children who reportedly became entrapped between the mattress and guardrail; 24 incidents, including 5 deaths, involved children who reportedly became entrapped either between the mattress and bed structure or in the bed end structure; and 18 incidents, including 16 deaths, involved young children who reportedly became entrapped between the bed and the wall. The CPSC also received reports of 4 deaths due to failure of the mattress support, 19 deaths due to falls from bunk beds, 12 deaths due to strangulation when a belt, rope, or clothing became caught on the bed structure, and 10 deaths due to other or unknown causes.

1. Scope

1.1 This consumer safety specification establishes minimum requirements for the design and performance of bunk beds. It also contains requirements for labeling and instructional material.

1.2 This consumer safety specification is intended to minimize accidents to children resulting from normal use and reasonably foreseeable misuse or abuse of bunk beds. This consumer safety specification is written within the current state of the art of bunk bed technology and does not address bunk beds that are blatantly misused or are used in a careless manner that disregards warning statements and safety instructions provided with each bunk bed.

1.3 For the purpose of this consumer safety specification, a bunk bed (hereinafter referred to as a bed) is defined as any bed in which the underside of the foundation is over 30 in. (762 mm) from the floor.

1.4 This consumer safety specification does not address bunk beds for institutional use (for example, in prisons, military facilities, dormitories, and so forth).

1.5 The values stated in inch-pound units are to be regarded

as the standard. The values given in parentheses are for information only.

1.6 The following safety hazards caveat pertains only to the test methods portion, Section 5, of this specification: *This standard does not purport to address all of the safety concerns, if any, associated with its use. It is the responsibility of the user of this standard to establish appropriate safety and health practices and determine the applicability of regulatory limitations prior to use.*

2. Referenced Documents

2.1 Federal Standards:

16 CFR Part 1303 Ban of Lead-Containing Paint and Certain Consumer Products Bearing Lead-Containing Paint²

16 CFR Part 1500 Hazardous Substances Act Regulations,² including sections:

1500.48 Technical Requirements for Determining a Sharp Point in Toys and Other Articles Intended for Use by Children Under 8 Years of Age²

1500.49 Technical Requirements for Determining a Sharp

¹ This specification is under the jurisdiction of ASTM Committee F15 on Consumer Products and is the direct responsibility of Subcommittee F15.30 on Bunk Beds.

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² Federal regulations 16 CFR Part 1303, 16 CFR Section 1500.48, 16 CFR Section 1500.49, 16 CFR Part 1501, and 16 CFR Part 1632 are in effect and are administered by the CPSC. These federal regulations are not a part of this safety specification. This information is offered to all parties so that they know that these federal regulations must be adhered to outside the scope of this safety specification. Copies of the regulations may be obtained from The Office of the Secretary, U.S. Consumer Product Safety Commission, Washington, DC 20207.

- Metal or Glass Edge in Toys and Other Articles Intended for Use by Children Under 8 Years of Age²
- 16 CFR Part 1501 Method for Identifying Toys and Other Articles Intended for Use by Children Under 3 Years of Age Which Present Choking, Aspiration or Ingestion Hazards Because of Small Parts²
- 16 CFR Part 1632 Standard for the Flammability of Mattresses and Mattress Pads^{2,3}

3. Terminology

3.1 *Definitions of Terms Specific to This Standard:*

- 3.1.1 *bed, n*—for the purpose of this specification, a bunk bed, as described in 3.1.5.
- 3.1.2 *bed end structure, n*—an upright unit at the head and foot of the bed, to which the side rails attach.
- 3.1.3 *bed post, n*—an upright post at each corner of the bed structure.
- 3.1.4 *bed structure, n*—furniture parts assembled for the purpose of providing a sleeping environment.
- 3.1.5 *bunk bed, n*—for the purpose of this specification, any bed in which the underside of the foundation is over 30 in. (762 mm) from the floor.
- 3.1.6 *foundation, n*—of a bed, the base or support for a mattress.
- 3.1.6.1 *Discussion*—The foundation may be independent from or incorporated with the sleeping surface.
- 3.1.7 *foundation support system, n*—of a bed, those components of the bed structure that support the foundation.
- 3.1.8 *guardrail, n*—of a bed, a rail attached to each long side of the bed to help prevent a sleeping occupant from rolling or sliding out of the bed.
- 3.1.9 *interior bed structure, n*—the interior faces of the side rails and bed end structures.
- 3.1.10 *mattress, n*—a manufactured product intended to be slept on, consisting of various resilient materials covered with an outer ticking.
- 3.1.11 *permanent marking, n*—a marking or label shall be considered permanent if, during an attempt to manually remove it without the aid of tools or solvents, it cannot be removed, it tears, or it damages the surface to which it is attached.
- 3.1.12 *side rail, n*—of a bed structure, the rail attached to the bed end structures to which the foundation support system is fastened.

