#17

Life - Have Fun With It

June 24, 1997

Mr. John D. Preston, P.E.
Directorate for Engineering Sciences
US Consumer Product Safety Commission
4330 East West Highway, Suite 611
Bethesda, MD 20314-4408

Dear Mr. Preston:

This letter will serve as our opposing comments on the proposed changes to the Handbook for Public Playground Safety.

In reference to Horizontal Ladders if they are to be lowered from 34" to 73", they will be too low to be used by 4-6th grades. The children will be actually dragging their feet at this height. The without the use of rungs for take - off and landing on horizontal ladders and overhead rings at least at one end of the equipment will be virtually impossible for the child to use the equipment.

In the section that states that footings may be required to be inspected by a building code official, most localities do not currently have this requirement and those that do not typically have inspectors qualified to perform the inspections. We feel this statement should be removed so that we do not encourage more locales to adopt a policy of this type.

The CPSC draft is eliminating the use of climbing ropes because of the potential for strangulation. The ASTM currently requires that climbing ropes be securely anchored on both ends. There is a revision to the ASTM standard to process that would require that no loop could be formed which would be large enough to allow it to be rapped around a child's neck. I recommend that CPSC adopt the current and proposed procedure by ASTM provisions on climbing ropes.

Because there is protective surfacing material available for heights in excess of 12 feet that meet the CPSC's own cushioning requirements, it is not necessary to arbitrarily limit heights. Neither of the ASTM's standards limit heights of play equipment. CPSC should accept the work of these groups and harmonize its Handbook's contents with ASTM.

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Representing Miracle Recreation Equipment Company

#17

Mr. John D Preston, PE
Directorate for Engineering Sciences
US Consumer Product Safety Commission
June 26, 1997
Page Two

There are thousands of items, such as slides, that are much taller then the draft recommendations that have been in the field for many years. These items have been used by hundreds of children every day yielding hundreds of millions of opportunities for injuries if there were truly any hazard associated with the playground heights. There is no injury data to support the CPSC's position. The limiting of height tremendously reduces the play value of the equipment.

Thank you very much for your consideration of our above ideas of opposition to the new revisions to the CPSC Handbook. We appreciate this opportunity to express our opinions.

Best regards,

Robert K. Ahrens
District Manager

RKA/ah

PARK PLACE
RECREATION DESIGNS, INC.
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FACSIMILE

Date: JUNE 26, 199[illegible]

To:	Mr. John D. Preston	From:	[illegible] Fort Alexander
Company:	C.P.S.C.	Company:	Site Concepts
Phone:	(301) [illegible]-0494-1315	Phone:	[illegible] 465-5701
Fax:	(301) [illegible]	Fax:	(757) 465-5739

Pages including this cover page: 2

MESSAGE

[illegible] Preston

[illegible] Recreation Professional for over 20 years in the Commonwealth of Virgin [illegible] commen[illegible] Proposed Revisions for the C.P.S.C. [illegible]

[illegible] 4.3 [illegible] Height Limitation for School Age Children 8' Height Limi[illegible] [illegible] recommended--

-ASTM F [illegible] and ASTM F [illegible] STANDARDS DO NOT [illegible] heights, why should the C.P.S.C. [illegible] limit heig[illegible]

[illegible] Surf[illegible] [illegible] specify cushioning [illegible] for [illegible] 12 feet & a[illegible]

[illegible] NO INJURY [illegible] shows there [illegible] more falls from hig[illegible] [illegible] than there are from low [illegible] heights

-[illegible] eliminate all the challenging a[illegible] [illegible] ground

[illegible] - Horizontal Lad[illegible] and Overhead Rings. DO NOT eliminate [illegible] off r[illegible]s/ladder--

-Give upper & lower parameters as to what age groups can [illegible] upper body activity. 78" height is often too low for upper elements [illegible] children. THEY WILL DRAG THEIR FEET!

-Elimination of take-off rungs/ladders at the end of these components will reduce greatly the use of these activities by younger age groups which need to build upper body strength.

Section 12.1.7- Climbing Ropes

-C.P.S.C. should adopt the current and proposed ASTM ***STANDARDS*** on climbing ropes.

Section 7.1.1 - Stability. Eliminate the requirement that footings be inspected by a [illegible] inspector--

-Inspection by a Government Building Inspector will tremendously slow installation.

-Eliminate weekend and holiday installs which regularly occur and add unnecessary additional cost to installation process.

#19

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June 27, 1997

Mr. John D. Preston, P.E.
Directorate for Engineering Sciences
U. S. Consumer Product Safety Commission
4330 East West Highway, Suite 611
Bethesda, MD 20814-4408

RE: Proposed Changes to CPSC Guidelines

Dear Mr. Preston:

Virtually all of my working career (30 Years) has been spent in the construction and sale of recreational facilities in the State of Florida. As you can see from my letterhead, I am a State of Florida Certified Building Contractor; this is a very difficult license to obtain; and I hold it proudly. In addition, I have recently taken the National Parks & Recreation's Playground Safety Institute course and expect to hear favorably soon the results of the examination I took to become a certified playground inspector.

