DEPARTMENT OF
PUBLIC HEALTH AND HUMAN SERVICES
COMMUNICABLE DISEASE CONTROL & PREVENTION BUREAU
FOOD & CONSUMER SAFETY SECTION

80

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July 9, 1997

John D. Preston, P.E.
Directorate for Engineering Sciences
U.S. Consumer Product Safety Commission
Washington D.C. 20207

RE: State of Montana/Department of Public Health & Human Services Comments on May 1997 Draft "Handbook for Public Playground Safety"

Dear Mr. Preston:

The following comments were made by Thomas Danenhower, Injury Control Coordinator, Montana Department of Public Health & Human Services.

Page 4, definition for "unitary surfacing material": The definition should include specifications, e.g., 1" thick, rubber material able to prevent injury at 200 G's etc. HIC <1000, proper critical height value.

Page 15, 8.2 Hardware: Add - all belts should be avoided when possible and rivets used. If bolts and screws are used, they need to be of proper length to use a self locking covered nut of the type that is hemispherical, leaving no exposed bolt end. Screws should be avoided unless recessed into the wood.

Page 16, 8.3 Metal Surfaces: Metal surfaces should <u>not</u> be coated with plastic or slides made of plastic. Plastic cracks and peels, leaving dangerous sharp edges. The burn danger from bare metal is minimal compared to a heat/burn buildup from a dark plastic.

Page 17, 9.3 Protrusions. . .: Recommend using rivets rather than bolts.

There should be a section added to the handbook which addresses playground locations and the following topics:

A) Be located in an area where there are readily available police to provide drive by surveillance capability to prevent/deter drug dealing.
B) Be located far enough from roadways or fenced off from roadways to prevent "dart-outs" after balls, etc.
C) When located adjacent to traffic, roads should be posted as maximum speed limit of 25 MPH at all times.
D) Include some "social environmental" suggestions in a section, such as the attached -5 step developmental ideas.

Thank you for the opportunity to comment.

Sincerely,

Mitzi Schwab, M.S., R.S.
Food & Consumer Safety Section
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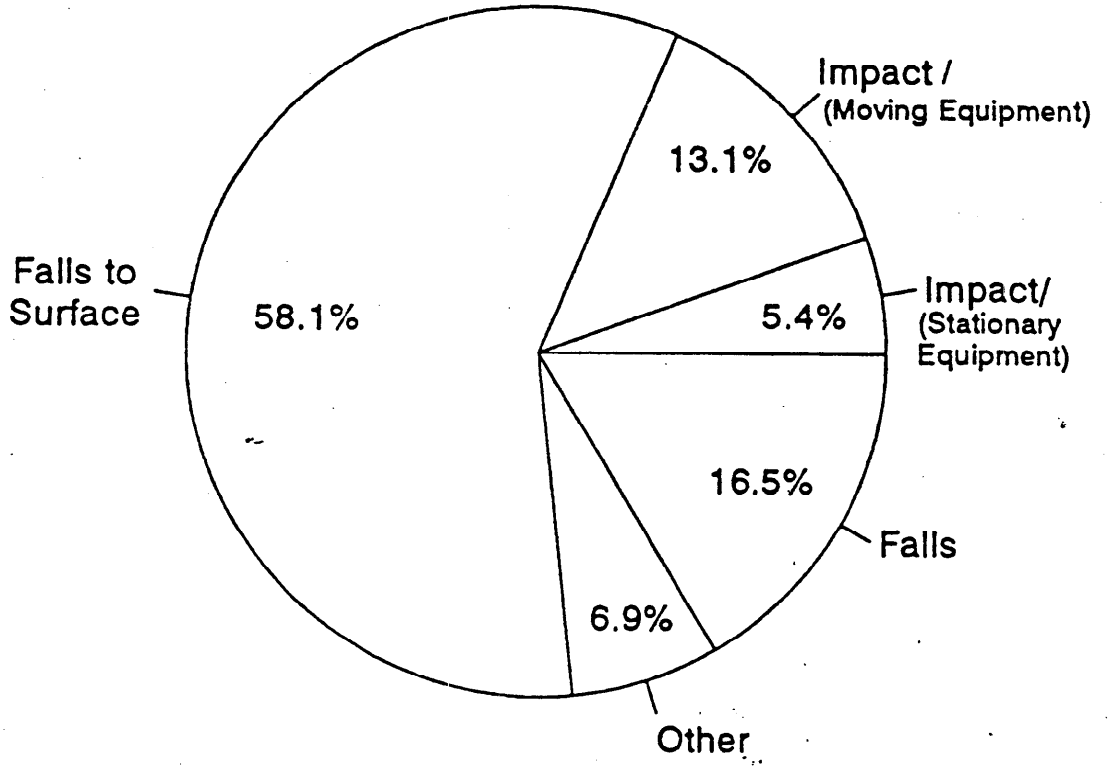
THE PLAYGROUND INJURY PROBLEM