4. Performance Requirements

- 4.1 *Fit of Top Bed to Bottom Bed*—The bed post shall be designed so that the minimum height of lift to allow horizontal disengagement of the top bed from the bottom bed shall be 1¼ in. (32 mm), or a fastening mechanism may be used that will prevent the disengagement of the top bed from the bottom bed.
- 4.2 *Mattress and Foundation Size and Fit*—There shall be no gaps between the interior bed structure and the edges of the mattress and foundation that will permit complete passage of the wedge block shown in Fig. 1 when tested in accordance with 5.2.

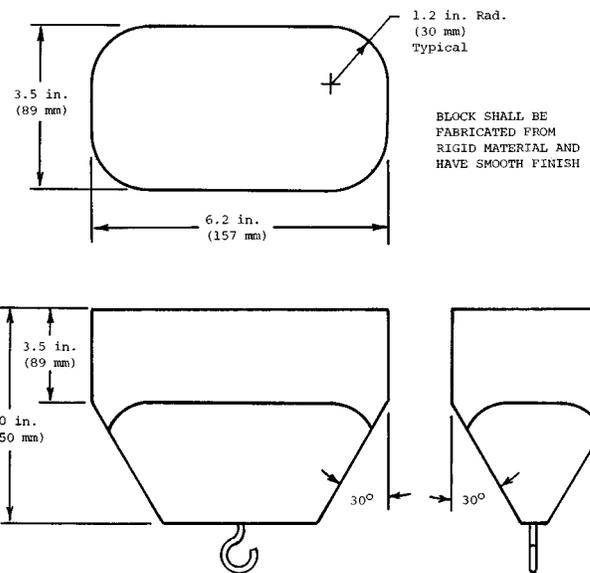


FIG. 1 Wedge Block for Tests in 5.2.3, 5.5.1, and 5.6.1

4.3 *Foundation Support System:*

- 4.3.1 The foundation support system shall confine the horizontal position of the mattress and the foundation and shall prohibit the mattress and foundation from falling into the clearance over the lower bunk or to the floor when the mattress or foundation is manipulated.
- 4.3.2 In the event cross-members are utilized, a minimum of two per bed are required. If more than two cross-members are utilized, they shall be spaced so that the distance between adjacent cross-members or between the cross-members and the bed end structures will not permit complete passage of the wedge block or will allow complete passage of both the wedge block and the 9 in. (230 mm) diameter rigid sphere when tested in accordance with 5.8.
- 4.3.3 The foundation support system shall not be capable of being dislodged without the release of positive fastening devices or the use of hand tools.
- 4.3.4 The foundation support system shall not fail when tested in accordance with 5.3.

4.4 *Side Rails:*

- 4.4.1 *Bolt-On Side Rails*, that attach at their ends or on their side to the bed post, shall be secured at each end by two bolts with a minimum size of ¼-in. (6-mm) diameter. For wood beds these bolts shall be spaced a minimum of 1½ in. (40 mm) apart on their centers. When the bolts are fully tightened in the assembled bed, no more than ¼in. (6 mm) of thread shall be exposed.
- 4.4.2 *Hook-On Side Rails*, securely attached to the bed post. Hook-on attachments shall require an additional action other than an upwards force to disengage.
- 4.4.3 *Side Rail Attachments*—There shall be no structural failure of bed side rail fastening systems when tested in accordance with 5.4.

4.5 *Guardrails:*

- 4.5.1 Two guardrails shall accompany any bed in which the underside of the foundation is over 30 in. (762 mm) from the floor. Guardrails may be separate from or integral with the ladder.

