



November 2, 2022

Ms. Joan Lawrence, ASTM F15.22 Subcommittee Chair  
Mr. Al Kaufman, ASTM F15.22 Task Group Chair  
ASTM International  
100 Barr Harbor Drive  
West Conshohocken, PA 19428

Dear Ms. Lawrence and Mr. Kaufman:

In recent years, motorized ride-on toys have become more sophisticated, making them more difficult to differentiate from other vehicles like youth all-terrain vehicles (Y-ATV), as defined in ANSI/SVIA 1-2017, *American National Standard for Four Wheel All-Terrain Vehicles*. Although the current ASTM F963-17 safety standard has requirements for testing ride-on toys, the standard does not have a definition for ride-on toys that would better define their scope.

Given the unclear delineation of ride-on toys in relation to Y-ATVs, CPSC staff<sup>[1]</sup> is in the process of drafting guidance to classify a product as a ride-on toy, or a Y-ATV. Staff considered several factors, such as tire pressure, suspension, marketing, and maximum operational speed, to distinguish the two product categories.

Staff assesses that the definition of a ride-on toy should contain some of the following characteristics:

- Plastic wheels, or four (4) “high-pressure” tires
  - “High pressure,” meaning greater than 10 pounds per square inch (> 10 psi) of operational tire pressure.
  - If “operational tire pressure” is NOT stated explicitly on the tire(s) themselves, the vehicle body, or within the instruction manual—then any tire pressure located on the tires should be considered the operational pressure for this measure.
- No structural suspension members intended to reduce road harshness and/or improve steering response, or other forms of ride dampening control in any configuration

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<sup>[1]</sup> The views expressed in this letter are those of CPSC staff, and they have not been reviewed or approved by, and may not necessarily reflect the views, of the Commission.



- Marketed as a ride-on toy or equivalent language.
  - If the manufacturer markets the ride-on toy openly to the public as a Y-ATV, or if the ride-on toy has labeling supporting a Y-ATV designation, or the shipping materials are labeled as a Y-ATV, then the vehicle should be tested as it is being represented by the manufacturer.

Additionally, CPSC staff recommends that ASTM consider adopting maximum speed requirements for ride-on toys, similar to EN 71-1: *Safety of toys – Part 1: Mechanical and Physical properties*, ride-on “toys intended for children over 3 years, but under 6 years”; the speed limitations are for 6 km/h (3.7 mph) or 8.2 km/h (5.1 mph), as long as the “toy is equipped with a two-position device that limits the maximum design speed to 6 km/h (3.7 mph) or less in one position, and 8.2 km/h (5.1 mph) in the other position. Ride-on toys intended for children of 6 years and older shall be limited to 16 km/h (9.9 mph). Additional discussion should occur regarding the rationale for these speed limits.

CPSC staff is concerned that ride-on toys will continue to evolve in complexity, making differentiation among similar products more challenging for firms in the toy industry. CPSC staff requests ASTM to take immediate action to define the scope of ride-on toys better and include appropriate product specifications and/or performance requirements to differentiate ride-on toys from other off-road vehicle types that would not be considered within the scope of F963.

CPSC requests that the toy safety F15.22 subcommittee review the enclosure and work to adopt these criteria for ride-on toys. If you have any questions, or need additional information, you can contact me at: [bmordecai@cpsc.gov](mailto:bmordecai@cpsc.gov), or at: (301) 987-2506.

Sincerely,

*Benjamin Mordecai*

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Project Manager, F963

Cc: Molly Lynyak, ASTM F15 Staff Manager  
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