Based on my experiences and observations, I offer the following comments about one of the proposed changes to the CPSC's *"Handbook for Public Playground Safety"* - Section 7.1.1: Stability. As I understand this proposed revision, the footings for playground equipment would have to be inspected and approved by an official from the local building department.

1. Most small to medium-sized building departments will only need to inspect new playgrounds once every few years. With this infrequent need, will they spend the time and money required to make sure their inspectors are fully trained and familiar with the complexities of this very specialized type of construction? Playground equipment is totally different than buildings, roadways, electrical, plumbing, etc. Limited or faulty information on the officials' part will cause more, not fewer accidents.

2. Simply waiting a day or so for the building official to schedule a footing inspection means that there is greater risk of injury during the installation process. No matter how much we fence or rope off a new play area, invariably the public tries to use the equipment long before it is complete. Even one more day "under construction" is an added risk factor.

Mr. John D. Preston, P.E.
Directorate for Engineering Sciences
U. S. Consumer Product Safety Commission
June 27, 1997

3. Requiring the building departments to inspect playgrounds raises several new questions:

   -- Will permits be required? Who issues and approves them?
   -- What code governs the size of footings and the strength of concrete used?
   -- Who sets up the inspection schedule?
   -- What is the liability of the building department if improper installation does occur?

Having had many, many conversations with recreation and building department officials over the years, I am still amazed by some of their statements. For instance, just recently I had one tell me that 3" or 4" of sand was more than enough for a safety surface; I was just trying to increase my profits by selling the city more. And another could not bring himself to remove flying animal swings which have been prohibited for years; he told me, "the kids just love them so".

My heartfelt recommendation would be to concentrate on eliminating the proven dangers in playgrounds, not to place decision-making authority in the hands of individuals who are probably already overworked and will have minimal, if any, training in a very specialized field.

Very truly yours,

Joe W. Teel

JWT:jbt

H 20

June 26, 1997

Mr. John D. Preston, P.E.
Directorate for Engineering Sciences
U.S. Consumer Product Safety Commission
4330 East West Highway, Suite 611
Bethesda, MD 20814-4408

Dear Mr. Preston,

In response to the draft of proposed Handbook for Public Playground Safety revisions, I would like for you to consider my perspectives.

Section 4.3.1: Height Limitations

Over the past 18 months I have repeatedly heard how boring many playground have become. Restricting the height of playground equipment also restricts the age appeal and fosters misuse and leaves it to the older children to "create" their own .There are thousands of components that are taller than the draft recommendations that have been in the field for many years. To my knowledge , there is no documentation that correlates safety and height. Before you act on an issue of this significance, you should demand that this correlation exists. Furthermore, there is protective surfacing material available for heights in excess of 12 feet that meet the CPSC's own cushioning requirements, it is not necessary to arbitrarily limit heights. Neither the ASTM F1487 nor the ASTM F1292 place such limits on heights, the CPSC should accept the work of these groups and harmonize its Handbook's contents with ASTM.

Section 12.1.5, Horizontal Ladders and Overhead Rings.

If horizontal ladders are lowered from 84" to 78", they'll be to low for 4th, 5th, and 6th grade users, who will drag their feet. Additionally, this section contains a change that eliminates the use of rungs for take-off and landing on horizontal ladders and overhead rings. Without the use of rungs at least on one end of freestanding equipment of this type, it will be virtually impossible for anyone but the largest of users to use the equipment. If we do not provide children appropriate challenges, they will create their own -- lowering the height will simply encourage more climbing on the top of overhead climbers.

Section 12.1.7, Climbing Ropes.

The CPSC draft proposes eliminating the use of climbing ropes because of the potential for strangulation. ASTM F1487 currently requires that climbing ropes be securely anchored on both ends, and a revision in progress requiring that no loop formed would be large enough to allow it to be wrapped around a child's neck. The CPSC should adopt the current and proposed ASTM provisions for climbing ropes.

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Section 7.1.1. Stability.

This section states that footings may be required to be inspected by a building code official. Most localities do not currently have this requirement and those that do typically don't have inspectors qualified to preform the inspections. This statement should be removed. To confirm the impact of this type of requirement, you should contact the Illinois Park Districts that have had to go through the city building department process. This would severely impede park and playground construction.

Sincerely

Mike Schram

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June 27, 1997

Mr. John D. Preston, P.E.
Directorate for Engineering Sciences
U.S. Consumer Product Safety Commission
4330 East West Highway, Suite 611
Bethesda, MD 20814-4408

Phone: 301/504-0494 ext. 1315
Fax: 301/504-0533

Dear Mr. Preston:

As an interested party I would like to voice my opinion concerning the proposed changes to CPSC's Handbook for Public Playground Safety. I am a father of two and have spent many hours on playgrounds with my children. While watching them play, I have observed that their goal always seems to be finding the most challenging equipment and giving it a try. Let me also say that I have never made a trip to the emergency room because of any playground injuries. The changes being proposed to CPSC's guidelines would only diminish the challenges and fun offered to children on their playgrounds.