³ If beds are accompanied by mattresses.

4.5.2 Guardrails shall be attached in a manner that requires the intentional release of a fastening device or be so designed that they cannot be removed unless forces are applied sequentially in different directions.

4.5.3 The upper edge of the guardrails shall be at least 5 in. (130 mm) above the sleeping surface when a mattress of a thickness that is the maximum specified by the manufacturer's instructions is used on the bed.

4.5.4 With no mattress on the bed, there shall be no openings in the rigid bed structure below the lower edge of any opening of the guardrail that would permit complete passage of the wedge block shown in Fig. 1 when tested in accordance with 5.5.

4.5.5 A guardrail may terminate before reaching the bed end structure, providing there is no more than 15 in. (380 mm) between either end of the guardrail and the bed end structures in the same plane when measured at a point 5 in. (127 mm) above the sleeping surface as established by the maximum mattress thickness specified by the manufacturer. The second guardrail may terminate before reaching the bed end structure. If this guardrail terminates before reaching the bed end structure, there shall be no more than 0.22 in. (38 mm) between either end of the guardrail and the bed end structure when measured horizontally between the bed end structure and the nearest point on the guardrail.

4.6 *Bed End Structure:*

4.6.1 The upper edge of the upper bunk end structures for at least 50 % of the distance between the two posts at the head and foot of the upper bunk shall be at least 5 in. (130 mm) above the sleeping surface when a mattress and foundation of the maximum size and thickness specified by the manufacturer's instructional literature is used on the upper bunk.

4.6.2 There shall be no openings in the rigid end structures of the upper bunk that will permit the free passage of the wedge block shown in Fig. 1 when tested in accordance with 5.6.1. This requirement shall apply only to that portion of the bed end structure that is above the foundation support system of the upper bunk.

4.6.3 When tested in accordance with 5.6.2, there shall be no openings in the end structures of the lower bunk that will permit free passage of the wedge block shown in Fig. 1, unless they are large enough to permit the free passage of a 9 in. (230 mm) diameter rigid sphere. This requirement does not apply to openings that are below the level of the lower bunk foundation support system. This requirement shall apply to that portion of the bed end structure that is between the level of the lower bunk foundation support system and the level of the upper bunk foundation support system.

4.6.4 When tested in accordance with 5.6.2.3 and 5.6.2.4, all portions of the boundary of any opening of the lower bunk end structure that permits free passage of a 9 in. (230 mm) diameter rigid sphere also must conform to the neck entrapment requirement.

4.7 *Ladders:*

4.7.1 A lean-on (slanted) or hang-on (vertical) ladder shall be supplied with each bunk bed set or the ladder may be incorporated as part of the bed structure. The ladder may be separate from or integral with the guardrail. The ladder shall be

attached in a manner that prevents inadvertent disengagement, repositioning, or tilting while in use.

4.7.2 The width of the ladder shall be no less than 10 in. (250 mm) measured from the inside of the stiles. Vertical spacing of ladder steps shall be no greater than 12 in. (300 mm) when measured from the floor to the first step or between steps. When bed structures are used as ladders, vertical spacing may be up to 16 in. (400 mm).

4.8 *Metal Beds: Frame and Fastenings*—There shall be no separation of any of the attachments of the foundation support system to the end structures of the bed when tested in accordance with 5.7.1.1 and 5.7.2.

5. Test Methods

5.1 Assemble the bed in accordance with the provided instructions.

5.2 *Mattress and Foundation Size and Fit* (see 4.2):

5.2.1 Place the intended mattress and foundation, as specified by the instructions, on the bed.

5.2.2 Move the mattress and foundation horizontally to obtain the largest gap between the interior bed structure and the edge of the mattress and foundation.

5.2.3 Insert the wedge block shown in Fig. 1, tapered side downwards, and in the most adverse orientation, into any gap and gradually apply a 45-lbf (200-N) vertically downwards force. Sustain the force for a period of 1 min.

