



United States
Consumer Product Safety Commission
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January 20, 2022

TRANSMITTED VIA EMAIL

Mr. Rolf Huber
ASTM International
100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

Re: ASTM Ballot F14 (21-02), Item 1, for Reapproval of F2049-2011(2017) *Safety Performance Specification for Fences/Barriers for Public, Commercial, and Multi-Family Residential Use Outdoor Play Areas*

Dear Mr. Huber:

This letter is the U.S. Consumer Product Safety Commission (CPSC) staff's¹ response to ballot Item 1 from the ASTM F14 (21-02) ballot on the reapproval of F2049-2011(2017) *Safety Performance Specification for Fences/Barriers for Public, Commercial, and Multi-Family Residential Use Outdoor Play Areas*. I abstain on this ballot item with the following comments.

The CPSC Public Playground Safety Handbook recommends the use of fencing that conforms to local building codes and/or ASTM F-2049, as a method to contain children within a playground where nearby accessible hazards such as lakes and road traffic pose a hazard to children.² ASTM F2049-11 specifies fencing requirements that consider anthropometric and developmental characteristics of children under twelve and accordingly limits spacing, size, and location of fence components to preclude a child from climbing over or passing through the fence.

Therefore, CPSC staff supports the reapproval of the current F2049 standard as a safety performance specification and does not support efforts to convert the standard into a guidance document.

Sincerely,

Kevin K. Lee
Mechanical Engineer

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.

² Section 2. General Playground Considerations of CPSC Public Playground Safety Handbook. Retrieved from: [Public Playground Safety Handbook | CPSC.gov](#)

Division of Mechanical and Combustion Engineering

CC: Jacqueline Campbell, CPSC Voluntary Standards Coordinator
Thomas O'Toole, ASTM F14 Staff Manager, ASTM International