The first proposed change deals with height limitations for school age children. My children are both of this age category and would be gravely disappointed if they could not go to the local playground and find a slide over 8 feet tall. I have found the risk to be minimal with the taller slides if they are properly constructed and maintained including the protective surfacing surrounding the slide.

The second proposed change dealing with overhead ladders and rings is also a concern for me. When a child of age 9 or 10 (or older) wants to use these "monkey bar" types of equipment they are looking for the challenge of being able to support their body weight with their upper body strength. My daughter has always been tall for her age but even the average child of that age would be too tall to use this equipment at a level lower than 84" without dragging their feet. At the same time, removing the ladders at the ends of these pieces of equipment would prevent the younger or smaller children from being able to use it at all. Without the use of the ladder, the younger children would not be able to reach the rungs thereby excluding them from the fun and challenges offered by such equipment.

The next proposed change concerns climbing ropes. I have never seen a child trapped or injured by the climbing ropes on playground equipment. My children have certainly never experienced any danger from these ropes. Any of these types of ropes that I have seen are anchored at both ends thereby eliminating the risk of strangulation. As long as no loops can be formed I do not see any problem with this type of equipment.

The last proposed change is related to the footings for the play systems. I believe the suggested requirement of inspection by a building code official is far beyond any needed. I would hope the cities, schools, and other consumers of playground equipment would be responsible enough to purchase their equipment from a reputable manufacturer who would also provide the installation of the equipment or detailed instructions for its installation. If that is the case the footings would be done according to guidelines and no inspection should be required. I would think that most local building code officials could **NOT** be considered an "expert" in this area. The suggestion of this requirement would only encourage local municipalities to adopt such a policy which would entail an extra amount of paperwork, time, and frustration with little or no benefit seen.

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In closing I would like to say that I just do not see any benefits in the proposed changes. I believe children need the challenges provided by taller, more exciting equipment. That is the way children are encouraged to participate in active recreation in the place of hours in front of the television. I thank you for the opportunity to voice my opinion and look forward to the news that these proposed changes are not accepted.

Sincerely,

Richard Tudor
2509 Brookwater Circle
Vestavia Hills, AL 35243

#22

Mr. John Preston, P.E.
Directorate for Engineering Science
U.S. Consumer Product Safety Commission
4330 East West Highway, Suite 611
Bethesda, MD 20814-4408
Fax 301-504-0533

Sir,

In reviewing the CPSC 1997 Draft Revisions - I have the following objection/suggestions.

1) Section 4.3.1 - Height Limitations for School Age Children

Limiting the height to 8 feet is a major impact on the trill value of the equipment. This Trill provides enjoyment as well personal growth and a sense of accomplishment in our children. ASTM (F1487 and F1292) don't Limit Play equipment Height. Why should CPSC? Maybe we should spend less time regulating/limiting our children's growth process and centralize on coaching/encouraging development.

2) Section 12.1.5 - Horizontal ladders and Overhead Rings

Again, limiting the height of horizontal ladders from 84" to 78" limits the trill as well as limiting the taller children from wanting to play on the equipment.

3) Section 12.1.7 - Climbing Ropes

Eliminating the use of climbing ropes because of the potential for strangulation is a tremendous over reaction. Why not adopt ASTM's proposed provisions of anchoring the rope at both ends and require that no loop could be formed large enough to allow it to be wrapped around a child's neck.

Safety concerns should be at the top of everyone's list. However, the answer is to correct/fool proof the situation, not eliminate or regulate out the value or attraction of the toy or item.

This is REAL ENGINEERING!

A Concerned Citizen,

Wade Rhodes

Wade Rhodes, BSME
822 Grant Street
Cape Girardeau, MO 63701

#23

Gazaway & Associates

JERRY GAZAWAY
1703 SOUTH 6TH ST.
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June 26, 1997

Mr. John D. Preston, P. E.
Directorate for Engineering Sciences
U. S. Consumer Product Safety Commission
4330 East West Highway, Suite 611
Bethesda, MD 20814-4408

Dear Mr. Preston:

This letter is being sent in response to the proposals for revisions of the CPSC Handbook for Public Playground Safety.

I have sold playground equipment to schools and cities for Miracle Recreation Equipment Company in the state of Iowa for the past 23 years. In those years I have received many calls in regard to falls from equipment (Miracle's equipment or other equipment). Of all those calls, I have **NEVER** been called about any incident involving an injury on a slide above 8' high. I have received many calls involving injuries from **slides below 6'** in height. This makes a point that my customers reiterate over and over - "that the kids misplay on the lower slides because they are boring and unexciting. We do not want any of those slides."

CPSC has implemented some excellent recommendations that have provided great safety improvements. However, there needs to be a balance for play value and challenge. An arbitrary height restriction does not serve this end for children. CPSC has recommended safety surfacing, and this has been a tremendous safety addition. CPSC has recommended slide platform dimensions, bedway depths, etc. that make slides safer. This is the best way to approach the safety of equipment without taking away from play value and challenge for the youngsters.

Thank you for taking the time to read this letter. I would be happy to visit with you at any time should you wish to contact me.

