#49

TABLE I: Round Robin Participants

Participant	Contact	Laboratory Type	ANSI C/ATTACHED
Carlisle Tire & Wheel Co. P. O. Box 99 Factory & C Streets Carlisle, PA 17013	Robert C. Shiffer	Industrial	Monorail
U. S. Testing Company 291 Fairfield Avenue Fairfield, NJ 07004	Frank Savino	Independent	Monorail
Detroit Testing Lab. 7111 Eleven Mile Road Warren, MI 48092	John Diggs	Independent	Guidewire
University of Tennessee Biomechanical Eng. Lab. 153 Alumni Memorial Bldg. Knoxville, TN 37996-1500	Dave Halstead Mel Cook	University	? monorail
Little Tykes 1 Iron Mountain Drive Farmington, MO	Mark Heflin	Industrial	Dual Rail
CSA Laboratory Canada	Henry Tran	Standard Organization	? monorail

F08.63 ROUND ROBIN - 1996-1997

SAMPLE	A	B	C	D	E	F	G	H
SCRIPTION	Green Black Flecked Top Molded Pad 2 1/4"x8"x18"	Dyed Green Molded Pad 1 1/2"x18"x18"	Black Molded Pad 2"x18"18"	Wood Fiber 12"x18"x18"	Chopped Rubber 8"x18"x18"	Black Molded Pad 2"x18"x18"	Grey Molded Mat 2 1/2"x18"x18"	Red Molded Mat 3 3/4"x18"x18"
OP HEIGHT	5'	5'	5'	5'	8'	8'	8'	8'

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#49

2ND **DRAFT**

REPORT TO IPEMA SURFACING CERTIFICATION SUBCOMMITTEE
BY WOOD FIBER TASK FORCE

1. The tests of sieve particle size distribution and F1292 tests were completed and reported to the two manufacturers that participated. We have decided the coded test data will not be distributed at the meeting of the Subcommittee. We have modified sieve requirements as follows:

Sieve Size	Pass Spec by Weight %
3/4"	99 - 100
3/8"	85 - 100
#16	0 - 15

A summary of sieve and F1292 results are attached in table format.

2. For F1292 tests covered in the Procedural Guide
   a) 24" x 24" x 12" made of 3/4" plywood including bottom and located on concrete floor or steel plate.
   b) Compaction - 33% (example: for 12" from 16" material)
3. Sieve Tests
   a) Samples from each supplier to DTL (or from participant/licensee) annually.
   b) See paragraph number one above for sieve specs.
4. Number of Tests per Year
   a) 20% of suppliers per year.
   b) 10% to be lab tested (1 full F1292 at three temperatures and rest at 70°F).
      10% to be field tests. Field sites to be older than three years - temperatures measured ≥ 30°F. Field tests with maintenance faults corrected and reported to supplier and participant.
5. Manufacturer Inspections (Visits)
   a) Once per year; limited to one or two days.
   b) To cover quality-related issues such as :
      1. Quality control measures of suppliers.
      2. Instructions for playground area installation.
      3. Warranties.
      4. Contamination restriction and other product inspection instructions.
      5. Periodic (monthly?) samples from supplier to participant.
      6. Formal agreement (license agreement).
6. Directory
   a) Included in IPEMA web site with Public Playground Equipment Directory; entries and deletions by DTL only.
   b) Suppliers not listed, but supplier list maintained by DTL.
   c) Participant need not list all suppliers.
   d) Directory maintained and updated by DTL only.
7. Challenge procedure - same as for IPEMA Equipment

Prepared by Roger J. Amorosi, Detroit Testing Laboratory, Inc., from meeting with Mssrs. Heath and Illgis on June 18, 1997.