5.3 *Foundation Support System* (see 4.3)—Center a sheet of $\frac{3}{4}$ -in. (19-mm) thick plywood with dimensions 19 in. (480 mm) by 37 in. (940 mm) on the manufacturer's intended foundation (37-in. dimension parallel to the long axis of the bed), and place weights with a total mass of 400 lb (181.4 kg) on the plywood sheet. The weights shall be applied gradually and shall remain in place for a minimum of 5 min.

5.4 *Side Rails* (see 4.4)—Apply a downward vertical force of 225 lbf (1000 N) gradually, 10 in. from the bed end structure, and sustain it for 30 s. Apply the force sequentially to each corner of the bed.

5.5 *Guardrails* (see 4.5)—Place the wedge block shown in Fig. 1 into any opening in the rigid bed structure below the level of any opening of the guardrail, tapered side first, and in the most adverse orientation, and gradually apply a 33-lbf (148-N) force in a direction perpendicular to the plane of the opening. Sustain the force for a period of 1 min.

5.6 *Bed End Structure* (see 4.6):

5.6.1 Place the wedge block shown in Fig. 1 into any opening, tapered side first, and in the most adverse orientation. Determine if the wedge block can pass freely through the opening.

5.6.2 *Lower Bunk End Structure* (see 4.6.3):

5.6.2.1 Without a mattress or foundation on the lower bunk, place the wedge block shown in Fig. 1 into any opening, tapered side first, in the most adverse orientation. Determine if the wedge block can pass freely through the opening. If the wedge block passes freely through the opening, determine if a 9 in. (230 mm) diameter rigid sphere can pass freely through the opening.

5.6.2.2 With the manufacturer's recommended maximum thickness mattress and foundation in place, repeat the test in 5.6.2.1.

5.6.2.3 Insert the “A” section of the test template shown in Fig. 3, Test Probe for Neck Entrapment (see Federal Register, Vol 64, No. 245, Weds., Dec. 22, 1999, p. 71903) into the portion of the boundary of the opening to be tested, with the plane of the template in the plane of the opening and with the centerline of the top of the template aligned parallel to the centerline of the opening, until motion is stopped by contact between the test template and the boundaries of the opening (see Fig. 4, Motion of Test Probe Arrested by Simultaneous Contact, Federal Register, Vol 64, No. 245, Weds., Dec. 22, 1999, p. 71904.). By visual inspection, determine if there is simultaneous contact between the boundary of the opening and both sides of the “A” section of the template. If simultaneous contact occurs, mark the contact points on the boundary of the opening and conduct the additional test described in 5.6.2.4.

5.6.2.4 Place the neck portion of the “B” section of the template into the opening, with its plane perpendicular to both

the plane of the opening and the centerline of the opening (see Fig. 2). If the neck portion of the “B” section of the template completely enters the opening (passes 0.75 in. or more beyond the points previously contacted by the “A” section of the template), the opening fails the test, unless its lower boundary slopes downward at 45° or more for the whole distance from the narrowest part of the opening the neck can reach to the part of the opening that will freely pass a 9-in. diameter sphere.

5.7 Metal Beds—Frame and Fastenings:

5.7.1 For testing in accordance with 5.7.1.1, the bed shall be prevented from sliding in a manner that does not prevent changes of angle that may take place in the bed structure.

5.7.1.1 Position a test load of 165 lb (75.0 kg) at the center of the upper foundation support system on an area not to exceed 12 in. (300 mm) square (if foundation support systems will not permit the test load to be so positioned, it is permissible to add a platform to support the test load in such a

⚠ WARNING

To help prevent serious or fatal injuries from entrapment or falls:

- Never allow a child under 6 years on upper bunk.
- Use only mattress which is 74”–75” long and 37½”–38½” wide on upper bunk.
- Ensure thickness of mattress and foundation combined does not exceed _____” and mattress is at least 5” below upper edge of guardrails.
- Use guardrails on both sides of upper bunk.
- Prohibit horseplay on or under bed(s).
- Prohibit more than one person on upper bunk.
- Use ladder for entering and leaving upper bunk.

DO NOT REMOVE THIS LABEL

(a)

⚠ WARNING

To help prevent serious or fatal injuries from entrapment or falls:

- Never allow a child under 6 years on upper bunk.
- Use only mattress which is 74”–75” long and 37½”–38½” wide on upper bunk.
- Ensure thickness of mattress does not exceed _____” and mattress is at least 5” below upper edge of guardrails.
- Use guardrails on both sides of upper bunk.
- Prohibit horseplay on or under bed(s).
- Prohibit more than one person on upper bunk.
- Use ladder for entering and leaving upper bunk.

