



## Public Comment No. 13-NFPA 260-2021 [ Section No. 1.1 ]

### 1.1 Scope.

#### 1.1.1\*

The tests described in this document apply to upholstered furniture components that are tested in a standard, defined composite.

#### 1.1.2

These tests shall apply to cover fabrics, interior fabrics, welt cords, decking materials, barrier materials, and filling/padding materials including, but not limited to, battings of natural or man-made fibers, foamed or cellular filling materials, resilient pads of natural or man-made fibers, and loose particulate filling materials such as shredded polyurethane foam or feathers and down.

I see no better place to make this comment – I propose serious discussion regarding the need for another furniture smolder test and believe that NFPA's time can be better spent on more pertinent subjects.

## Statement of Problem and Substantiation for Public Comment

I see no better place to make this comment – I propose serious discussion regarding the need for another furniture smolder test and believe that NFPA's time can be better spent elsewhere. The new CPSC (Title XXI...) furniture flammability standard should suffice. Its existence certainly threatens the future usefulness of NFPA 260, UFAC, and ASTM 1353. Continuing these somewhat redundant standards - which serve little functional purpose - contributes to misunderstanding of the newly enacted federal program.

UFAC has discontinued use of its 35+ year old smolder standard, though the welt cord test continues alongside the new federal furniture flammability standard (a.k.a. TB117-2013) in the UFAC test program.

### Related Item

- none available

## Submitter Information Verification

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**Submittal Date:** Fri Oct 22 13:54:47 EDT 2021  
**Committee:** FIZ-AAA

## Committee Statement

**Committee** Rejected

**Action:**

**Resolution:** No specific language was proposed. NFPA 260 continues to be referenced in NFPA 101 and within the IFC. References to the new regulations were added in a separate annex note.



## Public Comment No. 16-NFPA 260-2021 [ Section No. 1.1.2 ]

### 1.1.2\*

These tests shall apply to cover fabrics, interior fabrics, welt cords, decking materials, barrier materials, and filling/padding materials including, but not limited to, battings of natural or man-made fibers, foamed or cellular filling materials, resilient pads of natural or man-made fibers, and loose particulate filling materials such as shredded polyurethane foam or feathers and down.

A.1.1.2 Codes that govern the use of upholstered furniture, including NFPA's Life Safety Code (NFPA 101) and the International Fire Code, reference these test methods as part of their regulations.

(Also add NFPA 101, Life Safety Code, 2021 edition, and International Fire Code (2021 edition) into the section on informational references)

### Statement of Problem and Substantiation for Public Comment

The issuance of the SOFA act which adopted CA TB 117-2013 as a national requirement for upholstered furniture materials sold in the United States does not replace the requirements contained in codes and regulations (such as those in the 2021 editions of NFPA 101 and of the IFC) for additional testing to NFPA 260.

Furthermore, neither the public inputs to the 2024 edition of NFPA 101 nor the public inputs or comments to the 2024 edition of the IFC have recommended deletion of these requirements so that they will appear in those editions as well.

#### Related Item

- pi25

### Submitter Information Verification

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**Submittal Date:** Wed Dec 29 18:11:19 EST 2021

**Committee:** FIZ-AAA

### Committee Statement

**Committee Action:** Rejected but see related SR

**Resolution:** SR-1-NFPA 260-2022

**Statement:** The issuance of the new regulations which adopt CA TB 117-2013 as the national requirement for upholstered furniture do not replace the requirements found in codes and regulations such as NFPA 101 or the IFC for additional testing to NFPA 260.



## Public Comment No. 15-NFPA 260-2021 [ Section No. 1.2 ]

### 1.2 Purpose.

#### 1.2.1

The test methods in this document are designed to evaluate the ignition resistance of upholstered furniture when it is exposed to smoldering cigarettes under specified conditions.

#### 1.2.2

It is the intent of this standard to provide tests to determine whether covered upholstered furniture components, such as cover fabrics, welt cords, decking materials, interior fabrics, and filling/padding materials, are relatively resistant to ignition by smoldering cigarettes.

#### 1.2.3—\*

This standard establishes a classification system for determining the resistance of upholstered furniture components to cigarette ignition.

#### 1.2.4

For the purposes of this standard, materials are designated Class II unless they are demonstrated to be Class I using the test methods in this document.