RJA:as

2ND DRAFT

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SIEVE AND F1292 SUMMARY RESULTS

	ASTM F1292			ASTM C136		
SAMPLE NO.	FT.	HIC	G's	SIEVE SIZE	PASSING %	SPEC %
A1	7	845	154	3/4	100	99 - 100
				3/8	96	85 - 100
				#16	10	0 - 15
B1	7	850	153	3/4	100	99 - 100
				3/8	98	85 - 100
				#16	7	0 - 15
C1	7	995	167	3/4	100	99 - 100
				3/8	95	85 - 100
				#16	3	0 - 15
1	8	896	154	3/4	100	99 - 100
				3/8	94	85 - 100
				#16	6	0 - 15
2	8	851	151	3/4	100	99 - 100
				3/8	94	85 - 100
				#16	10	0 - 15
3	8	861	153	3/4	100	99 - 100
				3/8	91	85 - 100
				#16	3	0 - 15
4	8	905	151	3/4	100	99 - 100
				3/8	98	85 - 100
				#16	14	0 - 15
5	8	787	139	3/4	100	99 - 100
				3/8	90	85 - 100
				#16	7	0 - 15

July 1, 1997

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Site Masters, Inc.
5995 Harrison Ave., Cincinnati, Ohio 45248 513-922-1499 • Fax 513-922-9165

June 29, 1997

Mr. John Preston
Consumer Product Safety Commission
Washington, D.C. 20207

Re: Draft of the CPSC Handbook

Dear John:

I know that you and I have discussed the draft at length, however I thought it would be helpful to have the comments on paper.

Definitions:
Tot Swings: I am concerned about the definition including an age of "under four". Many three year olds are too large for the fully enclosed bucket seats. The manufacturers have reduced the leg openings so that there is no head entrapment. Three year olds with chunky thighs are getting their legs caught in the openings. Most three year olds are capable of sitting in a regular swing seat and don't require the fully enclosed seats. This recommendation of age may place a manufacturer in an awkward position, especially if a chunky three year old gets caught in their seat. Certainly the greater hazard is of head entrapment. By placing an age in the definition you are forcing the manufacturers to consider the diameter of the largest three year olds thighs with clothing. I may be wrong, but I don't think it is possible to have the perimeter of the opening satisfy both.

4.3.1.Recommended Maximum Accessible Heights:
I am concerned about the recommendation regarding heights for both age groups. I have always felt that the height of equipment should be dictated by the proper use of surfacing material. I feel it is extremely unfair to penalize those agencies who install the proper surfacing material and who maintain those surfaces simply because some agencies do not take care of their facilities. Our playgrounds are becoming more sterile every day with less movement and less challenge. If we do not provide challenge for the children they will create their own. Any one who has ever observed children at play can tell you that when a child becomes bored with an activity that they will then attempt to create challenge for themselves. This is evidenced by the number of children that run up slides, that climb on the top of tube slides and that even though roof tops are not a designated play surface, the children still climb on top of them. It has always been

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my contention that if a climber does not present a challenge, the children will abuse it by creating their own challenge such as standing on top of it or jumping from it.

Limiting the height of pre-school equipment to four feet will force platforms with guardrails to be no higher than 19 inches. At 19 inches a platform does not even need a guardrail. We might as well eliminate guardrails and say that all platforms for pre-school age should have protective barriers. But I am unclear from the way the guideline is written if the top of the protective barrier is not included in the four feet and we measure from the platform? Also what about climbers that attach to platforms. If the critical height of the apparatus is the tool that we use to determine the four feet, then we can't have climbers. Many of the small spiral slides that the pre-school age group love dearly must come off of a 60 inch high platform in order to maintain the appropriate clearances. These slides have proven to be very safe for this age group. Why must they be eliminated.

If your recommendations for height are based on the New Zealand Study I believe that they are flawed. My recollection of that study was that it did not do a very good job of assessing the surfaces that the children fell on. Protected surface could have been 1 inch of pea stone or 12 inches of mulch.

Should the Commission decide to keep a height limitation I would be more comfortable with 60 inches for platforms for the preschool age group and some clarification regarding how climbers that attach to platforms would be measured. Even a free standing climber that is only four feet high would offer very little challenge to a three or four year old. I would not have a problem with limiting the platform height for the school age group to eight feet if the proper clarification's regarding climber attachment were added and if roofs were excluded.

4.4 Excluded ground level equipment:
Would you consider adding play houses to the exemption if there were no elevated designated play surface?