DO NOT REMOVE THIS LABEL

(c)

⚠ WARNING

To help prevent serious or fatal injuries from entrapment or falls:

- Never allow a child under 6 years on upper bunk.
- Use only mattress meeting the following specifications on upper bunk:

Bed Type	Length	Width
Standard Length	74”–75”	37½”–38½”
Extra Long	79”–80”	37½”–38½”

- Ensure thickness of mattress and foundation combined does not exceed _____” and mattress is at least 5” below upper edge of guardrails.
- Use guardrails on both sides of upper bunk.
- Prohibit horseplay on or under bed(s).
- Prohibit more than one person on upper bunk.
- Use ladder for entering and leaving upper bunk.

DO NOT REMOVE THIS LABEL

(b)

⚠ WARNING

To help prevent serious or fatal injuries from entrapment or falls:

- Never allow a child under 6 years on upper bunk.
- Use only mattress meeting the following specifications on upper bunk:

Bed Type	Length	Width
Standard Length	74”–75”	37½”–38½”
Extra Long	79”–80”	37½”–38½”

- Ensure thickness of mattress does not exceed _____” and mattress is at least 5” below upper edge of guardrails.
- Use guardrails on both sides of upper bunk.
- Prohibit horseplay on or under bed(s).
- Prohibit more than one person on upper bunk.
- Use ladder for entering and leaving upper bunk.

DO NOT REMOVE THIS LABEL

(d)

FIG. 2 Warning Labels

way as to not increase the structural integrity of the bed). Apply an alternate force of 67 lbf (300 N) for 10 000 cycles at each point in the order ABCD or AB followed by CD at a rate not more than 24 loads per minute (see Fig. 3). The points for applying the test forces shall be located as near the center of the vertical bunk bed support as practicable at the height of the upper foundation support system.

5.7.2 After testing in accordance with 5.7.1.1, remove the 165-lb (75.0-kg) load and apply a 67-lbf (300-N) force in directions most likely to cause separation between the end structure and foundation support system. The force shall be applied at each point of attachment of the foundation support system to the end structure (point of applications shall be as close as practical to the point of attachment). The force shall be applied to either the end structure or foundation support system, whichever appears most likely to cause separation.

5.8 *Cross-Member Spacing*—Place the wedge block shown in Fig. 1 into any opening tapered side first, and with the 3.5-in. dimension perpendicular to the cross-members. Determine if the wedge block cannot pass freely through the opening. If the wedge block can pass freely through the opening, the 9-in. diameter rigid sphere must pass freely through the opening.

6. Marking and Labeling

6.1 There shall be a permanent label or marking on each bunk bed set to enable a consumer to identify the name, city, state, and zip code of the manufacturer, distributor, or seller and the month, model number, and year of manufacture.

6.2 Warnings:

6.2.1 The warning label requirements for beds not containing a mattress foundation as an integral part of the structure are addressed in 6.2.1.1. The warning label requirements for beds containing a mattress foundation as an integral part of the structure are addressed in 6.2.1.2. Although the wording contained in the warnings shall not deviate from that shown in the referenced figures, either in content or size (6.2.2), the size and shape of the label is not specified. The label may be configured to best fit the size and shape of the upper bed end structure. The warning labels shown in the referenced figures provide dimensions for twin and twin extra-long mattresses. If a bed is designed to use other than a twin or a twin extra-long mattress on the upper bunk, the label shall contain sizes appropriate to that mattress as defined in the *ISPA Voluntary*

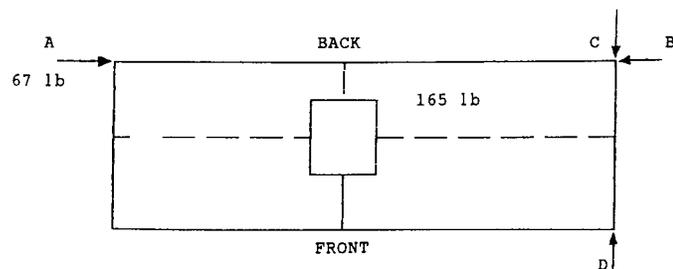


FIG. 3 Points for Applying Test Forces

Dimensional Guideline for Bedding Products and Components.⁴

6.2.1.1 If the foundation is not an integral part of the bed structure, the warning label shown in either Fig. 2 (a) or Fig. 2(b) shall be attached permanently to the inside of a bed end structure of the upper bunk in a location that cannot be covered by the bedding but that may be covered by the placement of a pillow.

