



UNITED STATES GENERAL ACCOUNTING OFFICE

WASHINGTON, D C 20548

CIVIL DIVISION

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JUL 28 1971

Dear Dr. Branscomb:

We have completed a survey of consumer protection and safety programs being conducted by the National Bureau of Standards. The survey was performed primarily at the Bureau's headquarters in Gaithersburg, Maryland. The survey included the gathering of information on the following programs: Flammable Fabrics, Motor Vehicle Safety, Fair Packaging and Labeling, Fire Research and Safety, and Product Safety. Although we do not intend to review any of the programs in further detail at this time, we wish to take the opportunity to present our views on one aspect of the Flammable Fabrics Program.

In reviewing the progress of the program under the Flammable Fabrics Act, we noted that no standard or other regulation for wearing apparel has become effective during the three and one-half years that have followed passage of amendments to the Act in December 1967. The Department of Commerce issued findings, however, that standards or other regulations might be needed for wearing apparel in general in October 1968 and for certain items of children's wearing apparel in January 1970. Standards or other regulations have not been proposed as a result of the October 1968 finding, but a proposed standard for children's sleepwear was published in November 1970. Public comments have since been received as a prelude to the possible issuance of a final standard which will normally become effective twelve months after promulgation by the Secretary of Commerce.

The Congressional committees, to whom the bill for amending the Act was referred, reported in 1967 that victims of wearing apparel burns are very largely concentrated among the very young and the aged. The Department, however, did not find a possible need for children's wearing apparel standards, as a basis for institution of proceedings, until January 1970 and has not yet found a possible need for standards for wearing apparel of the aged. The January 1970 issuance was based on the Bureau's analysis of 254 cases reported by the Department of Health, Education, and Welfare.

Our discussions with Bureau personnel and reviews of Congressional hearings indicate that a major impediment to more timely development of standards is the position taken within the Department that the need for standards must be strongly supported by statistically

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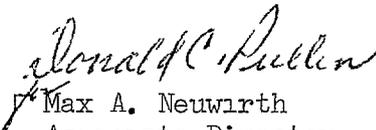
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valid case data and that such data has not heretofore been provided by the Department of Health, Education, and Welfare. We agree that such statistical data is vital to the satisfactory accomplishment of the purposes of the Act. Until such time as adequate data is made available, however, we believe that laboratory research, based on existing case data and on the more common exposures of wearing apparel to ignition sources, should be utilized to determine unreasonable risk and develop initial standards or other regulations under the Act. Considering the obvious hazards which the wearing apparel of children and the aged entail, for example, it seems that laboratory research could possibly have been concentrated earlier on the development of "first-generation" standards for such wearing apparel as in the case of carpets and rugs.

We appreciate the cooperation extended to our representatives during the review. We plan no further reporting on the results of our survey; however, information obtained which related to other agencies may be used in subsequent reviews of those agencies. It is possible that Bureau officials may be contacted during these reviews.

Copies of this letter are being sent to the Assistant Secretary for Administration and to the Director, Office of Audits, Department of Commerce.

Sincerely yours,


Max A. Neuwirth
Associate Director

Dr. Lewis M. Branscomb, Director
National Bureau of Standards
Department of Commerce

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