Sincerely,

Jerry Gazaway

Jerry Gazaway

JG/bjg

24

INDIANA RECREATION Equipment & Design, Inc.
7 S. Main St. · P.O. Box 510 · Monticello, IN 47960
(800) 583-6483 · (219) 583-6483 · Fax (218) 583-6793

June 26, 1997

Mr. John D. Preston, P.E.
Directorate for Engineering Sciences
U.S. Consumer Product Safety Commission
4330 East West Highway, Suite 611
Bethesda, MD 20814-4408

Dear Mr. Preston:

It has recently been brought to my attention that several revisions are currently under consideration with regard to the *C.P.S.C. Handbook for Public Playground Safety*.

I come to you with over thirteen years of design and sales experience in the commercial playground industry. I am proud to say that during the past thirteen years, I have had the honor of representing three very reputable manufacturers of commercial playground equipment: Columbia Cascade-Timber Form, Iron Mountain Forge-Little Tykes Commercial Play Systems Inc. and Miracle Recreation Equipment Company, respectively. My sales and design experience for the above manufacturers have been throughout the states of Michigan and Indiana. I hold a current certification with the National Playground Safety Institute and most importantly of all, I am the proud father of four wonderfully active boys.

It is with concern to a few of the proposed C.P.S.C. revisions that I am writing to you. I hope that you can carefully and objectively consider the consequences of the proposed revisions. My concerns are as follows:

1.) *Section 4.3.1 Height Limitations:*
Understanding that 70% of playground accidents are due to falls to an inadequate surface; I encourage C.P.S.C writers to make every attempt to continue their efforts towards a stronger emphasis on surfacing types and depths versus placing the emphasis on equipment heights.

As long as successfully proven surfacing materials are available for heights in excess of twelve feet, we should not limit play value or play experience opportunities through an across the board height limitation.

This proposed height limitation will generate a false sense of security by psychologically removing the emphasis on surfacing and thereby transferring the emphasis over to equipment height. We will indeed have people in a decision making capacity focusing on height limitation requirements rather than focusing on the real critical issue that should be adequate surfacing.

2.) *Section 12.1.5 Horizontal Ladders and Overhead Rings:*
These overhead events are critical to the physical development of children in the upper elementary age group. It is a known fact that obesity and lack of physical development are a national concern for the children in the preadolescent age group. This is the primary target group that can still be challenged by incorporating horizontal ladders and overhead rings into a playsystem.

Through incorporation of these play events into a given playsystem, we have the opportunity to draw the attention of the ten year old to twelve year old user to utilize the play area. The upper body events will not be utilized by this group if lower height restrictions are imposed. For many children their feet would be at ground level. If they were not able to use these events, more than likely, they would avoid using the play area completely.

Climbing rungs should be allowed at the ends of horizontal ladders and overhead rings in order to allow for access to the events by children of various heights.

3.) *7.1.1 Stability*
The reference to required footing inspections by a building code official should be removed without question. Playgrounds cross too many political boundaries to suggest that this could be realistically initiated, i.e., schools, municipalities, housing authorities, resorts, etc. The question over jurisdiction would be a monumental and unresolved issue. This is without consideration of the impact of cost due to permit fees and construction delays.

This statement fails to consider the practical aspect of playground construction. Unlike building construction, for the most part, footings are poured "prior" to construction thereby facilitating an inspection. The majority of play structures have footings drilled and poured in sequence with the over-all construction process. Required footing inspections could indeed require a full time inspector on site during the duration of an installation project to inspect footings throughout the sequence of the project.

As I mentioned earlier, I am the father of four very active boys. My boys have grown throughout my career in the playground industry. It's pretty exciting for a child to have their father selling playground equipment.

As our children start to reach the sixth, seventh and eighth grade levels, their attention may be easily drawn away from traditional playground type activities. Many attention grabbers are nonphysical activities such as television, video rentals, computers and let us not forget-video games.

Recently the so called "X" games or "extreme games" were nationally televised. Children in this age group are captivated by BMX bikes, skateboards and roller blade's hurdling over ramps, half pipes and quarter pipes. Participants are somersaulting fifteen to twenty feet in the air only to come crashing down, with their bodies smashing onto unforgiving asphalt or concrete. Is this to be the next generation of children's play?

If we remove the excitement from our playgrounds, the kids will find excitement and challenge in other ways.

Please work towards encouraging the C.P.S.C. policy makers to strongly reconsider the suggested height and overhead ladder recommendations. We must work towards keeping excitement and challenge in our playgrounds-especially for the children that are at the preadolescent age level. Working together, we can get these kids off the streets and back on the playgrounds.

Thank you for your attention and consideration.

Sincerely,

Daniel J. Downey

Daniel J. Downey
President

DJD/bg

#25

INDIANA RECREATION Equipment & Design, Inc.
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June 27, 1997

Mr. John D. Preston, P.E.
Directorate for Engineering Sciences
U.S. Consumer Product Safety Commission
4330 East West Highway, Suite 611
Bethesda, MD 20814-4408

Dear Mr Preston:

This letter is in response to the proposed revisions to the Handbook for Public Playground Safety. I am the mother of a 2 year old little boy who loves our city park. Currently he enjoys the "Tot Lot" but also enjoys, with my and his father's supervision, the new larger play system that was just installed at our city park. I also am an employee of *Indiana Recreation Equipment and Design* that sells *MIRACLE* play equipment I have chosen to give my response to you as a Mother, not as an employee of Indiana Recreation.