8.1 Paints and Finishes:
I find the addition of the statement "should not decrease the slip resistance" to be something that is very difficult to measure especially since there is no performance standard for playground equipment that would offer guidance relating to slip resistance. It continues to be difficult to describe "slip resistance" in relation to the 81 handbook. It was an improvement in the guidelines in 91 when the statement was taken out. Now I feel that in a round about way the Commission is requiring slip resistance. I have no problem with adding recommendations for slip resistance if it can be defined and tested. Imagine 4000 Certified Playground Safety Inspectors trying to determine if the addition of plastisol coatings made the expanded steel platform slippery!

12.1.5 Maximum height for upper body equipment
I feel that lowering the maximum height to 78 inches creates a hazard for the older user. At 84 inches I see many eleven and twelve year olds struggling to use the

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horizontal ladders because their feet are dragging. I have worked with many physical education departments who I have helped design fitness centers for their athletic programs. When children use a track ride they will curl their bodies or bend their knees. This seems to help them go faster, or at least they just think so because observation shows that the majority tend to do this. Watching children on horizontal ladders, they tend to spread their feet apart and swing side to side. Their knees are not usually bent unless the ladder is too short. I do not feel that reducing the height six inches will make that much of a difference as far as falling is concerned and may make a world of difference in the ability of the apparatus to be used efficiently and easily by the older user.

I am also concerned about the elimination of the use of rungs for the take off and landing area of an upper body device. I have audited and inspected hundreds of playgrounds over the years and have come to the conclusion that it is indeed safer to provide a landing than to not provide one. Years ago several manufacturers created fitness courses for elementary schools. These courses had horizontal ladders that did not have any horizontal rungs that the children could use to stand on to access the ladder rungs. Almost without exception kids would find upside down trash cans, boulders, tree branches and what ever else was loose and available that the kids could haul in and place under the ladder so that they could access it. Kids need a way to reach the ladder. I don't believe that excluding the use of rungs as a means of access will make the apparatus any safer.

12.1.7. Climbing ropes.
While I understand the hazards associated with ropes on playgrounds I do not think that ropes that are securely anchored at both ends that would comply with the ASTM standard have ever been associated with a strangulation injury. I agree with not allowing free swinging ropes. But I do not agree with the recommendation to ban all ropes. Developmentally children use a completely different muscle group when scaling these ropes, plus there is the added excitement associated with the flexibility of the rope. Consider keeping your recommendation consistent with the ASTM.

Thanks for your time and consideration of my comments. I don't envy the task that you have before you.

Sincerely,

Teri Hendy

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H M S

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July 7, 1997

Mr. John Preston
U.S. C.P.S.C.
4330 East West Highway
Bethesda, MI. 20814-4408

Dear John,

I have reviewed the proposed draft of the revised Handbook for Public Playground Safety, and would like to offer the following comments:

1) Introduction - The last statement in Paragraph 2 should be expanded to read:

"It contains more technical requirements than this handbook and is primarily intended as a guide for use by equipment manufacturers, architects, designers, planners, landscape architects and all those requiring more technical information."

Rationale: The ASTM Standard 1487 is regularly used by all of the above professions in their approach to playground developments.

2) Definition - I strongly urge CPSC to change the designation of Fall Zone to Use Zone.

Rationale: The Handbook is the only publication to use "Fall Zone" and this causes great confusion to those concerned with the Zones. ASTM F1487, the Canadian Standard and the upcoming Access Board ADA Compliance Regulations all use the "Use Zone" designation. This would be a simple move toward harmonization.

3) Determining Shock Absorbency of a Surfacing Material. Paragraph #3 - The first sentence should read:

"The most widely used test method for evaluating the shock absorbing properties of a playground surfacing material is to drop an instrumented metal headform or a tri-axial headform onto a sample of this material..."

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Rationale: With the passage of the revision for F1292, using the tri-axial headform, this should be added.

4) 4.2 Critical Height - Add "tri-axial headform", if item 3 (above) is accepted.

5) 4.3 Highest Accessible Part of Equipment.