A.1.2.3 The use of a barrier classified by this test method as a Class I-type barrier between a cover fabric or a padding material classified as a Class -II type material is not sufficient to ensure that the resulting upholstered furniture assembly will exhibit appropriate ignition resistance of the upholstered furniture item when it is exposed to smoldering cigarettes.

## Statement of Problem and Substantiation for Public Comment

The addition of section 1.2.4 clarifies that the results of testing to the new edition of NFPA 260 will produce one of two results: either the material is a Class I material (which means it passed the test) or it is a Class II material (which means it failed the test). The old section A.1.2.3 stated as shown below and did not make it clear that this test is really a pass/fail test. That was the intent of stating that cover fabrics that failed the test (i.e. Class II ones) should not be used when constructing furniture intended to be resistant to cigarette ignition.

"Old A.1.2.3 Cover fabrics determined to be Class II by this test should not be used in the manufacture of furniture intended to be resistant to cigarette ignition without a Class I-type barrier. Barrier materials also are classified by this test. Any other components determined to be Class II by this test should not be used in the manufacture of furniture intended to be resistant to cigarette ignition."

This public comment suggests it might be worth explaining further that the resistance to cigarette ignition can be improved by using a Class I barrier material, but that the use of such a barrier does not ensure that the furniture will be resistant to cigarette ignition, and that is being proposed here. This brings back some of the intent of the information originally in A.1.2.3.

### Related Item

- fr2

## Submitter Information Verification

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**Submittal Date:** Wed Dec 29 17:51:40 EST 2021

**Committee:** FIZ-AAA

## Committee Statement

**Committee Action:** Rejected but see related SR

**Action:**

**Resolution:** [SR-5-NFPA 260-2022](#)

**Statement:** The addition of section 1.2.4 clarifies that the results of testing to the new edition of NFPA 260 will produce one of two results: either the material is a Class I material (which means it passed the test) or it is a Class II material (which means it failed the test). The old section A.1.2.3 stated as shown below and did not make it clear that this test is really a pass/fail test. That was the intent of stating that cover fabrics that failed the test (i.e. Class II ones) should not be used when constructing furniture intended to be resistant to cigarette ignition.

"Old A.1.2.3 Cover fabrics determined to be Class II by this test should not be used in the manufacture of furniture intended to be resistant to cigarette ignition without a Class I-type barrier. Barrier materials also are classified by this test. Any other components determined to be Class II by this test should not be used in the manufacture of furniture intended to be resistant to cigarette ignition."

This public comment suggests it might be worth explaining further that the resistance to cigarette ignition can be improved by using a Class I barrier material, but that the use of such a barrier does not ensure that the furniture will be resistant to cigarette ignition, and that is being proposed here. This brings back some of the intent of the information originally in A.1.2.3.



## Public Comment No. 6-NFPA 260-2021 [ Section No. 2.3.1 ]

### 2.3.1 ASTM Publications.

ASTM International, 100 Barr Harbor Drive, P.O. Box C700, West Conshohocken, PA 19428-2959. [www.astm.org](http://www.astm.org)

ASTM D737, *Standard Test Method for Air Permeability of Textile Fabrics*, 2018.

ASTM D3574, *Standard Test Methods for Flexible Cellular Materials — Slab, Bonded, and Molded Urethane Foams*, 2017.

addition:

ASTM E1353-08a Standard Test Methods for Cigarette Ignition Resistance of Components of Upholstered Furniture

### Statement of Problem and Substantiation for Public Comment

Since ASTM E1353-08a is a much referenced protocol document in TITLE XXI—COVID-19 REGULATORY RELIEF AND WORK FROM HOME SAFETY ACT and California Technical Bulletin 117-2013. It should be included in this list of associated publications.