Almost 22 million children in the United States are injured each year. An estimated 10 to 25% occur in and around schools. Over a two year period, approximately 80% of elementary school students will see a school nurse for injury related complaints. Many of these injuries involve playground equipment. In 1990, almost a quarter of a million children under age 15 were treated at hospital emergency rooms for injuries related to playground equipment.

Figure 1 shows that over half of playground injuries are the result of falls to the surface. Unfortunately, most of these surfaces are very hard such as asphalt and hard packed dirt or grass. Figure 2 compares playground related injuries between two age categories, those children under 6 years and those children 6 years and older. As you can see, injuries resulting from the various playground equipment change as children grow.

FIGURE 1: Incidents Involving Playground Equipment
Source: National Electronic Injury Surveillance System (NEISS), Special Study April-December 1990, U.S. Consumer Product Safety Commission.



FIVE STEPS IN DEVELOPING A SCHOOL INJURY PREVENTION PROGRAM

This part of the manual explains in detail the following steps used to develop and implement a playground injury prevention program at Chamisa Elementary School. As you read about these steps, please keep in mind the importance of adapting these steps to your school.

The steps are...

Step 1. Form a school playground safety committee

Step 2. Conduct a survey of playground injuries

Step 3. Develop an action plan for reducing playground injury

Step 4. Implement the injury prevention program

Step 5. Evaluate the plan by maintaining and reviewing injury statistics

Step 3. Develop an Action Plan for Reducing Playground Injury

The Playground Safety Committee's next task was to develop a plan based on the results of the survey and their experience with playground injuries. The Committee discussed contributing factors to our playground injuries and possible strategies to counteract these factors. Here are the most important problems we identified:

- Students' lack of awareness of proper and safe equipment use.
- Students' need for heightened safety awareness and their own responsibility for school safety measures.
- Students' lack of respect for lunchroom aides versus other school staff supervising on the playground.
- Students engaging in unsafe behavior, such as hanging by their knees from climbing apparatus, without adequate ground cover or surfacing.
- Staff inconsistency in knowledge and enforcement of playground rules.
- Old playground equipment in need of inspection and repair.
- Lack of proper ground cover.
- Certain times of year seem to be higher risk times -- beginning and end of school year, after the first snowfall and after spring break.

Knowing these problems, we brainstormed a list of possible solutions or intervention strategies. These solutions included:

- Rewrite playground guidelines and rules for equipment use. Write these rules to include students' behavior when they approach, use, and dismount from equipment. Highlight the potential hazards in the immediate area surrounding equipment.

- Designate the PE teacher as the person to teach proper and safe equipment use in PE classes the first week of school. Encourage the PE teacher to use the guidelines when teaching.

- Have all classroom teachers review playground rules and equipment use with students at the beginning of school.

- Have the school nurse teach safety awareness and injury prevention as part of the first aid classes for all first, third, fifth and sixth graders.

- Have the principal conduct an all-school assembly to inform students that any staff member supervising on the playground is there on the principal's behalf and thus deserves to be shown respect.

Dartmouth-Hitchcock Medical Center
Injury Prevention Resource and Research Center

Dartmouth Medical School
Hanover, NH 03755
(603) 650-1780
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Elaine Frank
Program Director

81

June 30, 1997

Mr. John D. Preston, P.E.
Directorate for Engineering Sciences
US Consumer Product Safety Commission
Washington, DC 20207

Re: Draft Revised Handbook for Public Playground Safety

Dear Mr. Preston:

First of all, let me say that I think you have done a wonderful job of incorporating most of the concerns that I heard raised at October's Round Table as well as my personal concerns regarding height limitations, the importance of maintaining protective surfacing and the inclusion of shredded tires as an alternative. I would, however, like to see tires added to Table 1 and Appendix D for comparative purposes.