Climbers and Horizontal Ladders - This is not quite correct in its implications. Horizontal ladders are not intended to be climbed upon. Perhaps you should break this into two parts:

Climbers - For structures that are intended to be climbed upon, the highest accessible part is the maximum height of the structure.

Horizontal Ladders - For structures that are not intended for climbing but can still be easily accessed, the highest accessible part is the maximum height of the structure.

6) 4.3.1 Recommended Maximum Accessible Heights. The height restrictions for both pre-school age children and school-age children should be removed.

Rationale:

a) The 4 ft. height for platforms provides no challenge for 4 year-olds.

b) The recommended height for horizontal ladders (5 ft.), combined with the recommendation not to use rungs for access, means that a 5 ft. overhead ladder can be attached to a 3 or 4 ft. platform, making it simple to step up and walk across the horizontal ladder.

c) The 8 ft. height restriction eliminates 10 ft. swings which have been in use many years.

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d) Does CPSC have any data to support the 4 ft. and 8 ft. height restrictions?

7) Loose-Fill Materials - Your statement should be corrected:

"Loose-fill materials should not be installed over hard surfaces such as asphalt or concrete unless regular inspection can be guaranteed..."

Rationale: The maintenance of any surfacing depends on its use, time of year, etc. The decision on the frequency and constancy of playground surface maintenance should be the responsibility of the owner/operator.

8) The Table 1 should address only compressed depth, eliminating the testing results on uncompressed depths.

Rationale: Uncompressed depths of loose-fill materials become compressed immediately after the first use; therefore the uncompressed depth information is irrelevant. CPSC should advise that loose surfacing materials should be tested at compressed depths only.

9) Table 1 should read, "Engineered Wood Fibers", instead of "Uniform Wood Chips".

Rationale: The wood fibers tested were not wood chips and were not uniform.

10) 4.6 Accessibility to the Disabled - Eliminate statement in first paragraph:

"Specific Federal requirements for accessibility to playgrounds by the disabled are expected to be published in 1998 and may prohibit the use of many loose fill materials."

Rationale: If 1998 data is not met, it will make the Handbook incorrect. Also, the compliance regulations may not prohibit materials; rather, they may call for firm, stable and slip-resistant surfaces, except in the use zone, where the surface will also have to be impact-attenuating.

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11) 5.1.2 Slides - The use zone in front of a slide should extend a maximum of 14 ft.

Rationale: I do not believe there is any information on a child shooting out even 12 ft. From a slide exit, especially as we lower the slides.

12) 6.1 Choosing a Site. The fencing openings for Home Pools are 4 inches apart. Since the vertical guardrail openings for equipment (CPSC and ASTM) call for 3.5 inches, CPSC should add an explanation of why 4 inches is allowed on fencing.

13) 6.3. Age Separation of Equipment

a) Flexible components should be allowed for 2-5 year olds.

Rationale: Depending on the product, these components can be used easily by younger children, as long as there is another form of access or egress.

b) What is a long spiral slide?

c) Statement on signs should be changed:

"Signs posted in the playground area should be used to give some guidance to adults as to the age appropriateness of the equipment".

Rationale: Strengthens the need for signage identifying the ages to use the equipment.

14) Table 2 - Stairways - The slope of a stairway should be allowed at 50 degrees, at least for the 5-12 year old.

Rationale:

a) There is no history that I am aware of caused by stairway slope, while the 50 degree is and has been commonly used in the industry for year.

#51

b) Play is a physical challenge and learning experience. The slope of the stairway provides the greater challenge in children's play.

15) 12.1.5 Horizontal Ladders and Overhead Rungs: Eliminate the statement: "The use of rungs for take-off and landing is not recommended."

Rationale: Rungs are in use for 50 years and have posed no problem. Platforms would have to replace rungs and will certainly substantially increase the cost of the ladders, without any knowledge of whether that is a safer way to go.

16) 12.1.7 Climbing Ropes - Only if unsecured at one end should the rope be banned, or if the rope can be looped back on itself. The statement that climbing ropes are not recommended should be deleted.

Rationale: Climbing ropes are excellent physical fitness equipment, and help to develop upper body strength.