#### Related Item

- new ASTM reference

### Submitter Information Verification

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**Submittal Date:** Fri Oct 22 10:31:27 EDT 2021  
**Committee:** FIZ-AAA

### Committee Statement

**Committee Action:** Rejected  
**Resolution:** ASTM E1353 is not referenced within NFPA 260.



## Public Comment No. 7-NFPA 260-2021 [ Section No. 2.3.3 ]

### 2.3.3 Other Publications.

*Merriam-Webster's Collegiate Dictionary*, 11th edition, Merriam-Webster, Inc., Springfield, MA, 2003.

additions:

[California Technical Bulletin 117-2013](#)

[TITLE XXI—COVID—19 REGULATORY RELIEF AND WORK FROM HOME SAFETY ACT](#)

### Statement of Problem and Substantiation for Public Comment

Not sure where these two standards fit but they should be referenced in the revised NFPA 260.

California Technical Bulletin 117-2013

TITLE XXI—COVID—19 REGULATORY RELIEF AND WORK FROM HOME SAFETY ACT

#### Related Item

- more references suggested

### Submitter Information Verification

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**Submittal Date:** Fri Oct 22 10:37:14 EDT 2021  
**Committee:** FIZ-AAA

### Committee Statement

**Committee Action:** Rejected  
**Resolution:** Neither proposed document is referenced in the body of this standard. New annex material was added and the references to those documents was added to Annex C.



## Public Comment No. 5-NFPA 260-2021 [ Section No. 3.3 ]

### 3.3 General Definitions.

#### 3.3.1 Barrier/Barrier Fabric.

The fabric or other material placed directly under the cover fabric when Class II cover fabric is used.

#### 3.3.2 Char.

Carbonaceous material formed by pyrolysis or incomplete combustion.

#### 3.3.3 Filling Direction.

In woven fabrics, that direction perpendicular to the warp direction.

#### 3.3.4 Ignition.

Continuous, self-sustaining, smoldering combustion of upholstered furniture substrates after exposure to burning cigarettes.

#### 3.3.5\* Machine Direction.

In the case of nonwoven or film-type materials, that direction parallel to the longest dimension of the roll goods.

#### 3.3.6 Sample.

Material being tested.

#### 3.3.7 Selvedge.

The outermost edge of the width of the fabric.

#### 3.3.8 Specimen.

Individual pieces of a sample used in a single test assembly.

#### 3.3.9 Warp Direction.

In woven textiles, that direction on the roll of fabric that is parallel to the selvages.

#### 3.3.10 \_ Welt. Cord

**The cord or piping sewn into the seam or border edge of a cushion, pillow, arm, or back of a furniture item.**

**additions:**

#### **3.3.11 Component**

**For purposes of clarification, a component will be one of the test subjects - cover fabric, interior fabric, welt cord, filling or padding, decking material, barrier material.**

#### **3.3.12 Cover fabric**

**textile, leather or other product used to encompass the outer surfaces, excluding furniture bottom, of upholstered furniture.**

## Statement of Problem and Substantiation for Public Comment

"Welt cord" is the term used within the upholstered furniture business and within NFPA 260. Welt is not a common term.

The term "material," used alone often within NFPA 260, is too generic. The terms "material," "cover



fabric," "cover," "fabric" and "component" are often used interchangeably. Example: see conflicting terms in 7.1.1 versus 7.1.2. Either add a definition for "material" as used in 1.2.4 (or discontinue its use by referring to "components").

Strong consideration should also be given to the addition of a definition for "material" as used in 1.2.4 (or discontinue its use by referring to "components"). The terms material, cover fabric, and component are often used interchangeably. Example: see conflicting terms in 7.1.1 versus 7.1.2.

The two new terms - "component" and "cover fabric" (which would, by definition, include leather) - help to clarify any confusion created by "material."

#### Related Item

- clarification of terms used to describe furniture parts to be tested

### Submitter Information Verification

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**Submittal Date:** Wed Oct 13 15:33:34 EDT 2021  
**Committee:** FIZ-AAA

### Committee Statement

**Committee Action:** Rejected but see related SR  
**Resolution:** [SR-6-NFPA 260-2022](#). Additionally, see SR related to the definition of Welt Cord. The definition of "component" was not added as this is a commonly understood term.  
**Statement:** Cover fabrics are specimens being tested and a definition is helpful.



## Public Comment No. 8-NFPA 260-2021 [ Section No. 3.3.10 ]

### 3.3.10 Welt Cord .

The cord or piping sewn into the seam or border edge of a cushion, pillow, arm, or back of a furniture item.