I also want to point out that at least in NH, there is growing awareness of the issues surrounding playground safety. We are beginning Year Three of a three year Safe School Playground project with our Department of Education and have documented a tremendous increase in requests for information from schools and consumers regarding the issues. Thus, it is increasingly important that the Handbook be understandable to a broader range of individuals. In several places, I feel that a bit of explanation is needed to go along with the guidelines.

While reviewing the draft I made the following comments:

Additions / changes in italics

Introduction, para 5: "...adult supervision is *an essential component of a playground safety program.* However, it is recognized that this may not *always* be possible..."

Sec. 7.1, para 1: "...by a person *certified* to inspect playgrounds..."

Sec. 8.1, para 7: Please include something about preventing wood splinters through selection of wood and ongoing maintenance.

Sec. 9.2.1: *If so, corrective action must be taken.*

Sec. 9.4: I find this incomprehensible even with the figures.

Sec. 9.6.2: Please add a "why" sentence or phrase after the first sentence to explain what the issue is.

Sec. 9.7, para 1: *If removal is not immediately possible, these hazards should be made as visible as possible.*

81

Sec. 11.7: These seem to be a big rise. Are there steps between the platforms?

Sec. 12.1.5, para 2: "The space between adjacent rungs of *horizontal* ladders..." This avoids confusion with overhead rings.

Sec. 12.2, para 5: Please explain why a rod larger than 5/16 inch should not be able to penetrate openings...

Sec. 12.3, para 4: "This will help prevent limbs, *feet or hands...*

Sec. 12.4.3, para 6: "that does not encourage climbing, *or flipping over.*"

Sec. 12.4.7, para 1: add: "*and the inability to see whether anyone is on the slide before beginning a descent.*"

Finally, I would like to see something about the issue of simultaneous use of playgrounds by widely divergent aged kids. Is there a way to address that here?

Once again, thanks for all your work - past and future.

Sincerely,

Elaine Frank

Elaine Frank

ENGAN-TOOLEY
AND ASSOCIATES INC
MIRACLE RECREATION EQUIPMENT CO

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1-800-722-8546 • (517) 347-7970 • FAX 1-517-349-1911

Robert W. Tooley
President

Timothy J. Doyle
Vice-President

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. Preston:

After spending the last thirty-one years in the Parks and Recreation field in different capacities, I have never been as outraged about a group of individuals affecting the play of children in the history of our country.

The proposal of C.P.S.C. members to add a limit on the height of play equipment to eight feet is the most ridiculous and absurd proposal ever considered by this body. Any member supporting this proposal should voluntarily resign their position on this council due to the facts they do not have a clue as to what is safe, enjoyable and exciting play for our children.

Since neither ASTM F1487 nor the ASTM F1292 standards limits height of play equipment after all their thorough and detailed study and discussions. C.P.S.C. should concur and accept the work of this committee and their language.

Currently there are many protective surfacing materials, in varied price ranges, that are available for heights in excess of twelve feet that meet your own cushioning requirements, making it unnecessary to arbitrarily limit heights on play equipment.

After hearing of your proposed revisions to the "C.P.S.C. Handbook for Public Playground Safety", I personally visited a playground in Lansing, Michigan on Thursday, June 26, 1997, from 7:00 p.m. to 8:00 p.m. I observed this playground with it's two play structures because it consisted of many play activities ranging in height from 3' to 12'. Nine children, ranging in age from approximately two to ten, and four adults played on the structure. During this time, not one individual used a slide with a platform height of ten feet or less in the proper manner, i.e. sliding from the platform to the ground, even though six slides were available. These slides were used many, many times by the children to run back onto the decks by running up the slide bedways. The two slides with platform heights of ten feet and twelve feet were constantly in use throughout the hour by <u>all</u> of the children and two of the adults in the proper manner. This hour of observation confirmed my experiences of the last thirty-one years, that is if you provide <u>safe</u>, <u>challenging</u> and <u>exciting</u> slides, the children will enjoy using them in the way they were intended.