17) 12.1.8 Balance Beams - Balance beams for 5-12 year olds should be allowed at a maximum of 16 inches.

Rationale: Since we do not know of any history of injury at 16 inch heights, as opposed to 12 inches, I would urge that CPSC match the ASTM F1487 Standard.

18) 12.6.2 Swings - General

a) CPSC should identify the size of the opening when a S-Hook is closed.

Rationale: "Closed as tightly possible" is ambiguous and open to interpretation.

b) Cables should be allowed as a method of attaching swings and CPSC should explain the difference between ropes and cables.

19) 12.6.2 Single-Axis Swings - In addition to the recommendation for rubber or plastic swing seats, CPSC should add a statement about only using lightweight swings.

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Rationale: Rubber and even plastic seats can be quite heavy, depending on their construction. Even though the material is correct, impact can cause concussion because of the weight.

20) Appendix C (P. 44) - Installation/Maintenance - Statement "Should not be installed over existing hard surfaces" is incorrect and in conflict with earlier statement that such surfaces can be installed if daily maintenance is guaranteed.

21) Appendix D (P. 48) - "Uniform Wood Chips" should be changed to "Engineered Wood Fibers") [see previous comment, Item 9]

Frankly, I am most concerned that the horizontal ladder can no longer be a single standing component but, in being attached to platforms, will create some serious hazards in inviting children to walk on top of them. I know that F15.29 has voted to stay with the age limits of 2-12 years. However, should that vote not be upheld, we would like the opportunity to discuss this further with you.

All in all, John, you and your staff have done a terrific job on this revision. We may not always agree, but I stand in awe of what you've accomplished.

Sincerely,

Frances Wallach

Frances Wallach, Ed.D.

FW:ec

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July 7, 1997

Mr. John Preston
U.S. C.P.S.C.
Washington, D.C. 20207

Dear John,

As you may know, at the last ASTM meeting of F15.29, the Committee voted, as a group, to appeal to C.P.S.C. to attempt a closer coordination with the ASTM F1487 standard and the proposed North American harmonized draft standard. It was our understanding that C.P.S.C. was strongly in favor of the development of a harmonized standard and the draft we have reviewed does not appear to be headed in that direction.

I am enclosing those comments which were submitted by the F15.29 working groups under their review of the draft. Unfortunately, Jean Schappet was unable to attend our meeting since she had a fairly serious accident and we do not have comments from her group. However, I have reviewed the draft letter and it covers those concerns which we, at F15.29, would have voiced.

Please note the working group comments. I am hoping that before you finalize your decisions we can officially, as F15.29, meet with you and your staff, to discuss the harmonization effort.

I am sending my own comments separately, and look forward to hearing from you.

Sincerely,

Frances Wallach

Frances Wallach, Ed.D.
Chair, ASTM F15.29
Public Use Playground Equipment

FW:ec

#52

Facsimile Cover Sheet

To: Fran Wallach
Company: Total Recreation Management
Phone: 212-321-2546
Fax: 212-912-1345

From: Teri Hendy
Company: Site Masters, Inc.
Phone: 513-922-1499
Fax: 513-922-9165

Date: 7/3/97
Pages including this cover page: 1

Comments: Fran, This is the only comment that our group had that specifically related to the sections of the standard that we had worked on.

CPSC Revision - Entrapment Group Comments.

Section 12.1.7 - Climbing ropes - We encourage CPSC to consider allowing ropes and cables that comply with the revised recommendations of ASTM. Our feeling is that climbing ropes provide good upper body development and enable a child to learn to scale a flexible component. All of the accident data relating to strangulation on both home and public equipment relate to free swinging ropes that were unanchored. Instead of banning them we ask that CPSC consider addressing the hazard associated with ropes and cables. The addition a performance requirements as stated in the revision of the section on ropes adds the requirement that a rope not be able to loop back on itself creating a loop perimeter of greater than 5 inches. When a rope or cable is securely anchored in this manner it is very difficult if not impossible for a child to untwist the rope, separating the strands creating a loop perimeter of 14 inches or greater. If this is a concern for CPSC we suggest adding performance requirements regarding the separation of the strands of the rope, rather than prohibiting their use.