6.2.1.2 If the foundation is an integral part of the bed structure, the warning label shown in either Fig. 2(c) or Fig. 2(d) shall be attached permanently to the inside of a bed end structure of the upper bunk in a location that cannot be covered by the bedding but that may be covered by the placement of a pillow.

6.2.2 The letters of the word *warning* shall be in uppercase boldface type not less than $\frac{3}{16}$ in. (5 mm) high. The letters of the words *do not remove this label* shall be in uppercase boldface type not less than $\frac{1}{8}$ in. (3 mm) high. The remainder of the text of the label shall be no less than $\frac{1}{8}$ in. high with the words *to help prevent* in boldface type.

6.2.3 Warnings, including applicable mattress dimensional specifications, shall appear on the carton containing bed ends on at least one face and one end. The letters shall be not less than $\frac{3}{16}$ in. (5 mm) high.

7. Instructional Literature

7.1 Printed instructions shall accompany each bunk bed set including, as a minimum, the following information:

7.2 *Parts List*—All parts necessary to assemble the bunk bed set shall be listed, together with the tools necessary for its assembly.

7.3 *Assembly Instructions*, containing detailed diagrams showing exactly how the bed should be assembled, including specific instructions pertaining to the following:

- 7.3.1 Bed end structures,
- 7.3.2 Attachment of side rails,
- 7.3.3 Installation of the mattress/foundation support system,
- 7.3.4 Fit of upper bunk to lower bunk,

7.3.5 Attachment of guardrails. If the bunk bed will be placed next to the wall, the guardrail that runs the full length of the bed should be placed against the wall to prevent entrapment between the bed and wall.

7.3.6 Attachment of ladder.

7.4 *Size of Mattress and Foundation*—The size of the intended mattress shall be clearly stated. The dimensions for length and width may be stated numerically or may be stated in conventional terms, for example, twin size, twin extra long, and the like. In addition, the maximum thickness of the mattress that will ensure conformance to the guardrail provision of 4.5.3 shall be stated.

7.5 *Replacement Parts*—Replacement parts, including additional guardrails, may be obtained from any of our (insert manufacturer's name) dealers.

7.6 *Safety Warnings*—The instructions shall contain the following warning information:

⁴ International Sleep Products Assn., 333 Commerce Street, Alexandria, VA 22314.

7.6.1 Follow the information on the warnings appearing on the upper bunk end structure and on the carton. Do not remove warning label from bed.

7.6.2 Always use the recommended size mattress or mattress support, or both, to help prevent the likelihood of entrapment or falls.

7.6.3 Surface of mattress must be at least 5 in. (127 mm) below the upper edge of guardrails.

7.6.4 Do not allow children under 6 years of age to use the upper bunk.

7.6.5 Periodically check and ensure that the guardrail, ladder, and other components are in their proper position, free from damage, and that all connectors are tight.

7.6.6 Do not allow horseplay on or under the bed and prohibit jumping on the bed.

7.6.7 Always use the ladder for entering and leaving the upper bunk.

7.6.8 Do not use substitute parts. Contact the manufacturer or dealer for replacement parts.

7.6.9 Use of a night light may provide added safety precaution for a child using the upper bunk.

7.6.10 Always use guardrails on both long sides of the upper bunk. If the bunk bed will be placed next to the wall, the guardrail that runs the full length of the bed should be placed against the wall to prevent entrapment between the bed and wall.

7.6.11 The use of water or sleep flotation mattresses is prohibited.

7.6.12 Keep these instructions for future reference.

8. Keywords

8.1 bunk beds; children's furniture; guardrails; ladders; mattress support

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