I could describe enough feedback on unchallenging play structures to fill a book, but the two best descriptions I have been given by young children for not wanting to play on their $75,000.00 play structure was that it was "built for babies to play on" and that it was "totally B-O-R-I-N-G".

I also have never been made aware of injury data, while I have been in the field, to support the height limitations for school age children that you are considering.

Please, please, please do not limit the height to 8' for play equipment, this only limits the children.

Sincerely,

Robert W. Tooley, President

Churchich Recreation

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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
Besthesda, MD. 20814-4408

Dear Mr. Preston,

I have been a manufacturers representative for America's leading manufacturer of heavy duty park and playground equipment for 23 years. These years have seen many good changes to the playground industry. However, I am troubled by the proposed changes of the CPSC Handbook for Public Playground Safety as it relates to "Height Limitation for School Age Children", "Lower Horizontal Ladders and Overhead Rings", "Climbing Ropes" and the "Stability" issue.

I will elaborate on each issue as follows:

1. "Height Limitation"-You may recall that Dr. James Peterson, past President of NRPA and a member of the CPSC/ASTM Playground Standards Committee, states that "Height is a Function of the Surface". In other words, if the surface has good shock absorbent qualities(as verified by independent testing of weighted head forms from varying heights) height in and of itself need not be restricted. Our ASTM F1487 and ASTM F1292 standards do not limit the height of play equipment. Lets keep both CPSC and ASTM on the same page! Our customers do not want to limit the play value of todays equipment. CPSC and the manufacturers, have done a good job of educating the customer on the need for having good absorbent surfacing for all equipment. I do not know of any injury with regards to height when proper surfacing was installed and maintained. Truly then "Height is a Function of the Surface".

2. "Horizontal Ladders and Overhead Rings"-Our regional physical education instructors tell me that the American child is weaker than our European counter part. All school age children need to be challenged! Lowering the height of this equipment will not allow the 4th through 6th grade child to use the equipment properly! Their feet will drag at the surfacing. Secondly, it is important that ladders are included at one end of this class of equipment. Otherwise, you limit the use of this type of equipment to be used by the oldest age group. We need to "challenge" all ages and not make certain groups feel inferior.

3. "Climbing Ropes"-I would recommend the CPSC adopt the ASTM F1487 provision that ropes be anchored at both ends. Also, adopt the revision, in

progress, that would not allow a loop to be formed in the rope that could allow a child's neck to be wrapped around it.

4. "Stability"-The issue of having footings inspected by building code officials is absurd! I do not know of a single government entity that now requires this inspection! I have never know a structure to fail, collapse, etc. Therefore, the stability issue should be stricken from the guidelines.

Thank you for your consideration of these very important issues.

Sincerely,

Bob Churchich
President

BC:bc

Paul Labieniec
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June 30, 1997

Mr. John D. Preston, P.E.
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U.S. Consumer Product Safety Commission
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Subject: Responses to Proposed Changes to the Handbook for Public Playground Safety

Dear Mr. John D. Preston,

I would like to make the following comments on the proposed changes to the handbook:

Section 4.3.1: Height Limitation for School Age Children

1. 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.
2. Neither the ASTM F1487 nor the ASTM F1292 standard limits heights of play equipment. CPSC should accept the work of these groups and harmonize its handbook contents with ASTM.
3. There are thousands of items, such as slides, that are taller than 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 opportunity for injuries if there were truly any hazard associated with the height. There is no injury data to support the CPSC's position.
4. Limiting the height to 8 feet tremendously reduces the play value of the equipment.

Section 12.1.5: Horizontal Ladders and Overhead Rings

1. If horizontal ladders are lowered from 84" to 78", they will be too low to be used by 4th, 5th and 6th graders, who will be dragging their feet.
2. This section also 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 users to use the equipment.

Section 12.1.7: Climbing Ropes

1. The CPSC draft is eliminating the use of climbing ropes because of the potential for strangulation.
2. ASTM F1487 currently requires that climbing ropes be securely anchored on both ends.
3. There is a revision to the ASTM standard in progress that would require that no loop could be formed which would be large enough to allow it to be wrapped around a child's neck.
4. Recommend that CPSC adopt the current and proposed ASTM provisions on climbing ropes.

Section 7.1.1: Stability

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

Sincerely,

Paul Labieniec

Gazaway & Associates

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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. Preston,

This letter is in regards to the revisions being proposed for the CPSC Handbook for Public Playground Safety.