Height Limitations for School Age Children

There are many excellent safety surfacing materials available now for heights in excess of 12 feet. The safety precautions taken to reduce fall risk are tremendous on new equipment which is that tall. There are narrow bars at the top, canopy's to force the children to sit down and deep slide bedways to prevent them from tumbling over the sides.

The play value will be drastically reduced if you recommend an 8' height limit. This would leave the older children bored and with limited physical challenges.

Horizontal Ladders and Overhead Rings

If you recommend that horizontal ladders are lowered 6" from 84" to 78", they will be too low to be used by children in grades 4, 5 & 6. They will not be able to build upper body strength because their feet will be dragging the surface.

By eliminating the use of rungs for take-off and landing on the horizontal ladders and overhead rings, it will be almost impossible for anyone but the largest children to use these.

Stability

I feel that you should remove the statement requiring a building code official to inspect the footings. Most localities do not have this requirement and those that do usually do not have qualified inspectors for this. This would only cost more for the taxpayer and delay the installation of equipment. All installers carry very expensive insurance and do not want to be sued. Therefore, this should be enough to insure that the footings are placed correctly and are very safe.

Sincerely,

Elizabeth A. Budreau

Elizabeth A. Budreau

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INDIANA RECREATION Equipment & Design, Inc.
7 S. Main St. · P.O. Box 510 · Monticello, IN 47960
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MEMO

TO: MR. JOHN D. PRESTON P.E.

FROM: BARBARA GARETTO, OFFICE MANAGER

DATE: JUNE 27, 1997

REFERENCE: REVISIONS ON SECTION 4.3.1 HEIGHT LIMITATIONS, SECTION 12.1.5 HORIZONTAL LADDERS, SECTION 12.1.7 CLIMBING ROPES AND SECTION 7.1.1 STABILITY AS PROPOSED TO THE CPSC HANDBOOK

I have worked in the playground industry for over seven years. I strongly disagree with all of the revisions listed above. I have several reasons for not supporting the changes. I have listed the most important ones below.

4.3.1 HEIGHT LIMITATIONS: I believe we should not limit the height of equipment due to the tremendous reduction in play value. We need to require adequate depths of surfacing based upon equipment height. Reducing equipment height to 8' would adversely affect the upper elementary school age children who are so vulnerable to look to other sources of entertainment; such as violence, drugs, theft, etc. I would rather see them on the playground. Taller slides and activities offer them challenges and will keep them coming back to have "fun".

12.1.5 HORIZONTAL LADDERS AND OVERHEAD RINGS: Once again, I think the change would affect upper elementary age children. We need them out on the playground working on upper body physical challenges. Reducing the height will undoubtedly make some children look for other ways to have fun because their feet will touch or be too close to the ground. We also need to keep the rungs at access points to accommodate a broad age range of users. Eliminating the rungs will virtually make them impossible to use except one size range of children.

12.1.7 CLIMBING ROPES: I recommend that you adopt the current ASTM provision which is that ropes must be securely anchored on both ends. As a child, this was one of my favorite activities in physical education class. It offered a wonder challenge!

7.1.1 STABILITY: At a point in history when a balanced budget seems to be the most important thing, how can we even consider more government regulation? We have not had inspectors in Indiana that I am aware of and to date have never heard of a problem in this respect to playgrounds. Let's leave the building code officials to their current aspects of construction, after all no one is going to live in the playground.

Please send me any pertinent information to the issues listed above in respect to your decisions. Thank you!

#27

Miracle Playground Sales
PLAYGROUND EQUIPMENT • PARK SERVICE EQUIPMENT • WATER SLIDES • BLEACHERS • ATHLETIC EQUIPMENT • POLIGON SHELTERS, GAZEBOS

June 27, 1997

Mr. John D. Preston, P.E.
Directorate for Engineering Sciences
U.S. Consumer Product Safety Commission
4330 East West Highway, Suite 611
Bethesda, MD 20814-4408

Mr. Preston,

It has come to my attention that CPSC has proposed changes to the existing Handbook for Public Playground Safety which concern me greatly. I am a distributor for a Miracle Recreation and, as such dedicate considerable time and expense educating our customers on the required and recommended safety issues regarding playground equipment. We have used the CPSC publication in conjunction with the ASTM F1487 and F1292 for many presentations and educational sessions, and have heard in response many opinions on the changes in equipment over the last several years. Generally, response has been positive and people in the industry recognize the need to address the safety issues. However, the major concern among those to whom I have spoken is that playgrounds are becoming "boring" and no longer challenge children. Understanding that most of these people come from a generation when playground equipment was as high and as exciting as possible, I can empathize with those feelings. I feel we have reached an acceptable level of safety while still offering challenging activities for all age groups.

