

September 18, 2025

TRANSMITTED VIA BALLOT COMMENT

Zoran Madzar, Chair of ASTM F15.60 Subcommittee for Portable Pools
100 Barr Harbor Drive
West Conshohocken, PA 19428-2959

Dear Mr. Madzar:

U.S. Consumer Product Safety Commission (CPSC) staff¹ appreciates the opportunity to provide comments on the ASTM Ballot F15 (25-16), Item 5, Revision of F2666-16 (2024) *Standard Specification for Aboveground Portable Pools for Residential Use*, WK93447.

Staff supports this pool ladder safety effort in the ASTM F15.60 subcommittee and recognizes this ballot as an initial step toward enhanced safety of child-resistant ladders in all above-ground pools. The proposed new requirements include child-resistant features with age-based measurements for children up to five years old, as well as requirements for dual action or equivalent action locking mechanisms. Lastly, new labeling and instructions highlight safety information for the consumer such as the ladder design, the importance of supervision of children in pool safety, and the benefit of layering with other pool water safety barriers. Staff support these requirements, and the accompanying test methodology. According to the May 2025 CPSC publication on Pool or Spa Submersion: Estimated Nonfatal Drowning Injuries and Reported Drownings,² there was an average of 281 reported drowning deaths associated with pools and spas in children younger than 5 years old from 2020-2022. Twenty-five percent, or approximately 71 of these deaths, on average, occurred in all types of above-ground pools with most reported access points identified as the ladder. Staff recognize the ASTM F15.60 ballot may eliminate the removable lightweight and non-child-resistant ladders, which is thought to be the prevalent ladder type in consumer use and most frequently used by toddlers to gain access to the above-ground-pool water. Staff view these new ASTM F15.60 child-resistant and locking mechanism ladder requirements with removal of the lightweight non-child-resistant ladders as an approach that may save children's lives.

Staff also acknowledge two other issues relevant to development of the standard. These are the horizontal pool strap design on the outer wall of the pool and the warning labels on the pool ladder. During ASTM F15.60 subcommittee meetings, there were discussions about the safety design of the external reinforcing strap and the potential for these straps to inadvertently assist toddlers in accessing the water. Staff

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

² https://www.cpsc.gov/s3fs-public/Pool-or-Spa-Submersion-Estimated-Nonfatal-Drowning-Injuries-and-Reported-Drownings-2025-Report.pdf?VersionId=EaannN_hQd1lQdE4AoAq2eyX.7YYRnpm

recognize that portable pools can have a pool wall height below 48 inches and that the highest point of the pool wall may have a grasp height within reach of children. The ASTM F15.60 subcommittee approach to the horizontal strap safety is to further discuss footholds and/or handholds through a working group, which will initiate after the ASTM Ballot F15 (25-16). Staff look forward to continuing these discussions. Staff also look forward to developing strong warnings for consumers.

Staff acknowledge the importance of working to improve the safety of residential pools to safeguard toddler lives.

Sincerely,

Susan Bathalon
Children's Hazards Program Area Risk Manager
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cc: Molly Lynyak, ASTM F15 Staff Manager
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