I have been in the playground industry for the last 8 years as a sub-representative for Miracle Recreation Equipment Company in Iowa. In dealing with the playground committee's for schools and cities, I have received a great deal of feedback in regards to the increased play value that the higher slides provide for children of all ages. These committee members almost always take children to existing sites to see for themselves what play components the children like best and how they play on the equipment. The remarks are overwhelming that the children like the excitement of the higher equipment, especially the slides, and play on the lower equipment inappropriately so as to create their own excitement. The creating of their own excitement is where the falls and injuries occur. For this reason, we need to continue to provide the equipment that provides the best play value available, i.e. higher slides.

The changes made by the CPSC in the past have done a great deal to provide safety to the play equipment without limiting the play value needed by the children. Recommending safety surface be provided under all equipment and lessoning the spacing for head entrapment are a few ways that have increased safety without limiting the play value and challenge that children look for in play equipment. A height restriction will only lesson the play value and challenge and increase the likelihood of children playing on the equipment in ways that it is not intended.

I appreciate your taking the time to read this letter. I would be happy to discuss this issue further with you at your convenience.

Sincerely,

Mark Boland

Mark Boland

FAX

Date: Monday, June 30, 1997 **Time:** 10:55:48 AM 3 **Pages**

To: Mr. John Preston P.E.
U.S. Consumer Product Satety Commission

Fax: 301-504-0533
Voice:

From: Michael Rivard
PlayPower, Inc.

Fax: 314-984-8264
Voice: 314-984-9201

Comments:

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:

Upon reading the proposed changes to the CPSC Handbook for Public Playground Safety, I have several concerns that I would like to express. As a father of three children ranging in ages from 8 to 2, I spend a lot of time at public playgrounds. My children are very active climbers and have benefited from several new playground installations near our home. However, I feel some of the proposed changes you are making will have a negative impact on playgrounds and potentially limit the fun for all children.

The first change I would like to address is in Section 4.3.1 - *Recommended Maximum Accessible Height.* The Draft states that the highest accessible part of the equipment for school age children is to be eight (8) feet. I do not understand the need to limit the height at all. The issue is not how high the equipment is, but rather ensuring adequate impact absorbing surfacing is under and around the equipment. Both the draft and the current edition (1994) of the Handbook show in the table of Critical Height of Tested Materials that there are many surfacing materials of various types and depths that provide the necessary fall protection for equipment as high as 12 feet. If adequate surfacing materials exist, the decision to limit the height of the equipment seems unnecessary.

Additionally, the choice to limit the equipment height to 8 feet seems arbitrary. In fact, by limiting the height of the playground equipment, you might be increasing the chance of serious injury. I know if my children play on a playground that is not exciting or challenging enough for them, they try to make it challenging. In other words, they would climb on non-designated play surfaces. If the surfacing is designed only for the 8-foot height, they could fall from a higher point and seriously injure themselves. I believe a playground with higher equipment that provides more thrill, challenge and play value will limit there exploration beyond the playgrounds boundaries and keep them safer. After reviewing the New Zealand study that was references, I felt it was inconclusive with respect to height of equipment. The study did not draw a direct correlation between the height of playground equipment and injury. If anything, the study emphasized my point above, the lack of adequate surfacing is the cause of most injuries, not the height of the equipment. While I do not have any research to support this point, I would suggest, a fall from any height, whether it was 1 foot, 8 feet or 12 feet, could cause a serious injury if the proper surfacing material was not in place.

It was my understanding, the rationale for a lot of the changes to the CPSC Handbook was to bring the guidelines closer in line with the ASTM guidelines. The ASTM Public Playground Safety Standard F1487 contains no maximum height limitations for slides or

platforms. It was logically and correctly concluded that as long as there is the proper type and depth of safety surfacing under and around the equipment, no maximum height would be necessary to prevent serious injury. The fact that this distinguished group carefully and objectively looked at the evidence and determined that height limitations were not necessary should not be ignored.