A constant stumbling block is the continued obstacle of conflicting or "gray" areas within CPSC and ASTM. I strongly feel that CPSC and ASTM publications should try to work together to agree on all issues so that people do not have the feeling that "they'll just change it next year anyway".

The following sections in the proposed revision are of greatest concern to me:

Section 4.3.1 Height Limitations for School Age Children

As a designer, I confer with risk managers, facilities personnel, teachers, and children regarding what is acceptable for both safety and excitement. CPSC's proposed limit on height is unnecessary due to the availability of protective surfacing. Working with all regulatory agencies, manufacturers have spent considerable R & D assets developing safety surfaces, yet their effective incorporation into play systems appears to be ignored in the proposed CPSC

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change. ASTM does not limit the height of playground equipment, and to my knowledge, there is no data to support the notion that height equals hazard.

Section 12.1.5 Horizontal Ladder & Overhead Rings

Restricting the height of overhead climbers really limits their use to younger, shorter children. Older children would have their feet dragging on the ground at 78". The proposed change to eliminate end ladders or rungs is preposterous. How will all but the largest child reach an overhead component? I have 2 children ages 5 and 10 and they both need to use the rungs to access the climber.

Section 12.1.7 Climbing Ropes

The proposed change to eliminate climbing ropes seems an overreaction. If CPSC were to concur with ASTM and it's current requirements that both ends be securely anchored and the revision of ASTM in progress requiring that no loop be formed large enough to go around a child's neck, it would be sufficient.

Section 7.1.1 Stability

Having footings inspected by a building code inspector is opening a can of worms. Not only are the majority of the inspectors not qualified to inspect playground footings, but the time delay and additional moneys required to employ an inspector would greatly handicap the private parties, municipalities and/or school districts purchasing the equipment for the betterment of their communities.

I appreciate your time and consideration on these issues.

Sincerely,

Kelly Spence
Miracle Playground Sales

ANDERSON RECREATIONAL DESIGN, INC.

#28

P.O. BOX 316 • MEDINA, OH 44258-0316
(800) 232-PLAY (7529) • FAX (216) 723-2356

June 27, 1997

FAX: 301-504-0533
Mr. John D. Preston, P.E.
Directorate for Engineering Sciences
U.S. Consumer Product Safety Commission
4330 East West Highway, Suite 611
Bethesda, MD 20814-4408

Dear Mr. Preston:

After reviewing the proposed revisions to the Handbook for Public Playground Safety, I would like to make a few comments.

Section 4.3.1: Height Limitations for School Age Children
I feel there is not a need to impose height limitations. ASTM F1487 and ASTM F1292 does not have a height limit for playground equipment and CPSC should correspond its regulations with those of ASTM. Also, with the proper protective surfacing installed, there should not be a need to limit the heights.

Section 12.1.5: Horizontal Ladders and Overhead Rings
With the proposed lowering of the Horizontal Ladders and eliminating the rungs for take-off and landing on Horizontal Ladders and Overhead Rings, you are actually eliminating this equipment entirely. The lowering will eliminate larger children from using the equipment and the removal of the rungs will only allow the larger children to use the equipment. It won't be much fun for these larger children when their feet will be dragging the ground.

Section 12.1.7: Climbing Ropes
Make the currently advisory provisions to the ASTM standard regarding that no loop could be formed which would be large enough to allow one to be wrapped around a child's neck. They currently require climbing ropes to be securely anchored on both ends. If CPSC follows these provisions, there would not be a need to eliminate the use of climbing ropes.

Section 7.1.1: Stability
Only a small amount of localities require footings to be inspected by a building code inspector. Most inspectors are not qualified to perform these inspections.

The CPSC needs to seriously take another look at the proposed revisions before a definite decision is made so that any revisions are truly beneficial.

Sincerely,

Mark Anderson
President

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June 27, 1997

Mr. John D. Preston, P.E.
Directorate for Engineering Sciences
U.S. Consumer Product Safety Commission
4330 East West Highway, Suite 611
Bethesda, MD 20814-4408
Fax: 301-504-0533

Dear Mr. Preston,

In response to the proposed revisions for the Handbook for Public Safety, the following issues need to be considered:

Section 4.3.1: Height Limitations for School Age Children
It is my belief that CPSC and ASTM should hold the same opinions so as not to confuse people. ASTM F1487 and ASTM F1292 do not limit the height of playground equipment since testing data shows that there are safety surfaces available for heights in excess of 12 feet. There are no tests that show injuries result from the height of equipment. If the height limit is placed at 8 feet this will greatly reduce the play value for the children. And it is the children that we are building playgrounds for, isn't it? My customers WANT higher and more challenging equipment to keep the children involved. They specifically ask for the tall slides, etc. Ultimately this decision should be left up to the customer to make. Tall equipment provides safe and challenging FUN!!! At least if they are on a playground they will have the proper safety surfacing. What if they are climbing a tree and fall?

Section 12.1.5: Horizontal Ladders and Overhead Rings
This proposal is a no win situation for all children. For the younger children if the removal of the rungs for take-off and landings are removed this will greatly affect their ability to use the apparatus. Realistically, they would require an older adult to provide them access to the bars if they cannot reach them. And for the older children the lowering of the ladders would affect them because their feet would be dragging the ground.

