

## Consumer Federation of America · Consumers Union

### Kids in Danger · Public Citizen · U.S. Public Interest Research Group

February 7, 2012

Andrew J. Kameros,  
Assistant Executive Director  
Office of Compliance and Field Operations  
U.S. Consumer Product Safety Commission  
4330 East West Highway  
Bethesda, MD 20814

Dear Mr. Kameros,

As representatives of public health and consumer safety organizations, we write to express our serious concerns about Bumbo International's Baby Seat. While it has proven to be a popular product that helps babies to sit up before they are developmentally able to do so, its safety record raises serious concerns.

In 2007, Bumbo International working with the U.S. Consumer Product Safety Commission (CPSC), recalled the baby seat, after 28 reported injuries from the product. Three of these injuries were skull fractures in babies between the ages of 3 to 10 months, resulting from the chair being used on elevated surfaces, such as a table. Bumbo International cooperated with the voluntary recall and agreed to add a special warning instruction on the chair, "WARNING - Never use on a raised surface. Never use as a car seat or bath seat. Designed for floor level use only. Never leave your baby unattended as the seat is not designed to be totally restrictive and may not prevent release of your baby in the event of vigorous movement."

However, subsequent injury reports caused CPSC to issue another warning for the product this past November. CPSC is now aware of 33 skull fractures. According to CPSC data there have been 95 additional injuries since the 2007 recall. Fifty of these injuries occurred while the product was used on the floor as recommended or its use position was unclear. There are two recent postings to SaferProducts.gov listing injuries from the product as well. Warning labels have generally been shown to be ineffective in reducing injuries and that is specifically evident with this product as well.

Because serious injuries are occurring when this product is used as intended, and since these injuries involve an alarming number of skull fractures we have grave concerns about the safety of Bumbo International's Baby Seat. Unlike other products intended for the same age range such as bouncers and stationary activity centers, there are no safety standards or testing requirements covering this type of product. In addition, manufacturers of similar

products have made design changes to address the safety concerns associated with these types of products– a step Bumbo International has refused to take to date.

Our organizations urge CPSC to issue a recall of Bumbo International’s Baby Seat to remove these potentially hazardous products from the market and to allow the manufacturer to address the serious safety concerns in the future.

Sincerely,

Nasima Hossain  
Public Health Advocate  
U.S. PIRG  
202-461-3826  
nhossain@pirg.org

Nancy Cowles  
Executive Director  
Kids in Danger  
312/595-0649  
nancy@kidsindanger.org

Rachel Weintraub  
Director of Product Safety & Senior Counsel  
Consumer Federation of America  
202/939-1012  
rweintraub@consumerfed.org

Ami Gadhia  
Senior Policy Counsel  
Consumers Union  
202/462-6262  
agadhia@consumer.org

Christine Hines  
Consumer and Civil Justice Counsel  
Public Citizen  
202/454-5135  
chines@citizen.org