Another area of concern relates to section 12.1.5 - *Horizontal Ladders and Overhead Rings*. I do not feel that the reduction in allowable height for horizontal ladders and overhead rings from 84" to 78" is justified for the following reasons. First, ASTM F1487 and the North American Harmonization Draft Standard both contain 84" as the maximum height. This was based on anthropometric data presented to the group by Debbie Tinsworth of the CPSC staff. This data showed that a 84" maximum height allowed a maximum user (95th percentile 12-year-old) to use the equipment with proper ground clearance for his feet. Second, I have difficulty believing that lowering the height by six (6") inches would have an effect on the quantity and types of injuries on this type of equipment. Finally Susan Antle has indicated in a report to the ASTM subcommittee that when horizontal ladders were lowered to 78", they were too low to be used by 4th, 5th and 6th graders in her schools and they had to be restored to their original height of 84". This section also 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 to use the equipment.

Concerning section 7.1 - *Assembly and Installation,* I question whether the infrastructure is in place to support this recommendation. This section requires that after assembly, new equipment should be inspected before its first use "by a person qualified to inspect playgrounds for safety". This also raises the questions: "How does one determine who is qualified?" and "Does this mean a CPSI?" This kind of general statement can be confusing to playground purchasers and recommend that it be deleted. On a related topic Section 7.1.1- *Stability* could also cause confusion. 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 do not have inspectors qualified to perform the inspections. I recommend that this statement be removed so that we do not encourage more locales to adopt a policy of this type.

I appreciate you taking the time to read my concerns. I am a firm believer that playground safety guidelines are needed. However, we must also remember why playgrounds are built. So children can have fun. While all the above issues are important, the one I feel most strongly about is the height limitation. While safe fun is the best kind of fun, the focus should be on the protective surfacing and not the height of the equipment. If you won't believe me, maybe the words of my 3-year-old will convince you. Every time I take her to the park she always asks, "can I go higher daddy". Please don't take away the thrill.

Sincerely,

Michael Rivard

Miracle Playground Sales
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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

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 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,

Jim Spence
Miracle Playground Sales

Joan M. Denzak
376 Louvaine Drive
Buffalo, New York 14223

June 30, 1997

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

Dear Mr. Preston:

I am writing this in answer to your proposal to change some of the guidelines for Public Playground Safety.

Besides being a parent that raised 9 children, I have also been associated with children's recreation on a professional basis. I believe that we should be protective, not overprotective, of our children. When we take away their fun and learning experiences, we are challenging them to find other forms of recreation. Unfortunately, some forms may be much more dangerous than play equipment! Older children will not enjoy playing on equipment designed for small children. I don't believe that the height of the playground equipment should be an issue. I believe it is the surfacing that is the major factor. Surely you must realize the possibly of a severe injury from even a height of 4' or less.

Let's make the playground safe by adhering to the surfacing criteria, not lowering the height of the equipment!

Sincerely,

Joan M. Denzak

Joan M. Denzak

Chesapeake VIRGINIA

City of Chesapeake

Parks and Recreation Department
P.O. Box 15225
Chesapeake, Virginia 23328
(757) 382-6411
FAX 382-8418

June 30,1997

Dear Mr. Preston:

I am a recreation professional, who has been in the field since 1969. I have seen many changes in our profession. The greatest change has been the need to protect society from themselves. I commend the CPSC for their efforts to produce a handbook for public playground safety.

I wish to make the following comments on your recent proposed revisions:

* Height Limitation for School Age Children as 8' high
  This may or may not protect the child from injuries but it will eliminate the older children from a challenge and worth while play experience. This is why most playgrounds have two areas of play equipment. One is for the tot and one for the older child.

* Horizontal Ladders and Overhead Rings lowered 84" to 78"
  If you lower these areas you are removing the play opportunity for 4th, 5th and 6th graders.

* Climbing Ropes eliminated because of potential for strangulation
  This equipment should designed so that it would not allow this to accrue. Strangulation can happen from a child's clothing as well.

* Stability of footing may be required to be inspected by building code officials
  Our city is one of the fastest growing areas in Virginia and the nation. It is very difficult to receive timely inspections on City building codes. There could be more cost and injuries while waiting for an official of the City to inspect.

I hope that you will take into concern that children need challenges and fun. If your organization removes these opportunities from them they will find it in other places. These places may not be supervised and safe. Parents must be charged to parent their child and officials must be allowed to offer all children play experience. Please don't take this away from us

Sincerely,

Judy N. Alexander

Judy N. Alexander
Recreation Superintendent

"The City of Chesapeake adheres to the principles of equal employment opportunity. This policy extends to all programs and services supported by the City."

