



United States
Consumer Product Safety Commission

July 6, 2026

TRANSMITTED VIA EMAIL

Zoran Madzar
Chair of ASTM F15.60 Subcommittee for Portable Pools
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Justin Wiley
Vice President
Government Relations, Standards, and Codes
Pool & Hot Tub Alliance
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Alexandria, VA 22314
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RE: Commission Determination Granting Petition CP 25-2 (Petition Requesting a Mandatory Regulation for Child-Resistant Above-Ground and Portable Pool Ladders) and Directing Further Standards Development¹

Dear Mr. Madzar and Mr. Wiley:

On June 3, 2026, the Commission granted petition CP 25-2, consistent with CPSC staff's analysis² and directed the staff to continue to work with ASTM F15.60 and, following the formation of a task group, to engage with the ANSI/PHTA Hot Tub Alliance (PHTA) to develop:

1. Performance requirements for child-resistant ladders intended for use with aboveground and portable pools;
2. A measurable and objective definition of child resistance; and
3. Enhanced warning and instructional requirements intended to incentivize consumers to engage child-resistant ladders.

Staff will also work with the task group to evaluate the hazard data, identify unresolved technical and policy issues, and develop consensus recommendations to support relevant standards development.

¹ This letter was prepared by CPSC staff. It has not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

² Staff Briefing Package - Petition CP 25-2, available at <https://www.cpsc.gov/s3fs-public/Staff-Briefing-Package-Petition-CP-25-2.pdf?VersionId=7om1QcWiePXCbtbBwaBa4esHsBlzY0Op>; Record of Commission Action, available at <https://www.cpsc.gov/s3fs-public/RCA-Petition-CP-25-2-Requirement-for-Child-Resistant-Ladders-for-Portable-and-Above-Ground-Pools.pdf?VersionId=RyT2y09WsRNa9sxfA0.kihD0zJn9oHjA>.



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The Commission has directed staff to provide a status update within 12 months from the date the petition was granted on whether sufficient progress has been made toward developing adequate voluntary standards. Staff will consider publication, ballot, or readiness for ballot as the criteria for determining whether adequate progress is being made. If the Commission determines that insufficient progress has been made, the Commission stated that staff should initiate preparation of a notice of proposed rulemaking for child-resistant ladders for aboveground and portable pools for Commission consideration.

CPSC staff appreciates the ASTM F15.60 subcommittee's efforts to address hazards associated with portable pools and the plan for a July 14, 2026, meeting to work through the outstanding issues so the standard can be completed on schedule with strengthened performance and labeling requirements.

CPSC staff urges PHTA to form a task group as quickly as possible to develop consensus recommendations to support standards development.

Staff looks forward to continuing to work with the F15.60 subcommittee as well as PHTA in forming a task group to ensure that the hazards associated with aboveground and portable pools are reduced or eliminated.

If you have any questions, or need additional information, you may contact me at: swhite@cpsc.gov or (301) 987-2562.

Sincerely,

Sharon R. White

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Directorate for Engineering Sciences

cc: Molly Lynyak, Director, Standards Development and F15 Technical Committee Operations
Don Mays, Chair, Committee F15 Consumer Products
Jacqueline Campbell, CPSC Voluntary Standards Coordinator
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