

**U.S. Consumer Product Safety Commission
LOG OF MEETING**

OFFICE OF
THE SECRETARY

2002 NOV 25 P 2:17

SUBJECT: ANSI Z315.1-1996 Tricycle Standard

DATE OF MEETING: 10/22/02

LOG ENTRY SOURCE: Vince Amodeo

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LOCATION: Toy Industry Association, NYC

CPSC ATTENDEE(S): Vince Amodeo

NON-CPSC ATTENDEE(S):

Ms. Joan Lawrence, Toy Industry Association, Chair of the Canvass Group

Ms. Elaine Besson, EHB Consulting

Ms. Lorena Crispino, Toy Industry Association

Mr. Charles Fischer, Hasbro, Inc.

Mr. Claudio Gattozzi, The Little Tikes Company

Mr. Greg Keeton, Kettler International, Inc.

Mr. Alan Korn, National SAFE KIDS Campaign

Aaron Locker, Esq., Locker, Greenberg & Brainin

Mr. Paul Pasin, Radio Flyer, Inc.

Ms. Kitty Pilarz, Fisher-Price, Inc.

Mr. John Preston, John Preston Consulting

Ms. Judith Ray, West Chester University (via Telephone)

Mr. Rick Rosati, MTL – ACTS

Ms. Linda Root, STR

Mr. Piyush Shah, SGS

Mr. Joel Taft, Fisher-Price, Inc.

Mr. Greg Walker, Toys "R" US

126-02
AB
 No Mfrs/PrvtLbtrs by
Products Identified
Exempted by

SUMMARY OF MEETING: The canvass committee for the five year review of the ANSI Z315.1 Tricycle Standard met to discuss the unresolved proposed changes to the standard and address any open issues. The discussion proceeded through the four established working group proposals for New Requirements, Anthropometric Data, Test Methods and Labeling. Details of the meeting are attached.

**MINUTES OF THE MEETING
OF THE CANVASS GROUP TO REVISE ANSI Z315.1-1996, Safety Requirement for
Tricycles**

TPS / OFFICE OF
THE SECRETARY
2002 NOV 25 P 2:17

Held October 22, 2002

Present:

**Ms. Joan Lawrence, Toy Industry Association, Chair of the Canvass Group
Mr. Vincent J. Amodeo, US Consumer Product Safety Commission
Ms. Elaine Besson, EHB Consulting
Ms. Lorena Crispino, Toy Industry Association
Mr. Charles Fischer, Hasbro, Inc.
Mr. Claudio Gattozzi, The Little Tikes Company
Mr. Greg Keeton, Kettler International, Inc.
Mr. Alan Korn, National SAFE KIDS Campaign
Aaron Locker, Esq., Locker, Greenberg & Brainin
Mr. Paul Pasin, Radio Flyer, Inc.
Ms. Kitty Pilarz, Fisher-Price, Inc.
Mr. John Preston, John Preston Consulting
Ms. Judith Ray, West Chester University (via Telephone)
Mr. Rick Rosati, MTL – ACTS
Ms. Linda Root, STR
Mr. Piyush Shah, SGS
Mr. Joel Taft, Fisher-Price, Inc.
Mr. Greg Walker, Toys “R” US**

Absent:

**Mr. David Bergman, Processed Plastics Co.
Mr. Ludgar Busche, Kettler International, Inc.
Ms. Nancy Cowles, Kids in Danger
Mr. Paul Doppelt, PD Consultant
Mr. Bob Hadley, Razor USA
Mr. Tim Harris, Peg Perego USA, Inc.
Mr. David Hommel, Child Craft Industries Corp.
Mr. Owen Jones, JC Penney
Mr. David Kehrli, ETC Laboratories
Jonathan Midgett, Ph.D, US Consumer Product Safety Commission
Mr. Robert Pasin, Radio Flyer, Inc.
Ms. Frances Wallach, Total Recreation Mgmt.**

Opening

Introductions (Roll Call)

The meeting was called to order at 10:00 am by Joan Lawrence. She recommended a change to the order of discussion topics on the agenda. At the request of two members of the Anthropometric Work Group (WG) who would be arriving late, the discussion of Anthropometry would now follow the New Requirements Work Group. She asked each Work Group (WG) Chair to present an overview of the progress of their respective WG and any proposed changes. She encouraged canvass members to take the opportunity to comment and pose questions on each respective report and draft.

