



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

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Mr. James Olshefsky
ASTM F08 Staff Manager
ASTM International
100 Barr Harbor Drive
West Conshohocken, PA, 19428-2959
Re: Letter Ballot F08.16 (03-01) Item 1

Dear Mr. Olshefsky:

This is my abstaining vote with comments for the F08.16 (03-01) Item 1 letter ballot on "Treestand Fall Arrest System." The U.S. Consumer Product Safety Commission (CPSC) staff is prohibited by CPSC policy from casting affirmative or negative votes on issues related to voluntary standards.

CPSC staff recommends that the standard provide specifications to ensure that a user can safely escape from a fall arrest system (FAS) after falling from a tree stand. In a recent incident involving a death by asphyxiation (see enclosed investigation report 021212CNE7628), a hunter fell and was suspended by his full body harness. The hunter attempted to escape by removing the harness, which resulted in a harness strap compressing the hunter's neck and asphyxiating him. Many hunters hunt alone in secluded areas and would most likely be required to rescue themselves if suspended by a FAS. Staff is aware of seven deaths that involved a person being asphyxiated by a safety belt, chest harness, or full body harness (see-enclosed investigation and incident reports). CPSC staff recommends the formation of a task group to address this issue; CPSC staff would like to participate on this task group.

CPSC staff also notes that the title of the proposed standard is "Standard Test Method for Treestand Fall Arrest System." Since section 11 of the proposed standard provides pass/fail criteria, it seems appropriate that the title identify the standard as a test method and specification and that the scope section should also identify that the standard includes requirements.

These staff comments have not been reviewed or approved by the Commission. If you have any questions or comments please feel free to contact me at the above numbers.

Sincerely

A handwritten signature in black ink, appearing to read "DeWane Ray", with a long horizontal flourish extending to the right. The signature is positioned above a vertical line that runs down the right side of the page.

DeWane Ray, P.E.
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Enclosures