Teri

#52

DRAFT CPSC HANDBOOK REVIEW/RECOMMENDATIONS

ACCESSIBILITY & SWINGS WORKING GROUP

ASTM SUBCOMMITTEE, F15.29
June 18-19, 1997
West Conshohocken, PA

1) Definition for Fall Zone (page 3):

- Recommend that CPSC adopt the ASTM definition for Use Zone and use the terminology throughout their document.

Rationale: The Use Zone, as used and defined in the ASTM Standard, is an area for falling and for circulation. This would also be consistent with the previous CPSC Handbook.

2) CPSC Section 5.1.1 (the new wording):

- Recommend changing "adjacent play events" to "adjacent designated play surfaces" and adding the definition "designated play surface" from the ASTM Standard to their document.

Rationale: Adjacent play events is not defined and is subject to various interpretations (Is a deck an adjacent play event?).

3) CPSC Section 6.1 (second line; new wording):

- The Barrier does not have to surround the playground. No barrier is needed between the playground and open park/play areas but is necessary between the playground and parking lots or streets (known hazards).
- Change the minimum height of barriers from 5' to 4'.
- Eliminate the reference to CPSC Publication No. 362 and add in the wording that it conforms with the various sections dealing with openings in the document (protrusions, entrapment, etc.).

Rationale: The barrier is intended for casual behavior and not to capture children. Changing the minimum height to 4' would comply with current state requirements already in use. Eliminating the reference to CPSC Publication No. 362 allows you to maintain a barrier while allowing for those made out of vegetation and conforming to other sections of the document.

4) CPSC Section 6.3:

- Eliminate "Free Standing Climbing Events with Flexible Components" from the list of playground equipment not recommended for pre-school age children.

Rationale: Equipment can be designed, and is already in use, for this age group that is appropriate. The Working Group agrees that this shouldn't be the sole means of access on a composite structure but that this kind of equipment can be designed age appropriately to be safe and it would provide an experience not found elsewhere.

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5) CPSC Section 6.3:

- How do you define "Long Spiral Slides?"
- Does CPSC really mean "be an area with shrubs or benches for supervisors?"
- The Working Group agrees with having signage for age appropriateness. However, change "can be used to give some guidance" to "are recommended to provide guidance."

Rationale: A stronger statement is needed/warranted.

6) CPSC Section 7.1.1 (new wording):

- Add in the word "playground" prior to the word "equipment" to clarify what type of equipment is being referenced here.
- Eliminate the reference to "building codes" and add a statement to have people check with local city/government bodies for compliance regulations/requirements.

Rationale: Building codes may not be applicable to playground equipment. However, the individual should be encouraged to seek out regulations and requirements applicable to playground equipment installation. In addition, these factors should be considered when choosing the site for the playground (thus, move this section to section 6.1).

7) CPSC Section 12.6.2 (new wording on page 35):

- Change "unoccupied" to "occupied" and use 12" for both pre-school and school-age children.

Rationale: The occupied swing is more uniform when measured this way and testing done for the IPEMA program have indicated minimal variations on the user occupying the seat. In addition, the unoccupied seat will have more variance in terms of the materials used and the natural sag after many uses. Finally, the 12" clearance was based on the expanded chest measurement of the maximum user while lying on the ground.

- Figure 21, add wording under the heading indicating where the dimensions are taken from based on the occupied seat.

Rationale: To make the CPSC document consistent with ASTM and to eliminate a 6-8" variable. We would also like to change the 33" vertical dimension for measuring D1 to 60" from the top of the protective surfacing to be consistent with ASTM and be more user friendly to people in the field.

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8) CPSC Section 12.6.3:

- Change "Full Bucket" to "Fully Enclosed Swing Seat" as used, and defined, in the ASTM Standard.
- Eliminate the recommendation of not including Tot Swings with other swing seats.
- Change the clearance from 24" to 12" and "unoccupied" to "occupied."

