



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

Kevin Lee
Mechanical Engineer
Division of Mechanical and Combustion Engineering
Directorate for Engineering Sciences

Tel: 301-987-2486
Email: klee@cpsc.gov

TRANSMITTED VIA EMAIL

January 13, 2021

Mr. Ken Kutska
ASTM International
100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

Re: ASTM Ballot F15 (20-13), Item 16, for Banister Rails/Gliders; F1487-17 *Standard Consumer Safety Performance Specification for Playground Equipment for Public Use*

Dear Mr. Kutska:

This letter is CPSC staff's¹ response to ballot Item 16 from the ASTM F15 (20-13) ballot on ASTM F1487-17 *Standard Consumer Safety Performance Specification for Playground Equipment for Public Use*. I am voting negative on this ballot item with the following comments. As I have stated in past ballot vote comments, as well as during recent subcommittee meetings, CPSC staff is concerned that allowing banister rail/glider products that are similar in design to a previously recalled glider (*see* CPSC's recall 12-109) would allow unsafe products to comply with ASTM F1487.

The ballot fails to address CPSC staff's primary concern that playground equipment that affords a feet-first sliding position is unsafe if there are no sides to the slide to prevent lateral discharge of the child user. Gliders compliant with the proposed ballot may exhibit the same fall hazard associated with a product that was recalled due to serious injuries to children including fractured arms and legs. Based on the injuries in these incidents, staff concludes that gliders that can be used in a feet-first sliding position should meet the slide requirements of ASTM F1487 to reduce the likelihood of lateral discharge and subsequent falls.

The ballot's rationale states: "banking" was left undefined due to variables such as the product's height, slope, shape and location of curvature, velocity of the user, and properties of the materials being used. However, as stated in my last letter, "sharp turns and banking" were not the reason for recalling the glider. Rather, it was the lack of sides to the chute/slide portion of the product.

I again request that this ballot be withdrawn while the ASTM subcommittee jointly examines the hazard patterns about which CPSC staff has consistently expressed concerns.

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

Sincerely,

Kevin K. Lee
Mechanical Engineer
Division of Mechanical and Combustion Engineering

CC: Patricia L. Edwards, CPSC Voluntary Standards Coordinator
Molly Lynyak, ASTM F15 Staff Manager, ASTM International