MID ATLANTIC PARK AND PLAYGROUND CONCEPTS
P.O. Box 710 • Tunkhannock, Pennsylvania 18657
Phone (717) 836-8037 • (800) 392-8736 • Fax (717) 836-6597

June 27, 1997

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

Dear Sir:

It has come to my attention that the CPSC is soliciting comments on the proposed changes to the handbook for Public Playground Safety. Being involved in the playground industry and priding myself on my knowledge and concern for safety, I would like to voice my opinion.

I will address four sections of Proposed Revisions in numerical order.
#1 Section 4.3.1 Height Limitations for School Age Children. I disagree with this revision for the following reasons: Height is a function of the amount of protective surfacing. As per your critical height table in Section 10.4 of the Handbook, 12" of uncompressed depth of wood mulch double shredded bark mulch, uniform wood chips, fine sand and fine gravel "provide the necessary safety for equipment of various heights". The shock absorbing properties of these materials show a better critical fall height than that of 8 feet. The other standards set by ASTM do not limit the heights of equipment. I have yet to see any documentation on injuries of equipment above 8 feet that justify this revision. There are a lot of older free standing slides in circulation along with other equipment that would supply sufficient data if there was a problem. Whether your equipment is 3 feet, 5 feet, 8 feet, or 12 feet, if you do not have the proper surfacing you can cause head injuries. Why not limit playground equipment to surface level activities? Do not penalize the children, the communities and other groups who adhere to your surfacing safety guidelines because there are people who do not follow your guidelines. Why not stress more importance on surfacing? Higher equipment keeps the interest of the older children in the school age group and brings them back into the playground instead of out on the street possibly injuring themselves or someone else severely. Because of these reasons, the playgrounds need to remain challenging and interesting to the older children. . I do not believe that you can allow

special interest groups to pressure you into this decision without looking at the effect on the whole of society and sincerely hope that you will rethink this revision.

Section 7.1.1 Stability. I think most major manufacturers stress the importance of the footing in their installation instructions. Most localities do not have a code for this and you would be opening a can of worms. How are you able to set guidelines on this due to so many geographical variables? It could lead to another bureaucratic step to raise the cost of equipment through government inspection. Is there data available to support such a statement?

Section 12.5.5 Overhead Ladders. Again, I think this can be addressed by the protective surfacing issue. Why lower the overhead so the older children are not able to use them because their feet are dragging on the ground? It will make it easier to climb on top of the overhead thus using the equipment incorrectly. The proposition of taking away the end ladders for the freestanding equipment will make it usable only by taller children. There may be children in the same age group of a smaller size which may be discriminated against because access is denied due to their size.

Section 12.1.7 Climbing Ropes. I do think this area should be addressed, but perhaps not eliminated. Why not consider something like the proposed revision ASTM is considering?

Thank you for the opportunity to express my opinion. I hope these suggestions will be taken constructively. I strongly feel that taking away the height of equipment is going to take away the fun for the older children. Playgrounds can be positive recreation areas. Lets keep our children playing as long as possible so their minds and values can develop before the mix with the streets. If height is a concern, let's address the importance of protective surfacing. Feel free to contact me at your convenience if you have any questions or follow up to my suggestions.

Sincerely,

William J. Gibbons
President
Mid Atlantic Park and Playground Concepts

June 30, 1997

Mr. John Preston, P.E.
Directorate for Engineering Sciences
US CPSC
4330 East West Highway, Ste 611
Bethesda, MD 20814-4408
301-504-0533fax

RE: Public Comments On Changes

Dear Mr. Preston:

I would like to comment on the proposed changes of the CPSC Handbook for Public Playground Safety. I am a concerned parent as well as an uncle (9 nieces 2 nephews 1 child ages 2-12) who often takes my children & nieces/nephews to public playgrounds.

