



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
5 Research Place, Rockville MD 20850

July 13, 2020

TRANSMITTED VIA EMAIL

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

Re: ASTM Ballot F15 (20-06), Item 12, Ballot Item for Banister Rails/Gliders; F1487-17  
*Standard Consumer Safety Performance Specification for Playground Equipment for Public Use*

Dear Mr. Kutska:

As the Voluntary Standards Coordinator at CPSC, I am writing to discuss staff's<sup>1</sup> concern regarding ballot Item 12 from ASTM F15 (20-06) ballot. Issued on June 1, 2020, this ballot closes on July 13, 2020. When reviewing the ballot, item 12 appears to contain a minor revision to section 6.12 "Banister Rails/Gliders" from F1487 *Standard Consumer Safety Performance Specification for Playground Equipment for Public Use*. Yet the current version of the standard, ASTM F1487-17, does not contain a section 6.12, nor does it contain any section on banister rails/gliders. Therefore, staff questions why ASTM is issuing a ballot item to revise it.

A previous ballot, F15 (20-03), issued on March 30, 2020, contained an item which, if approved, would add new definitions and many requirements for banister rails/glider products, a new product category to the standard. There were several negative votes on the March 30 ballot item; and although many were either withdrawn, or found to be non-persuasive during the last F15.29 subcommittee meeting, those non-persuasive negative votes, as of yet, have not been resolved.

The current ballot, F15 (20-06), contains five items to resolve the non-persuasive negative votes; and as mentioned, it also contains a revision to section 6.12, which does not exist yet, because it has not been approved by ASTM. Until the current ballot closes, and the negatives from the previous ballot are all resolved and approved by ASTM's Committee on Standards, the negatives remain unresolved, and therefore, the original ballot item has not been approved.

I have been informed that simultaneously balloting these ballot items, while highly unusual, is

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<sup>1</sup> 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.

not prohibited under ASTM procedures. Although technically it is not prohibited, one can see how it can cause confusion to the members of F15, who may not appreciate fully what they are voting on. Therefore, CPSC staff is requesting that ballot item 12 be withdrawn until the language being revised is in an approved and published standard.

CPSC staff is also concerned about the technical merits of the ballot item itself, and those concerns are addressed in a separate letter from Kevin Lee, CPSC's expert on playground systems.

Sincerely,

Patricia Edwards  
Voluntary Standards Coordinator

CC: Kevin Lee, Mechanical Engineer, CPSC  
Molly Lynyak, ASTM International