

July 17, 2023

TRANSMITTED VIA EMAIL

Mr. Harvey Voris  
Chairman Subcommittee F08.30 Fitness Products  
HCV Consulting LLC  
Huntington Beach, CA 92646

Dear Mr. Voris:

This letter is the U.S. Consumer Product Safety Commission (CPSC) staff's<sup>1</sup> comment to ballot F08 (23-03), Item 5, which proposes requirements for ASTM F2276 – 10, *Standard Specification for Fitness Equipment*, that owner's manuals for fitness equipment "shall be made available" to the consumer. Currently, the standard requires that owner's manuals "shall be provided" with the product. The ballot proposal effectively gives manufacturers the option to provide owner's manuals via online digital formats only.

Staff is concerned that only providing the owner's manuals online may reduce the likelihood consumers will take the extra steps necessary to access the information contained in the manual, especially in cases where consumers have limited access to the internet or a limited ability to use the internet, or if the manual is difficult to find on the manufacturer's website. Moreover, some consumers may arrange for the fitness product to be assembled by a professional, and therefore conclude that they have no need for assembly instructions, making it less likely they will download the owner's manual online—whereas the installer would be expected to leave a manufacturer-supplied print manual for the consumer. Staff is also concerned that allowing the digital manual to be removed from the manufacturers' online resources after 7 years would mean that a consumer who purchases a fitness product secondhand would be unable to obtain the documentation at all. Staff therefore recommends that owner's manuals be required to be provided with the product in print form, in addition to making it available digitally indefinitely online, to ensure consumers have access to the information on how to use their product properly and safely.

CPSC staff looks forward to continuing to collaborate with ASTM to develop requirements to increase the safety of fitness products.

Sincerely,



Frederick deGrano  
*Mechanical Engineer*  
*Directorate for Engineering Sciences*

cc: Jacqueline Campbell, CPSC Voluntary Standards Coordinator  
Joe Koury, ASTM F08 Staff Manager

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<sup>1</sup> The views or opinions expressed in this letter are solely those of the staff, and do not necessarily represent those of the Commission.