Section 12.1.7: Climbing Ropes
Since ASTM standards are currently under revisions concerning this matter (that no loop can be formed which would be large enough to be wrapped around a child's neck), CPSC should follow ASTM to eliminate this potential hazard.

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Section 7.1.1: Stability
Since most localities do not have inspectors qualified to inspect footings this should be considered when making this decision. Most footings are not completed in one day, so several trips would be required by the inspector. This would only result in higher costs and delays for the customers due to the fact that it may take three or four days for the inspector to get to the site.

I believe that we as adults tend to forget that playgrounds are built to entertain children and that if they don't get their stimulation there, they will get it elsewhere. CPSC needs to carefully weigh these proposed revisions and ensure that they are in the best interest of the children.

Best Regards,

Brad Anderson
President

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FACSIMILE

Date: 6/27/97

To:	**John D. Preston P.E.**	**From:**	**Larrie White**
Company:	CPSC	**Company:**	Anderson Recreational Design
Phone:	301-504-0494 Ext. 1315	**Phone:**	800-992-7704
Fax:	301-504-0533	**Fax:**	937-399-8491

Pages including this cover page: 1

COMMENTS:

I have some concerns regarding the revisions that may be made to the Handbook for Public Playground.

Section 4.3.1: Height Limitations for School Age Children - For many years there has been play equipment at the parks and schools that is taller than the proposed height change and I have never seen any data regarding injuries due to the height that would make this revision necessary.

Section 7.1.1: Stability - This should not be an issue until we are sure building code inspectors are qualified to perform inspections on the footings.

Section 12.1.5: Horizontal Ladders and Overhead Rings - Consumers look for playground equipment that will benefit all age children at the same time. The revisions to these items are limiting their use tremendously since their use is being geared to a certain size child.

Section 12.1.7: Climbing Ropes - ASTM requires ropes to be anchored securely at both ends They are also proposing that no loop be able to be formed to a size large enough to wrap around a child's neck. If CPSC follows ASTM requirements and provisions, the climbing ropes would not need to be eliminated.

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Norman L Mailen
Materials Manager
Miracle Recreation Equipment Company
Hwy 60 & Bridle Lane
Monett, Missouri 65708

June 27, 1997

Mr. John Preston, P.E.
Directorate for Engineering Science
U.S. Consumer Product Safety Commission
4330 East West Highway, Suite 611
Bethesda, Md. 20814-4408

Dear Mr. Preston:

I am in the employee of a major manufacturer in the playground industry. I feel compelled to write this letter detailing my objections to proposed changes to the "Handbook for Public Playground Safety".

Section 4.3.1 Recommended Maximum Assemble Height for School Age Children To suggest or recommend a specific height without addressing protective surfacing and/or its cushioning effects abrogates your responsibility. Protective surfacing materials for heights exceeding 12 feet are currently available that meet CPSC's own cushioning requirements. For lesser heights, protective surfacing requirements, if addressed, would preclude the height limitations you are recommending.

Section 12.1.5 Horizontal Ladders and Overhead Rings Again, you are recommending a height reduction without protective surfacing safeguards. Further, you would be denying use of the playground to a significant segment of our youth up to 12 years of age. Data presented by Debbie Tinsworth, a CPSC staff member, established that a 84" maximum height allowed a user (95th percentile, 12 year old) to use the equipment with proper ground clearance for his/her feet. Within this section is recommendation to eliminate the use of rungs for take-off and landings on horizontal ladders and overhead rings. Without the use of rungs at least on one end of freestanding equipment of this type, it will be virtually impossible for anyone but the largest users to use the equipment.

Section 12.1.7 Climbing Ropes ASTM F1487 currently requires that climbing ropes be secured on both ends. A pending revision specifies no loop could be formed which would be large enough to allow it to be wrapped around a child's neck. Why not adopt ASTM's standards rather than total elimination.

Sincerely,

Norman L. Mailen

Norman L Mailen

Material Manager

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June 27, 1997

Mr. John D. Preston, P.E.
Directorate for Engineering Sciences
U. S. Consumer Product Safety Commission
4330 East West Highway, Suite 611
Bethesda, MD 20814-4408

Subject: Revisions to CPSC "Handbook for Public Playground Safety"

Dear Mr. Preston:

As you can see, I am involved in the playground industry representing Miracle Recreation Equipment Company in the Northwest section of Florida. For almost 25 years, I have worked in the recreation field - both in park construction and more recently in playground sales.

I have a differing opinion on some of the proposed changes to CPSC guidelines, and I would appreciate your considering these points:

- Section 4.3.1: *Height Limitations for School Age Children*

  There have been various play components used for years in excess of the proposed height limitation, and there is no documentation showing increased injuries due to this.

  ASTM Standards F1487 and F1292 do not list any height restrictions, and it will only "muddy the waters" if CPSC and ASTM do not agree. These groups should work together since the goal of both is safer playgrounds for our children, not confused consumers.

