



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

May XX, 2013

Mr. Ken Kutska
ASTM F15.29 Subcommittee Chairman
100 Barr Harbor Drive
PO Box C700
W. Conshohocken, PA 19428-2959

Dear Mr. Kutska:

The staff of the U. S. Consumer Product Safety Commission (CPSC, Commission)¹ is writing as a follow-up to the May 10, 2012 comment on F15.29 (12-03) ballot item 6. In that letter, staff noted that the specific types of playground equipment in section 8 of the standard (balance beams, climbers, upper body equipment, sliding poles, slides, swings, swinging gates, merry-go-rounds/whirls, roller slides, seesaws, spring rockers, log rolls, track rides, roofs, and stepping forms) did not appear in the definition section of the standard. Although we recognize that it has been difficult to define these items, staff feels that the lack of definition may lead to differences in interpretations of the standard, resulting in some products not meeting the appropriate performance requirements.

Over the past few years, the design of playground equipment has undergone some radical innovations. In general, provided that safety standards are met, CPSC staff is in favor of innovations in playgrounds and believes that playgrounds serve an important function in childhood development. That is, playgrounds should allow children to develop physical and social skills, and part of that development includes testing the limits of their skills. Innovation is important for this, as children need new challenges. Staff believes it is important that new, innovative playground components should still follow the safety recommendations and standards that both CPSC staff and ASTM have worked to refine over the past several decades.

In particular, CPSC staff has become increasingly concerned with new innovations that are labeled as "climbers" but are likely to be used as slides. Currently, it would be difficult to produce injury statistics specifically pertaining to slides labeled as climbers because these are new designs and generally listed under the NEISS code for slides. Therefore, it would be difficult to differentiate data for these products from traditional slides. However, anecdotally, staff is aware of incidents described as involving slides (such as "slid off side of slide," "fell off slide while sliding down"), yet further research revealed that the incident product was called or tested as a "climber."

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.

Staff recognizes that neither the ASTM playground-related standards (F1148-12, F1487-11, F1918-12, and F2373-11) nor the current version of the CPSC *Public Playground Safety Handbook (Handbook)* define a “slide”; however, lack of a definition should not mean that the equipment is required to meet performance standards based on names given to the product rather than the product’s function. Historically, the 1986 printing of the CPSC’s *A Handbook for Public Playground Safety*, volume II, defined a “slide” as an “apparatus having an inclined surface used for sliding.” The working definition that CPSC members of the technical staff are currently using is that a slide is a flat or concave, inclined surface where children are likely to sit on their buttocks and slide down with their feet in front of them.

Staff asks that the subcommittee recognize that the recommendations in the *Handbook* and the requirements in the standard are designed with respect to the hazards posed by the type of equipment. Staff recommends that the subcommittee develop definitions for the equipment types listed in Section 8 based on the likely use patterns of children. Definitions based on likely use patterns, rather than strictly design-based definitions, will foster continued innovation in playground design and help ensure that such innovations meet the appropriate safety requirements.

Sincerely,

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cc:

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