

July 17, 2025

TRANSMITTED VIA EMAIL

Ms. Teri Hendy
Technical Contact for WK95293
Mr. Kenneth Kutska
Subcommittee Chair
ASTM F15.29 Public Playgrounds Subcommittee
100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

Dear Ms. Hendy and Mr. Kutska,

U.S. Consumer Product Safety Commission (CPSC) staff¹ is concerned that the proposal to exempt certain projections from entanglement hazard performance requirements in ASTM F1487-25 *Standard Consumer Safety Performance Specification for Playground Equipment for Public Use* will create a reduction in safety on public playgrounds. The proposal in Ballot Item F15 (25-13) Item 5 exempts vertical projections and projections that increase in size from their initial surface from entanglement requirements when their height is 27 inches or less from the underlying surface. The purpose of the proposed change appears to be to minimize design changes to certain attachment points for manipulative components on ground-level play tables (e.g., mallets) and allow for more with 24 inches of clearance beneath such tables to align with ADA requirements. As rationale, the ballot item notes that most 2-year-olds and older children would be able to stand with their feet on the ground.

The ability of a child to stand on the ground does not negate the strangulation hazard. Compression of the neck region leading to sustained pressure on the neck in an area close to the carotid arteries can cause unconsciousness in 10-15 seconds and death within two to three minutes. Experimental studies in adults have shown that as little as 2 kg (4.4 lbs.) on the neck may occlude the jugular vein² and 3-5 kg (7-11 lbs.) may occlude the common carotid arteries.^{3,4} This can occur even in situations where the body is fully or partially supported. This is a noted hazard pattern for products such as window covering cords (see 87 FR 72877)⁵ and cribs (see 75 FR 81768).⁶ Notably, like ASTM F1487-25, the voluntary standards for these products currently address the potential for strangulation. Other incidents on

¹ The comments in this letter are those of the CPSC staff and have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

² Brouardel. La Pendaion. La strangulation, la suffocation, la submersion. Paris, France, 1897.

³ Ibid.

⁴ Polson CJ. Hanging In: Polson CJ and Gee DJ (eds.) Essentials of forensic medicine Oxford England, 1973 371-404.

⁵ <https://www.federalregister.gov/d/2022-25040/p-32>.

⁶ <https://www.federalregister.gov/d/2010-32178/p-50>.



Saferproducts.gov also illustrate that strangulation can happen when a child's feet can reach the ground.⁷ Staff can provide a more detailed summary of relevant incidents to the subcommittee on request. The subcommittee should not ignore the possibility that children younger than 2-years-old could be present on public playgrounds for children age 2 and up. Additionally, a child in a wheelchair could also be at risk; one such scenario is if the child is able to turn to the side or away from the ground-level table while a cord around the child's neck is entangled on a protrusion.

Staff concludes that the proposal would reduce the safety of public playgrounds and has not seen evidence that there are not feasible design solutions that allow both 24 inches of clearance below ground-level play tables and that meet the current ASTM F1487-25 entanglement requirements. Therefore, staff recommends the subcommittee not adopt the proposed change.

Sincerely,

Andrew Newens

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Daniel Taxier, CPSC Children's Program Manager
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Don Mays, ASTM F15 Chair

⁷ See for example: <https://saferproducts.gov/PublicSearch/Detail?ReportId=4625676>.