## Statement of Problem and Substantiation for Public Comment

consistency:

The product is called welt cord in the furniture industry and throughout most of NFPA 260-2019 and in other associated documents such as the UFAC guidelines.

Calling it "cord" would be more appropriate than using "welt" alone.

### Related Item

- proper terminology

## Submitter Information Verification

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**Committee:** FIZ-AAA

## Committee Statement

**Committee Action:** Accepted  
**Resolution:** SR-7-NFPA 260-2022  
**Statement:** The product is called welt cord in the furniture industry and throughout most of NFPA 260-2019 and in other associated documents such as the UFAC guidelines.



## Public Comment No. 9-NFPA 260-2021 [ Section No. 4.3 ]

### 4.3\* Ignition Source.

The ignition source for the test shall be SRM 1196 cigarettes without filter tips made from natural tobacco, 83 mm  $\pm$  2 mm long, with a tobacco packing density of 0.270 g/cm<sup>3</sup>  $\pm$  0.020 g/cm<sup>3</sup>, and a total weight of 1.1 g  $\pm$  0.1 g.

The current version of SRM 1196 series cigarettes shall be used, unless packing density and/or weight (mass) vary by more than 5% and/or changes in other critical dimensions or smolder performance. A change by NIST of this magnitude will initiate action by NFPA to accept or decline the new ignition source.

No issues with use of mass vs weight.

**PI:** 4.3\* Ignition Source.

In the section, the cigarette is identified by "weight" but should be identified by "mass".

The ignition source for the test shall be consist of the current supply of SRM 1196 series cigarettes without filter tips made from natural tobacco, 83 mm  $\pm$  2 mm long, with a tobacco packing density of 0.270 g/cm<sup>3</sup>  $\pm$  0.020 g/cm<sup>3</sup>, and a total ~~weight of~~ mass of 1.1 g  $\pm$  0.1 g.

## Statement of Problem and Substantiation for Public Comment

NIST should not have carte blanche to change the standard cigarette without question. NFPA should have a say in any future versions, including the use of other cigarettes and other ignition sources.

### Related Item

- standard cigarette qualifications

## Submitter Information Verification

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**Submittal Date:** Fri Oct 22 10:43:33 EDT 2021  
**Committee:** FIZ-AAA

## Committee Statement

**Committee Action:** Rejected

**Resolution:** It was difficult for many testing labs and manufacturers to find alternatives during the shortages, however there are no other available alternatives to the SRM produced by NIST. They are not produced by other manufacturers.



## Public Comment No. 10-NFPA 260-2021 [ Section No. 6.2.8.1 ]

### 6.2.8.1

If a cigarette extinguishes before burning through its entire length, a fresh cigarette shall be placed on a new test assembly and covered with sheeting fabric until one of the following occurs:

- (1) Three cigarettes burn through their entire lengths on three individual test specimens.
- (2) Three cigarettes self-extinguish on the sample.

In the 6.2.8.1(2) scenario, the test could conclude “when three cigarettes extinguish on the sample.” If there’s additional instruction regarding the Classification of these unusual performance, it is not obvious. Is char length measured? Does this cover fabric meet Class I or Class II status or does testing start anew?

There is an inconsistency in how to proceed when the cigarette goes out in the middle of a test. In 6.1.8.1, 6.5.6.1, and 6.6.7.1, it says that “... a fresh cigarette shall be placed on a fresh area of the test assembly.” In 6.2.8.1, 6.3.8.1, and 6.4.7.1, it says that “... a fresh cigarette shall be placed on a new test assembly.” As a minimum, there should be a section in the Commentary that explains the rationale for the difference. There also needs to be a definition of a “fresh area.” The frame width is 203 mm, and the cigarette length is 83 mm. The initial cigarette is centered along the crevice, so the crevice length on either side of the original cigarette is only 60 mm. The decking material tester has some available space for a second test cigarette but lacks guidance as to where it can/cannot be placed. The Task Group suggests the uniform use of a fresh test assembly. That is the change proposed in this PI.

Although it could mean that a lab might go through more than 6 sets of test specimen, it’s unwise to re-test the same sample that already has a charred area. If, however, the cigarette expired within the first inch, an argument could be made for retesting the same mockup.

