

SUPPORTING STATEMENT - PART A

Safety Standard for Clothing Storage Units OMB Control Number 3041-0191

1. Need for the Information Collection

Enacted in 2022, the STURDY law (15 U.S.C. 2056f) directs the U.S. Consumer Product Safety Commission (CPSC or Commission) to promulgate rulemaking for clothing storage units (CSUs). A CSU is defined as a “any free-standing furniture item manufactured in the United States or imported for use in the United States that is intended for the storage of clothing, typical of bedroom furniture.” Pursuant to STURDY, CPSC published a final rule in the Federal Register (88 FR 28403, May 4, 2023) that incorporates by reference ASTM F2057. The requirements are codified at 16 CFR part 1261 and include warning labels that contain certain statements and pictograms. These requirements fall within the definition of “collection of information,” as defined in 44 U.S.C. 3502(3).

2. Use of the Information

Identification and labeling requirements provide information to consumers and regulators needed to locate and recall noncomplying products. Identification and labeling requirements include content such as the name and address of the manufacturer. In addition, CSUs must contain warning labels. Warning labels or markings provide information to consumers on hazards and risks associated with product use. Section 10.2 of ASTM F2057-23 includes the warning label requirements, which include that all CSU warning labels must start with “Children have died from furniture tip over.” Figure 1 provides an example warning. This example is provided in Figure 16 of ASTM F2057-23.

Figure 1: Example Warning Label Inside Drawer (Not shown to scale)



3. Use of Information Technology

CSU labels must be permanent and marked at least in one place the CSU. They are not digital in nature. Each safety symbol panel shall measure at least 1.25 in. by 1.25 in. In addition, CPSC uses information technology appropriately for communication and information dissemination.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another source.

5. Burden on Small Businesses

Respondents include manufacturers and importers of CSUs, many of which are considered small private firms. CPSC estimates that more than 95 percent of respondents that comply with the information collection requirements are small firms.

To mitigate burden on small businesses, CPSC provides a variety of resources to help both new and experienced small businesses learn about safety requirements that apply to consumer products. These resources include the CPSC Regulatory Robot and small business education videos. Many of these resources can be accessed online at: <https://www.cpsc.gov/Business--Manufacturing/Business-Education>. In addition, a CPSC presentation on Requirements for CSUs is available on CPSC's YouTube channel, in the business guidance playlist.

6. Less Frequent Collection

Identification and labeling requirements provide important safety information to consumers. Warning labels provide information to consumers for safe CSU use. If the information is not provided, consequences would include reduced ability for consumers or regulators to identify, locate or recall noncomplying products, as well as a reduction of information on safe CSU use.¹

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

¹ On August 17, 2023, CPSC staff presented on the requirements for clothing storage units (CSUs) at 16 CFR part 1261, pursuant to STURDY. Here is a YouTube link to the CPSC webinar on requirements for CSUs: <https://youtu.be/FKU9n6bkKM4?si=o063YSYqWwejmjgJ>.

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A notice soliciting comments on the Commission's intent to request a renewal of the previously approved collection of information published to the Federal Register (FR) on November 28, 2025 (90 FR 54644). One comment in support of the collection was received. The full text of the comment received is included in the renewal package.

Part B: CONSULTATION

16 CFR part 1261.2 identifies the latest Commission-accepted version of ASTM F2057 that is mandatory. Read-only copies of ASTM standards that are incorporated by reference can be viewed at ASTM's electronic Reading Room (<https://www.astm.org/READINGLIBRARY>).

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

A Privacy Act Statement is not required for this collection because we are not requesting individuals to furnish personal information for a system of records. A System of Record Notice (SORN) is not required for this collection because records are not retrievable by PII. A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

11. Sensitive Questions

This collection does not include any questions of a sensitive nature.

12. Respondent Burden and its Labor Costs

CPSC has estimated the respondent burden in hours and the estimated labor costs to the respondent in dollars.

Part A: ESTIMATION OF RESPONDENT BURDEN

The hourly burden for labeling includes designing the label that will be used and physically attaching the label to each CSU. The hourly reporting burden imposed on firms includes the time it will take them to design and update warning labels, as well as the hourly burden of attaching them to all CSUs sold domestically. Burden estimates are presented in Table 1.