New Requirements Work Group

Joel Taft, chair of the New Requirements Work Group (WG), briefed the canvass on his WG's discussion in response to the issues raised. Those comments that drew notable discussion are described below:

Comment 20:

WG suggested that comment 20, which recommends that Sections 4.4.3.1 and 4.4.3.2 on protrusions be combined by the Editorial WG. Elaine Besson, Editorial WG Chair, did not agree and suggested leaving the definition, as is, for clarity. It was agreed that no change would be proposed.

Comment 22:

NEISS data reported no injuries related to spoked wheels. No domestic data was found which would present a danger against spoke wheels. Joan Lawrence submitted a request to the Toy Industry Europe (TIE) for any tricycle incident data from Europe that would support the European requirement that does not allow wheels to contain openings ---greater than 6mm. She has not yet received a response and will follow-up with TIE after the meeting. Greg Keeton also volunteered to contact committee members who worked on this section of EN-71. It was decided this item would be held until additional information from Europe is available.

Comment 40:

Claudio Gattozzi suggested that portion of the bicycle standard referenced should be written in its entirety. Joel Taft explained because standards are frequently revised it is customary to only to name them. Greg Keeton noted that there are many different types of tricycle seats, and the existing seat retention system referenced in the bicycle standard may not apply. It was recommended that the WG revisit the bicycle standard to assess whether it still applies, and if so, would leave as is. If the bicycle standard does not apply, WG may need to develop it own test method.

Comment 61:

WG recommended adding a definition for free-wheeling tricycle. The proposed definition included the statement that pedals must be able to be used as a brake in the back position. It was discussed whether a 36-month-old child would have the ability to understand the concept of a brake or would be most likely put their feet to the ground to stop the tricycle, for this age a brake could give parents a false sense of security. It was noted that the current European standard has a definition and test method for free-wheeling that requires a braking system. It was suggested that before we consider adding a brake we would first need to assess children's ability to use a foot brake. Vince Amodeo volunteered to consult with the CPSC Human Factors group for data on back peddling for braking. It was agreed that a new task group be formed to look further into the free-wheeling tricycle issue. Greg Keeton, Paul Pasin and Rick Rosati volunteered to be on this task group; other canvass members were invited to volunteer and can do so by sending an e-mail to Joan Lawrence.

Additional requirements for tricycle accessories (horns, bells) were also suggested by the WG. It was agreed that specific features and sections would be referenced in F963. Greg Keeton volunteered to make a list of accessories that would be reference in F963, to be used as a starting point.

WG chair also mentioned that Dave Dart and Dave Dick from MTL-ACTS are currently developing requirements for push handles, rear baskets, multiple occupants and rear steps. These requirements will be presented at the next meeting.

Comment 63:

WG recommended revising a requirement for "Circular Holes in Rigid Materials". A diameter measurement of 0.265 in (7mm) was proposed. (This differs from the F963 measurement of 0.250 in.). Joel Taft stated that according to the Consumer Safety Unit's "Hand Book of Child Measurements and Capabilities", the little finger of a child 12-24 months is 0.275 in (0.7 cm) in diameter. The proposed diameter limit of 0.265 in. would not cause a potential disadvantage and be protective of the youngest tricycle user. It was agreed that the proposed change be considered and that a rationale be developed and included when balloted.

Comment 64:

WG recommended a test method to address wheel retention; the proposed wording was based on ISO 8098 "Safety Requirement for Bicycles for Young Children". For clarity, it was requested that the proposed wording to this section be rewritten. WG agreed to revise language and distribute proposed changes in sufficient time to allow review and testing.

Anthropometric Data Work Group

John Preston, chair of the Anthropometric Work Group (WG), gave a presentation to explain their work in this area and the proposed draft. After discussion, those comments that drew notable discussion are described below:

The WG proposed a revision to Table 1. The proposed table would list the child's age, 95th percentile for weight and crotch height. It was agreed that the child's age would not exceed the age of 8 years. It was suggested that the C' dimension be removed.