Section 4.3.1 Height Limitations For School Age Children

*Manufacturers of safety surface have protective surfacing for heights in excess of 12 feet that meet CPSC's own cushioning requirements. I don't believe it is necessary to arbitrarily limit heights.
*My family and extended family enjoy taking their children to fun & exciting playgrounds. Safety, Compliance to current standards and Large spiral slides are a major consideration when we select a playground to go and visit.
*There are thousands of playactivities, such as slides, that are taller than the draft recommendations that have been in the field for many years. These items have been used by hundreds of children every day without substantial injuries. To my knowledge there is NO DATA to supports CPSC'S position.
*Neither ASTM F1487 nor ASTM F1292 Limits heights of play ground equipment. I believe CPSC should accept the works of these groups and harmonize its Handbook's contents.

Section 7.1.1 Stability

*I don't believe most locations have the resources nor qualified employees to perform these inspections. Please remove this statement so we do not encourage more locales to adopt a policy of this type.

Section 12.1.5 Horizontal Ladders and Overhead Rings

*I don't believe these items should be lowered. They would be to low for 4th 5th and 6th graders who would then be dragger there feet. This is an appropriate physical activity for those age groups which then would become non appropriate.
*In addition I could not imagine children being able to access the horizontal components with out using some sort of end ladder.

Section 12.1.7 Climbing Ropes

*These items are fun and challenging. I believe if they are sacured on both ends and all of the flexibility taken out of them as proposed with the ASTM revision. Than they are plenty safe too.
*Please review, adopt and harmonize your changes with ASTM in order to provide the public a STANDARD IN PUBLIC PLAYGROUND SAFETY.

Thank you for your time and consideration.

John W. Hollerbach 50 Smallwood Rd. W. Hartford Ct 06107

Garrett & Company, Inc.

P.O. Box 57426
Murray, Utah 84157
Telephone (801) 265-8443 Fax (801) 263-1264

6-30-97

Mr. John 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:

We are a sales organization who currently market playground equipment products for Miracle Recreation Co. in 4 Western States. We have been made aware that some proposed revisions are currently being looked at, and we would like to give some response if possible.

Section 4.3.1: Height Limitations for School Age Children

A large majority of our customers appreciate the offering Miracle currently has because of the different heights of slides offered. Play value is significant when a municipality or school is spending money in the amounts required today for appropriate playground equipment. We have watched children for extended periods of time on our play systems, and without fail the larger slides are the main attraction. Interestingly, we have seen more children fall from our 3' decks, and none from our higher slides. I believe that when a child is using our higher slides, they are more cautious than when they are at the 3' level. In large groups of children, when selecting playground equipment, the children regularly select some of our largest slides. We would appreciate any data substanciating that more accidents occur on a higher slide versus a 3' deck, if appropriate surfacing is in the play area. We also market a wood fiber material for surfacing, and the "impact intenuation" at a 12' height is 127. C.P.S.C. requires that it be below 200. With this in mind, is not proper surfacing the critical issue here, not "height limitations? We have several of the large slides installed in our four state area, and in 12 years, I have yet to hear of an injury recieved on one of these slides when proper surfacing is installed. I would sincerely ask that you give this serious consideration in that the record bears out these slides are extremely popular, and injury if very minimal with proper surfacing. The ASTM standard currently does not have any kind of height limitation, and we feel their standard is very safety oriented. We would again ask that documented data be reviewed before considering this proposed change, and a stronger emphasis be placed on appropriate surfacing. One of the biggest complaints we have in this industry is that everything is becoming so simular, and it is taking the "fun" out of it for children. Our large slides are one of the few items remaining which I feel give children "true creative play". Thank you for your consideration particularly on this item.

Section 7.1.1: Stability

We regularly review installation procedures with our customers and make them aware of what an appropriate footings consists of. The requirement of having these inspected by a building code official would be very tedious and time consuming for our installers, and our local customers who install their own equipment. Not only are our footings quite substantial when installed properly, but the systems literally stand erect and quite solid before concrete is poured. I personally feel this is an area that need not be an area of concern, unless there have been blatent violations, ie. (no footing at all)

Section 12.1.5: Horiz. Ladders and Overhead Rings

Deleting rungs at the end of this type of freestanding equipment would very much limit the use of this equipment for younger children. At this time we would again ask that the issue of surfacing be addressed versus the removal of rungs.

Thank you for your consideration, and please feel free to call if you would be interested in any other observations we have had in the field concerning the use of this equipment.

Sincerely,

Vern Garrett

Vern Garrett

Garrett & Company, Inc.

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Murray, Utah 84157
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