Rationale: A Fully Enclosed Swing Seat is defined in the ASTM Standard. The combining of Tot Swings with other swings should be permitted in the same bay as parents with children of various ages want their children to swing together. You also need to consider the potential limitations when accessible swings are used. The Working Group felt that a 12" clearance under the Tot Swing was adequate as it makes it easier for a parent to lift the child into the seat. There is no hazard to making it a minimum of 12" and changing the measurement to when the seat is occupied would be consistent with other sections of the document.

9) CPSC Section 4.3.1:

- Clarify the Section by changing the maximum height "for swing hangers" to the "swing pivot point" for both preschool-age and school-age children.
- The highest accessible part of equipment for school-age children should be 10' for swings and 84" (7') for ladders.

Rationale: The swing pivot point is consistent with ASTM and is easily measured in the field. The 10' height limitation would include many swings currently in the field. Ladders for school-age children should remain at a maximum of 84" (7') to allow a challenge for older users.

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July 14, 1997

Mr. John Preston
U.S. C.P.S.C.
Washington, D.C. 20207

Dear John,

Listed below are the comments on the proposed revision of the Handbook, from Rob Pepper's work group in F15.29:

Section 4.5 - Shredded tires are mentioned, but don't appear in the chart on page 7. Should they?

Section 9.4 and figure 9 - Is the underside of the slide included? What is the underside of the slide? On tube slides, is the outside included?

Section 11.6 - What about the top of a slide, is access to the slide included in the 15" width rule?

Section 12.1.4 - Why are rungs not recommended?

Page 45 - Are shredded tires considered "Inorganic Loose Material"?

On Figure 21 - D3 is greater than 24" for tot swings, see Section 12.6.3. This is not shown in the drawing.

I hope these are not too late to be considered.

Sincerely,

Frances Wallach

Frances Wallach, Ed.D.
Chair, ASTM F15.29
Public Use Playground Equipment

FW:ec

#53

CITY OF

WASHINGTON

MISSOURI

June 30, 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. Presto,

Attached please find a copy of a fax I received on 6-27-97. My concern is that "tested / accredited" standards be used to base guidelines upon. In my opinion, standards should always be questioned, tested then modified, either more or less restructure, prior to guidelines being established. This allows the scientific research necessary to provide adequate and acceptable guidelines.

Thanking you in advance for your thoughtful consideration.

Sincerely,

Jerry D. Jasper, Director
Parks and Recreation Dept.

PARKS AND RECREATION DEPARTMENT
1220 SOUTH LAKESHORE DRIVE
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June 27, 1997

TO: Buyers of Playground Equipment

The playground industry has adopted and most manufacturers have complied with the current playground standards published by the American Society of Testing Materials in 1993 and 1995!

You may or may not be aware, the CPSC has proposed some revisions to the Handbook for Public Playground Safety which could effect future playgrounds. The CPSC is soliciting public comments through June 30, 1997 on proposed changes. It is your best interest to express opinions on these changes!

Section 4.3.1: Height Limitations for School Age Children

They want to limit playground equipment height to 8'.
Neither ASTM F14897 nor ASTM F1292 standards limits heights of play equipment. CPSC should accept the work of these groups and harmonize its Handbook contents with ASTM. "American Society of Testing Materials".

Section 12.1.5: Horizontal Ladders and Overhead Rings

They want to lower height from 84" to 78" and eliminate vertical rungs from at least one end of ladders!
This will encourage crawling on top of ladders and make user go back to beginning or fall back to surface (Only the most fit child will be able to use - those who have physical limitations will be penalized)

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Section 12.1.7: Climbing Ropes

They want to eliminate ropes to prevent possible strangulation.
ASTM F1487 currently requires climbing ropes be secured on both ends which eliminates knots which eliminates possible strangulation!

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. This will create another burden on buyer!

ASTM is a standard and CPSC is a guideline. If you agree with ASTM standards and see no need to modify CPSC guidelines you should notify Mr. Preston with your comments before June 30, 1997!

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If you create future playgrounds without fun, play value and challenge, you will produce play (grounds without kids)!

Thanks,

Roger J Hutchinson

RJH/cpsc