

U.S. CONSUMER PRODUCT SAFETY COMMISSION

5 Research Place, Rockville MD 20850

July X, 2020

TRANSMITTED VIA EMAIL

Ken Kutska

ASTM International

100 Barr Harbor Dr.

West Conshohocken, PA 19428-2959

Re: ASTM Ballot F15 (20-06), Item 12, Ballot Item for Banister Rails/Gliders; F1487-17 *Standard Consumer Safety Performance Specification for Playground Equipment for Public Use*

Dear Mr. Kutska:

As the Voluntary Standards Coordinator at CPSC, I am writing to discuss my[[1]](#footnote-1) concern regarding ballot Item 12 from ASTM F15 (20-06) ballot. This ballot was issued on June 1, 2020 and closes on July 13, 2020. When reviewing the ballot, item 12 appears to contain a minor revision to section 6.12 “Banister Rails/Gliders” from F1487 *Standard Consumer Safety Performance Specification for Playground Equipment for Public Use.* Yet, the current version of the standard, ASTM F1487-17, does not contain a section 6.12 nor any section on banister rails/gliders and therefore, I am questioning why ASTM is issuing a ballot item to revise it.

A previous ballot, F15 (20-03), issued on March 30, 2020, contained an item which, if approved, would add new definitions and many requirements for banister rails/glider products, a new product category to the standard. There were several negative votes on the March 30th ballot item and while many were either withdrawn or found to be non-persuasive during the last F15.29 subcommittee meeting, those non-persuasive negative votes have not, as of yet, been resolved.

The current ballot, F15 (20-06), contains five items to resolve the non-persuasive negative votes and, as mentioned previously, also contains a revision to section 6.12, which doesn’t yet exist because it hasn’t been approved by ASTM. Until the current ballot closes, and the negatives from the previous ballot are all resolved and approved by ASTM’s Committee on Standards, the negatives remain unresolved and therefore the original ballot item has not been approved.

I have been informed that simultaneously balloting these ballots items, while highly unusual, is not prohibited under ASTM procedures. Although technically it is allowed, one can see how it can cause confusion to the members of F15 who may not fully appreciate what they are voting on. Therefore, CPSC staff is requesting that ballot item 12 be withdrawn until the language being revised is in an approved and published standard.

CPSC staff is also concerned about the technical merits of the ballot item itself, and those concerns are addressed in a separate letter from Kevin Lee, CPSC’s expert on playground systems.

Sincerely,

Patricia Edwards

Voluntary Standards Coordinator

CC: Kevin Lee, Mechanical Engineer, CPSC

Molly Lynyak, ASTM International

1. Any views or opinions expressed in this letter are solely those of the author and do not necessarily represent those of the U.S. Consumer Product Safety Commission. [↑](#footnote-ref-1)