

U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

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Chris M. Cox, President
Protective Headgear Manufacturers Association
1333-30th Street
San Diego, CA 92154

Dear Mr. Cox:

This is in response to your letter of August 1998 requesting guidance in interpreting the CPSC Safety Standard for Bicycle Helmets (16 CFR Part 1203) regarding the provision on internal helmet fixtures (§ 1203.5). The final sentence of § 1203.5 states, "There shall be no fixture on the helmet's inner surface projecting more than 2 mm into the helmet interior." Your letter states that a strict reading of the regulation would prevent a manufacturer from using comfort pads more than 2 mm thick and would prevent the use of many retention systems that have proven very effective.

The Office of Compliance, Recalls and Compliance Division, provides the following guidance for determining the compliance of interior helmet fixtures under § 1203.5.

The intent of this sentence is to prohibit fixtures inside the helmet that are potentially injurious in the event of an accident involving head impact. This generally includes hard fixtures that extend more than 2 mm in a rigid manner into the helmet's interior.

"Soft" fixtures, such as foam fit-pads or comfort-pads, do not fit this description and will not be considered to be non-complying internal fixtures.

In addition, plastic or woven material components not more than 2 mm thick that are flexible parts of the retention system and are designed to follow the contours of the head will not be considered to be non-complying internal fixtures. Examples of this are the flexible plastic straps that make up "occipital support" retention systems that improve the stability of the helmet on the wearer's head.

This interpretation is based on the information currently available to the staff. If additional facts come to our attention, the interpretation could change.

Sincerely,

James A. DeMarco