  I agree that children need to be kept safe while using the taller components, and this can be accomplished with guardrails, enclosures, etc. such as our company provides. This arbitrary height limitation appears to be promoted by competitive manufacturers who either cannot or will not meet the customers' desire for more exciting play events. And I can assure you that my customers in Northwest Florida demand the larger, more dramatic slides - fun is a very important factor!

Mr. John D. Preston, P.E.
Directorate for Engineering Sciences
U. S. Consumer Product Safety Commission
June 27, 1997

- Section 12.1.5: Horizontal Ladders and Overhead Rings

Lowering horizontal and overhead ring ladders to maximum height of 78" means that 4th, 5th, and 6th graders will be effectively blocked from using these components as their feet will drag on the ground. This is just the age when children are best able and most desirous of using play features promoting upper-body development. Why take them away?

Another point about the changes to this Section - I feel that eliminating rungs for take-off and landings on this type equipment will cause more accidents than it will prevent. Smaller children are going to attempt to use this equipment because they see "the big kids" do it - that is just the nature of children. By taking away the rungs, they will not be able to safely access and exit overhead climbers. Many times I have seen older children, or even adults, lift a small child up so they can grasp the overhead ladder. Then, they walk off leaving the child to get down as best they can. With no access rung ladders, their only choice is to drop to the ground and pray they don't break something.

Thank you for your listening to my views. I respect that your intention is to make our playgrounds as safe as humanly possible, and I agree. But we have to remember that the only 100% safe playground is no playground at all! Will future children be denied this valuable psychological and physical development environment - as well as a place to have just plain, good old-fashioned ***FUN***?

Yours truly,

Janet B. Teel

Janet B. Teel

jbt

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To: Mr. John Preston, P.E.
Directorate for Engineering Services
U.S. Consumer Product Safety Commission
4330 East West Highway, Suite 611
Bethesda, MD 20814-4408

RE: Revisions to Handbook for Public Play Ground Safety

After reviewing the CPSC 1997 Draft Revisions:

I do not agree with several points.

Section 4.3.1 Height limitations for school age children. Why limit the heights? There are protective surfacing materials available for heights in excess of 12 feet that already meet CPSC's own requirements. There are millions of pieces of equipment in the field that are taller than the draft recommendations. This equipment is used every day by millions of children. I have never heard of multiple injuries incurred using this equipment. **LET THE CHILDREN PLAY!**

Section 12.1.5: HORIZONTAL LADDERS AND OVERHEAD RINGS
These rings are not much fun if your feet are dragging the ground. Without rungs for take off and landing on horizontal ladders and overhead rings at least on one end of freestanding equipment only the largest kids will be able to use it.

Section 12.1.7 CLIMBING ROPES
Secure the ropes on both ends as ASTMF1487 now requires.

Section 7.1.7 STABILITY
Most small towns don't have building inspectors. Those that do are usually not qualified to perform this type of inspection.

SINCERELY,

Greg Knutson

GREG KNUTSON
P O BOX 261
DEXTER, MO 63841

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Drago comments to playground guidelines

Page 2
Paragraph 1: There is still room for confusion over the age groups. For example, are you over 5 one day after your fifth birthday or when you turn 6? One way to clarify this issue is to offer values in months either in place of or in addition to years: Children from 2 (24 months) up to 5 (60 months); children over 5 (over 60 months) to 12 (72 months). This would also be consistent with for example technical requirements under FHSA.

Page 4
Section 4.1, paragraph 2: G's should be Gs. (Same correction to section 4.2, line 5).
Also, last sentence might be more accurate as: Head impact injuries are ~~not~~ believed to be <u>not</u> life threatening...

Page 5
There is some incongruity about referring to a "part" as a "distance". I suggest adding to the first paragraph, "...a Critical Height value <u>equal to at least the distance in feet between the ground and the highest accessible part of the equipment</u>. This gives you a reference point for measuring height and the correct measurement unit.

Then in section 4.3, highest accessible "part" of the equipment would be:
- -for climbers and horiz ladders, the highest part of the structure
- -for platforms, the top of the guardrail, or the platform surface
- -for merry-go-rounds, the highest perimeter
- -for see-saws, any part that reaches a max height
- -for spring rockers, the seat or designated play surface
- -for swings, the pivot point where the swing's suspending elements connect..

Page 6
Section 4.4: Should totally enclosed equipment be exempt?
Section 4.5, paragraph 3: Is *Critical Height* used here to mean shock absorption performance or height, "as used in this guideline"--see section 4.2

Page 8
Last paragraph, last sentence, editorial comment (redundant phrase): For example, ...protruding from the ground. ~~onto which a child may fall~~

Page 9
Section 5.1.1: Question--are play events play surfaces, or is it the type of play anticipated? In the latter case, should the wording then be: anticipated (?intended) play events will occur no more than...?

Section 5.1.3 For parallel wording with the first paragraph, the second should say.....twice the height of the pivot point measured from a point directly beneath the pivot on the supporting structure to the lowest point on the occupant seating surface....

Section 5.1.4: Wrong reference to figure 18.