



March 6, 2025

Catherine Mills-Reynolds

Task Group Lead

International Code Council and American Fence Association Gates Task Group

[Catherine@americanfenceassociation.com](mailto:Catherine@americanfenceassociation.com)

Dear Ms. Mills-Reynolds,

The U.S. Consumer Product Safety Commission (CPSC) is an independent federal regulatory agency charged with protecting the public from hazardous consumer products. CPSC has jurisdiction over approximately 15,000 categories of consumer products ranging from juvenile products to off-highway vehicles to portable fuel containers to home appliances. As part of this charge, CPSC staff<sup>1</sup> strives to help protect children from hidden hazards. Your task group recently submitted a series of code change proposals to the International Code Council (ICC) I-Codes to improve safety related to gates installed in openings greater than 48 inches. These proposals included two proposals to the International Residential Code (IRC), and one proposal each to the International Property Maintenance Code (IPMC), the International Building Code (IBC), and the International Existing Building Code (IEBC).

CPSC staff reviewed your task group's proposals, which largely add requirements to meet ASTM F900<sup>2</sup> *Standard Specification for Industrial and Commercial Steel Swing Gates*, ASTM F1184 *Standard Specification for Industrial and Commercial Horizontal Slide Gates*, ASTM F2200 *Standard Specification for Automated Vehicular Gate Construction* and UL 325 *Door, Drapery, Gate, Louver, and Window Operators and Systems*, where appropriate. Your reason statements explain the safety risks posed particularly to children, identifying, as an example, an incident involving a 7-year old in 2019. CPSC staff reviewed data documenting gate-safety incidents and met with you and other advocates. CPSC staff agrees that gate safety is an issue that should be addressed and supports your proposals to incorporate these voluntary consensus standards into the appropriate I-Codes. Furthermore, CPSC staff will monitor these voluntary consensus standards, watch for future issues, and will participate, as able, in any future standards work as appropriate.

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

<sup>2</sup> CPSC staff believe that ASTM, Int and UL Standards and Engagement will work with the ICC to ensure the most recent editions of each voluntary standard are referenced.



United States  
**Consumer Product Safety Commission**

I ask that you share this letter with each of the appropriate committees so that they are aware of our support and interest as they deliberate on your proposals. If you or anyone else need to contact us, you can reach out to me at [sayers@cpsc.gov](mailto:sayers@cpsc.gov) or Daniel Taxier at [dtaxier@cpsc.gov](mailto:dtaxier@cpsc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "S. Ayers".

Scott Ayers, P.E.  
Building Code, Designated Representative  
Directorate for Engineering Sciences  
CPSC

CC:

Daniel Taxier – CPSC Children’s Program Area Manager  
Jacqueline Campbell – CPSC Voluntary Standards Coordinator  
Kevin McOsker – ICC Liaison