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## Statement of Problem and Substantiation for Public Comment

Although it could mean that a lab might go through more than 6 sets of test specimen, it’s unwise to re-test the same sample that already has a charred area. If, however, the cigarette expired within the first inch, an argument could be made for retesting the same mockup.

In the 6.2.8.1(2) scenario, the test could conclude “when three cigarettes extinguish on the sample.” If there’s additional instruction regarding the Classification of these unusual performance, it is not obvious. Is char length measured? Does this cover fabric meet Class I or Class II status or does testing start anew?

### Related Item

- • extinguishing cigarette procedure clarification

## Submitter Information Verification

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**Submittal Date:** Fri Oct 22 10:52:29 EDT 2021  
**Committee:** FIZ-AAA

### Committee Statement

**Committee Action:** Rejected

**Resolution:** The new language within NFPA 260 does what the submitter of the PC is requesting- requires a new specimen each time.



## Public Comment No. 11-NFPA 260-2021 [ Section No. 7.3 ]

### 7.3 Maximum Char Length.

The maximum vertical char lengths for upholstered furniture components shall be as follows:

- (1) Cover fabrics: < 45 mm
- (2) Interior fabrics: < 38 mm
- (3) Welt cords: < 38 mm
- (4) Fillings or paddings: < 38 mm
- (5) Decking materials: < 38 mm (**for decking material, char length shall be measured from the original position of each cigarette, not vertically as described in 7.3).**)
- (6) Barrier materials: < 38 mm

### Statement of Problem and Substantiation for Public Comment

Vertical char does not exist and is not measured in the Decking Material test.

#### Related Item

- correction of char length determination for decking material test

### Submitter Information Verification

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**Submittal Date:** Fri Oct 22 11:14:44 EDT 2021  
**Committee:** FIZ-AAA

### Committee Statement

**Committee Action:** Rejected but see related SR  
**Resolution:** [SR-12-NFPA 260-2022](#)  
**Statement:** Decking materials use a different test procedure than the other materials and have no vertical component in the test. This revision is to remove decking materials from the list and add a new section describing the appropriate method below.



## Public Comment No. 12-NFPA 260-2021 [ New Section after 7.4 ]

[see Statement of Problem and Substantiation for Public Comment](#)

### Statement of Problem and Substantiation for Public Comment

Concern for significant changes in NFPA 260 protocol;

Well aware that California TB117 was based on weight loss percentage, UFAC established char length as its classification criteria in 1979. The decision to use char length, according to retired UFAC founder Joe Ziolkowski who was one of the UFAC test originators, was to make the protocol more user-friendly for furniture manufacturers and component suppliers who wanted to run the tests themselves. Char length, Ziolkowski said in a July 2021 phone conversation, is simpler to understand and measure than precise weight measurements and loss calculations. Postage scales, typically the only scale found in a furniture company and located in mailrooms, are not accurate enough for precise weight measurement.

The original c1975 TB117 standard test fabric differs significantly from the UFAC Type I standard test fabric. The Bureau chose a relatively thick cotton velvet material that was commonly used at the time to line violin cases. in c1979, UFAC chose a cotton mattress ticking that appeared to promote smolder moreso than its California counterpart.

The original TB117's spec for Standard Fabric was 100% cotton velvet, 14.5 oz per lineal (54") foot, no backcoating. The 117 fabric is not pre-washed.

As is UFAC's, NFPA 260's Standard Type I Cover Fabric is 100 percent cotton mattress ticking conforming to Federal Specification CCC.C.436.D. This Standard Type I cover fabric shall be laundered and tumble-dried before use. (Sections 4.4.1 and 4.4.2).

Though weight (mass) loss was used in California TB117 for years, the significant difference in standard test fabrics between the two protocols provides no justification for mass loss determination, even as an option, in NFPA 260.

Based on the Bureau's developmental research and testing four decades ago, California TB117's Section D-Part I Resilient Filling Materials- Cigarette Resistance test, utilizing the standard cotton velvet fabric, set weight (mass) loss classification determination point at 20% loss (80% weight retention). How will test results of the proposed 10% maximum mass loss with a more smolder-prone standard cotton mattress ticking compare to result from the old TB117 smolder test and the old UFAC smolder test?

Mass loss has not been shown by submitter to be any more helpful or precise in classifying materials/components than char length.