Due to the adjustable seats on tricycles and the many length variables, it is not necessary. It was agreed to remove the C' dimension. John Preston will revise the table, and will include a footnote to the referenced data (1975 University of Michigan Study).

Test Methods Work Group

Kitty Pilarz, chair of the New Test Methods Work Group (WG), gave a presentation to explain their work in this area and the proposed draft. A summary of the discussion follows:

Dynamic Stability Testing:

The WG suggested adding a Dynamic Stability Testing (a rolling test). The canvass agreed the dynamic test was not necessary and would be difficult to test. It was decided the dynamic stability testing would not be proposed.

Static Stability Test:

WG proposed a Static Stability Test, using a constant tilt angle of 15° (vs. the variable θ in current standard). This change was based on the tests for sideways stability and fore and aft stability written in F963. It was argued that this proposal would be more stringent than the European standard EN-71, (which uses a 10° tilt angle) and is biased against tricycles of a shorter length such as traditional tricycles. It was agreed that this section will be looked at further by the entire canvass and will be discuss at a future meeting.

Comment 33 & 39:

WG recommended that products that have removable or adjustable seat posts would be addressed separately. Since these posts need to be inserted to a certain point, it was suggested that a permanent mark or ring be included to indicate the minimum insertion depth. It was also suggested that instructions for the consumer indicated this. Kitty Pilarz, Elaine Besson and Chuck Fischer will draft the generic wording for the instructions on insertion mark.

New Comment:

The WG suggested that the testing order be changed and listed as follows: roll stability, forward stability, rearward stability and drop test. A tricycle is most

likely to receive damages during the drop test therefore; it was recommended that this test be listed last. The canvass group agreed to the proposed change.

Warning/Labeling Work Group

Charles Fischer, chair of the Warning /Labeling Work Group (WG), gave a presentation to explain their work in this area and the proposed draft. A summary of the discussion follows:

Elaine Besson recommended that section 7.1 harmonize with the labeling section in ASTM F963 on Battery Powered Ride-On Toys (BPRO). There was a concern about the differences between tricycles and BPROs. An example was given which pointed out that a tricycle, unlike BPRO are not recommended for riding in certain areas such as on hills. In order to allow some flexibility, it was agreed that the words "minimum requirement" be eliminated. It was explained that a manufacturer could customize warning wording to meet the specific need of their product.

Elaine Besson proposed the WG include a definition for the word "permanent". She suggested the WG look at the definition used in the Juvenile Product Manufacturing Association (JPMA) Standard. Alan Korn also recommended maybe using the car seat permanence wording from the National Highway Traffic Safety Administration (NHTSA) Standard and would provide the WG with the information. It was agreed to include a definition, the WG will research and develop a definition.

The WG proposed that helmet information should be under the section for instructions. It was discussed whether it should also be listed under the warnings section. Alan Korn noted that the CPSC incident data from 1997 to 2001 reported 1,700 head injuries and 1,900 facial incidents associated with tricycles. He also indicated that several states have laws that require a child to wear a helmet worn while riding tricycles. Kitty Pilarz supported having the helmet information listed under the instruction section, but disagreed with including the information in warnings section. She has consulted with experts who would not require a child to wear a helmet, because a tricycle is low to the ground and is not likely ridden faster than adult walking speed. The Canvass agreed to have helmet information listed under the instruction section only.

It was suggested by the WG that the statement "always wear shoes" be moved instructions section. The Canvass strongly opposed, and recommended that the statement not be moved and remain in the warnings section. WG agreed to leave statement as is.

Other Business:

John Preston proposed that WG use both the English and metric units of measurement. In efforts to keep the standard consistent throughout, the Canvass agreed to use the format: English unit (Metric unit).

Next Steps:

It was agreed that each Work Group would be given approximately 30 days to submit their proposed draft with the changes discussed from this meeting (Nov. 22). Once the proposed drafts are received they will then be distributed to the full Canvass to allow sufficient time for testing and review (approximately 30 days after receipt).

The next meeting of the full Canvass Group will be held on Wednesday, January 22 at 10 a.m. at the office of Toy Industry Association, (TIA) in New York City. Work Groups should be prepared to present their work to the entire canvass.

Closing:

The meeting was adjourned at 2:45 p.m.

**Lorena Crispino
Lorena Crispino
Canvass Secretary**