Table 1: Estimated Annual Reporting Burden

Burden Type	Number of Respondents	Frequency of Response	Total Annual Responses	Length of Response	Annual Burden (hours)
Labeling, design and update	2,122	1	2,122	60 min.	2,122
Labeling, attachment	20,103,360	1	20,103,360	.06 min.	20,103

CPSC estimates that approximately 2,122 CSU suppliers will design and update the CSU label annually.² Also, CPSC estimates that there are approximately 20,103,360 CSU units sold annually. This is a reasonable estimate of the number of labeling attachment responses per year.

CPSC estimates that it could take an hour for a supplier to design the labeling or marking for a CSU model, and that the design could be used for a period of three years, or until the CSU is redesigned. Note that this is probably an overestimate of the labeling burden, as most warning label designs will not need to be redesigned every three years.

CPSC estimates it could take 0.06 minutes (3.6 seconds or 1,000 labels per hour) for a supplier to attach the label to the CSU, for each of the 20,103,360 units sold in the United States annually. Attaching the label to the CSU would amount to an hourly burden of 20,103 hours [(0.06 min × 20,103,360 CSUs) / 60 mins per hour].

Part B: LABOR COST OF RESPONDENT BURDEN

According to the U.S. Bureau of Labor Statistics (BLS), Employer Costs for Employee Compensation, the total compensation cost per hour worked for private industry workers in goods-producing industries was \$47.00 (March 2025, Table 4, https://www.bls.gov/news.release/archives/ecec_06132025.pdf). Based on this analysis, CPSC staff estimates that the labor cost of respondent burden is approximately \$1 million, annually [(2,122 hours + 20,103 hours) × \$47.00 per hour = \$1,044,575].

13. Respondent Costs Other Than Burden Hour Costs

In addition to the labor burden costs addressed above, the labeling requirement imposes additional annualized costs. These costs include capital costs for adhesive paper used for each label to be displayed on the CSU. CPSC estimates the cost of the printed label will be about \$0.01. Therefore, the total cost of materials to industry would be about \$200,000 per year (\$0.01 × 20,103,360 units = \$201,033.60).

² According to 2023 County Business Patterns data published by the U.S. Census Bureau there were between 2,075 and 3,955 establishments manufacturing household furniture: [Table CB2300CBP](#); Upper bound NAICS 33712 (Household and institutional furniture manufacturing), lower bound NAICS 337122 (Nonupholstered wood household furniture manufacturing).

14. Cost to the Federal Government

The estimated annual cost of the information collection requirements to the Federal Government is approximately \$4,888, which includes 60 staff hours to examine and evaluate the information as needed for Compliance activities. This is based on a GS-12, step 5 level salaried employee. The average hourly wage rate for a mid-level salaried GS-12 employee in the Washington, DC metropolitan area (effective as of January 2025) is \$55.07 (GS-12, step 5). This represents 67.6 percent of total compensation (U.S. Bureau of Labor Statistics, "Employer Costs for Employee Compensation," March 2025, Table 2, percentage of wages and salaries for all civilian management, professional, and related employees: https://www.bls.gov/news.release/archives/ecec_06132025.pdf). Adding an additional 32.4 percent for benefits brings average annual compensation for a mid-level salaried GS-12 employee to \$81.46 per hour. Assuming that approximately 60 hours will be required annually, this results in an annual cost of \$4,888 ($\$81.46 \text{ per hour} \times 60 \text{ hours} = \$4,887.60$).

15. Reasons for Change in Burden

Burden estimates are revised downward. Sales of bedroom furniture have declined, driven by a sluggish housing market. Sales of CSUs declined roughly 2.6 percent from 2021.

Burden estimates for general certificates of conformity (GCCs) and children's product certificates (CPCs) for CSUs are no longer accounted for within this collection of information. Burden estimates for CSU GCCs are incorporated into OMB Control Number 3041-0203 (eFile). Burden estimates for CSU CPCs are incorporated into OMB Control Number 3041-0159 (Third Party Testing of Children's Products).

Finally, hangtags are no longer required and the associated burden is removed from the collection.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.