Lower density foams and other resilient filling materials, because they do not have as much weight to lose, would suffer discrimination in comparison to higher density materials. Most detrimental to component producers, furniture manufacturers and fire researchers would be the introduction of new criteria with no prior and/or comparative history. This is an extremely onerous suggested change with no supporting data! Changing weigh loss criteria and standard test fabric within NFPA protocol would create a reset of many - if not most - upholstery components and their design for compliance. And let's not forget the 2019 change in sample thickness from 2" to 3". How does that work with 20% weight loss and a different standard fabric?

[Related  
Item](#)



- concern that NFPA 260 is being hi-jack for purposes other than intended furniture smolder-ignition testing

## Submitter Information Verification

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**Submittal Date:** Fri Oct 22 13:32:36 EDT 2021  
**Committee:** FIZ-AAA

## Committee Statement

**Committee Action:** Rejected  
**Resolution:** No language/suggested revisions to the standard were provided for the TC to consider. However, a SR was developed on adding clarification on the TB 117 subject.



## Public Comment No. 14-NFPA 260-2021 [ Section No. C.1.2.1 ]

### C.1.2.1 ASTM Publications.

ASTM International, 100 Barr Harbor Drive, P.O. Box C700, West Conshohocken, PA 19428-2959.

ASTM E691, *Standard Practice for Conducting an Interlaboratory Study to Determine the Precision of a Test Method*, 2019e1, 2020

ASTM E1353, *Standard Test Methods for Cigarette Ignition Resistance of Components of Upholstered Furniture*, -2016, 2021.

ASTM E2187, *Standard Test Method for Measuring the Ignition Strength of Cigarettes*, 2020a.

## Statement of Problem and Substantiation for Public Comment

date updates

### Related Item

- fr15

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**Submittal Date:** Thu Dec 16 20:48:46 EST 2021

**Committee:** FIZ-AAA

## Committee Statement

**Committee Action:** Accepted

**Resolution:** [SR-13-NFPA 260-2022](#)

**Statement:** Updates to referenced standards.



## Public Comment No. 3-NFPA 260-2021 [ Section No. C.1.2.1 ]

### C.1.2.1 ASTM Publications.

ASTM International, 100 Barr Harbor Drive, P.O. Box C700, West Conshohocken, PA 19428-2959.

ASTM E691, *Standard Practice for Conducting an Interlaboratory Study to Determine the Precision of a Test Method*, 2019e1.

ASTM E1353, *Standard Test Methods for Cigarette Ignition Resistance of Components of Upholstered Furniture*, 2016.

ASTM E2187, *Standard Test Method for Measuring the Ignition Strength of Cigarettes*, 2020a.

ASTM E1353-08a, *Standard Test Methods for Cigarette Ignition Resistance of Components of Upholstered Furniture*, 2008

### Statement of Problem and Substantiation for Public Comment

Since ASTM E1353-08a is specifically referenced by California Technical Bulletin 117-2013, it should be specifically included. The 08a suffix will not alter with new TB117-2013 iterations.

#### Related Item

- specific reference related to federal (CPSC) furniture flammability standard

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**Submittal Date:** Wed Oct 13 15:23:34 EDT 2021  
**Committee:** FIZ-AAA

### Committee Statement

**Committee Action:** Rejected  
**Resolution:** ASTM E1535 is already referenced in this section.



## Public Comment No. 4-NFPA 260-2021 [ New Section after C.1.2.3 ]

### TITLE OF NEW CONTENT

Type your content here ...additional reference material:

California Technical Bulletin 117-2013

TITLE XIX- Covid-19 Regulatory Relief and Work From Home Safety Act (U.S. CPSC requirements for upholstered furniture flammability)

### Statement of Problem and Substantiation for Public Comment

Reference to the following standards should not be omitted in NFPA 260:

California Technical Bulletin 117-2013

TITLE XIX- Covid-19 Regulatory Relief and Work From Home Safety Act (U.S. CPSC requirements for upholstered furniture flammability)

#### Related Item

- applicable standards reference

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**Submittal Date:** Wed Oct 13 15:27:26 EDT 2021  
**Committee:** FIZ-AAA

### Committee Statement

**Committee Action:** Rejected  
**Resolution:** See separate SR on new annex material to add reference to these standards.