



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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TRANSMITTED VIA EMAIL

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

Re: ASTM Ballot F15 (20-10), Item 1, 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 1 from ASTM F15 (20-10) ballot on ASTM F1487-17 *Standard Consumer Safety Performance Specification for Playground Equipment for Public Use*. I am voting negative on this ballot item because this ballot, as worded, would allow unsafe products to be included in the scope of F1487. Staff is concerned that the proposed ballot would allow glider products to comply with the standard that are similar in design to a previously recalled glider (*see* CPSC's recall 12-109).

CPSC staff is aware of multiple incidents related to these glider products. In 2012, CPSC issued recall 12-109 for a playground glider after CPSC and the firm received 16 reports of injuries to children, including 14 fractures to arms and legs, one fractured collar bone, and one bruised spleen.² CPSC recalled the glider due to a fall hazard presented by a product with no transition platform at the top, and no sides to the chute (*see* Figure 1). Gliders with a solid concave surface suggest that a child is likely to rest their rear end in the concave portion of the glider, and younger users (*e.g.*, those 5-6-years old or younger) are the most likely to attempt to ride the glider as they would a traditional slide, with their feet first, rather than over the glider. Based on these incidents, CPSC 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 falls.

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 <https://www.cpsc.gov/Recalls/2012/childrens-slides-recalled-by-landscape-structures-due-to-fall-hazard>.



Figure 1. Recalled Playground Glider

In a meeting on May 15, 2020, the subcommittee reviewed ballot F15 (20-06) and found a voting member's negative vote non-persuasive (item #6). In his negative, this voter expressed concern that some of the example gliders shown in the pictures that accompanied item 1 of ballot F15 (20-03) appeared similar to slides, affording a feet-first sliding position, and therefore, the gliders should have a support rail and comply with the slide requirements. According to the ASTM closing report, part of the rationale for the non-persuasive finding was based on the subcommittee's belief that photos of the example gliders in item 1 did not have turns as sharp as the recalled product, and were banked in such a way as to aid in balance and prevent lateral discharge.

However, neither the standard, nor the revised ballot proposal contains performance requirements that specify the sharpness of a turn or banking of the product to aid in balance and prevention of lateral discharge. In fact, the standard contains no references to "sharp turns and banking," yet the subcommittee based their non-persuasive rationale on these two design concepts. The only related reference in ballot item # 1 from F15 (20-10) was the statement, **"8.16.6 The gliding portion of banister rails/gliders shall be continuous, with no protruding welds, joints, or abrupt changes in direction."** The phrase "Abrupt changes" is not defined, and therefore, is subjective. Without specific requirements for allowable turns and banking, nothing in the standard or the ballot proposal prevents the sale of a glider with sharp turns and no banking (similar to the recalled unit).

Staff also questions why the subcommittee chose to focus on "sharp turns and banking," because, in the opinion of CPSC technical staff, the recalled unit did not have "sharp turns," although there was some banking. However, undefined banking at turns may not be sufficient to prevent lateral discharge, which is why the COMSIS report recommended sides on sliding boards. Although the non-persuasive rationale cites the COMSIS report on banister slides, gliders are

inherently different from bannister rails in that they have a solid surface that, if flat or concave, affords a feet-first sliding position. CPSC staff opines that warning labels or age labeling are an insufficient method of instructing *children* on the use of a product on a playground. Playgrounds are designed for children to explore and be challenged, and it is unrealistic to believe that a “proper use” diagram will persuade children, or that a “5+” age label would discourage a younger child.

I am submitting a negative vote and requesting that this ballot be withdrawn while the ASTM subcommittee jointly examines the hazard patterns about which CPSC staff has consistently expressed concerns. CPSC staff concludes that gliders compliant with the proposed ballot are inherently hazardous, and that such gliders should meet the slide requirements of ASTM F1487 to reduce the likelihood of lateral discharge and subsequent falls.

Sincerely,
Kevin K. Lee
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CC: Patricia L. Edwards, CPSC Voluntary Standards Coordinator
Molly Lynyak, ASTM International