

30 JUNE 1997

Mr. John D. Preston, P.E.  
Directorate for Engineering Sciences  
U.S. Consumer Product Safety Commission  
4340 East West Highway, Suite 611  
Bethesda, Md. 20814-4408

Mr. Preston:

I'm writing in regards to some proposed changes to the CPSC Handbook for Public Playground Safety.

I believe with all my heart that we should do everything in our power to create safe facilities for our children to play and grow. I also think we have to create safe challenges for our young people to play under.

If we limit heights of play structures to 8' we will take away a large portion of the potential play value of the structure.

Neither the ASTM F1487 nor the ASTM F1292 standard limits heights of play equipment. CPSC should accept the work of these groups and harmonize its Handbook's contents with ASTM.

There is protective surfacing material available for heights in excess of 12' that meet the CPSC's own cushioning requirements. It is not necessary to arbitrarily limit heights.

Elementary physical education teachers tell us that the weakest part of the elementary age youngster is their upper body strength. To lower the heights of the overhead climbers would take away a great teaching tool for developing this upper body strength.

In order to start the user properly on the overhead activity there needs to be an entrance and exit area. The end climber with rungs allows the user to get to the activity in the proper position to start and finish the activity.

Climbing ropes are another good upper body builder. ASTM F1487 currently requires that the ropes be anchored both on top and bottom ends. ASTM has a revision in progress that would require that no loop could be formed which would be large enough to allow it to be wrapped around a child's neck. It would make sense that CPSC adopt the same requirement.

I understand that under the stability section footings may be required to be inspected by a building code official. In my experience with the code people it seems they have such a work load that I'm afraid they would not put a high priority on playground equipment. I feel we would be served best by having the contractors and professional installers responsible for inspection.

Thank you for your consideration in these matters.

Sincerely;

*Gary Fain*

Miracle Equipment Co. of Oklahoma

DONNA MASTERSON  
2660 CHATHAM COURT  
GENEVA, IL 60134  
630.232.8902

June 27, 1997

John D. Preston, P.E.  
Directorate for Engineering Sciences  
U.S. Consumer Product Safety Commission  
4330 East West Highway, Suite 611  
Bethesda, MD 20814-4408

Mr. Preston:

I have recently been informed of the proposed changes for the CPSC guidelines for Public Playground Safety. We are trying to entertain our children with exciting play equipment so they can enjoy interaction, play in parks and playgrounds, and keep them entertained while promoting physical activity. Your organization has done some wonderful services for the public, but please do not go so far as to destroy the interest and fun for the any children beyond toddler age in playing on playground equipment in the park.

With slides limited to eight feet, lowering horizontal ladders and eliminating climbing ropes you further discourage children to play on this equipment. We are creating a generation of children who are lacking physical fitness, due to lack of activity, and a great deal of it has to do with so much of the thrill and interest in their activities being taken away. I do not want to see any children hurt, I also do not want to see a generation of obese, inactive children who do not know how to "shimmy" up a rope, use upper body strength to get across horizontal ladders (because all they have to do is stand up and they touch the ground) or have no interest in climbing up to go down a "sissy" 8' slide. We are over regulating, over protecting, and under stimulating our children.

Please stay with the ASTM guidelines already established. They seem to stay within the area between protection against injury and ruining any value and interest in play equipment. I have been working on a school project for a new playground. Compared to our equipment 20 years ago, CPSC have made some intelligent and needed changes. Please do not give us too much of a good thing.

Sincerely,



Donna Masterson

June 27, 1997

Chesapeake Bay Construction Company  
500 Belem Dr.  
Chesapeake, VA 23320  
Doug Diehl, President

Directorate for Engineering Sciences  
U.S. Consumer Product Safety Commission  
4330 East West Highway, Suite 611  
Bethesda, MD 20814

Mr. John D. Preston,

As president of the Chesapeake Bay Construction Company and a playground installer for almost seven years I wish to comment on some of the proposed revisions for the C.P.S.C. Handbook for Public Playground Safety. I have worked with a number of different playground equipment manufacturers and I feel that I have more than a passing interest in the safety of the youth that play on and constantly use the equipment. I believe though, that many of the revisions that you propose will actually reduce the play value of the equipment. I also feel that some of the revisions are unnecessary and will actually hamper the installation process.

In the proposed Section 4.3.1, pertaining to height limitations for school age children, the eight foot height limit is unessential. Neither the ASTM F1487 nor the ASTM F1292 standards limit the heights of playground equipment; why should the C.P.S.C. guidelines? Protective surfacing materials are available for heights in excess of twelve feet that meet the C.P.S.C.'s own cushioning requirements, therefore, these proposed guidelines are not only unessential but also redundant. For years there have been items, such as slides, that are taller than the draft recommendations, these have yielded many opportunities for injuries if there truly was an associated hazard. The height limit is needless and reduces the fun and challenging aspects of playgrounds.

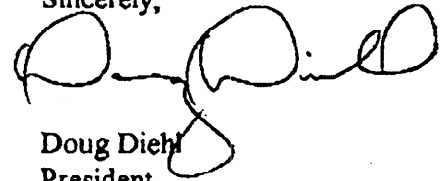
The proposed changes for horizontal ladders and overhead rings in Section 12.1.5 should not lower the height or eliminate rungs for take-off and landing purposes. If the horizontal ladders are lowered from 84" to 78", as proposed, the 4<sup>th</sup>, 5<sup>th</sup>, and 6<sup>th</sup> graders who use them most often, will be dragging their feet. The elimination of rungs used for take-off and landing on horizontal ladders and overhead rings will make it all but impossible for use by smaller children. What is the use of even keeping the equipment if only the largest of the children can use it?

The C.P.S.C. should adopt the ASTM F1487 standards concerning climbing ropes as to avoid their complete elimination as proposed in the revisions for Section 12.1.7. ASTM F1487 standards require a climbing rope to be secured on both ends and are in the process of revising the standard to also read that no loop could be formed that would be large enough to fit around a child's head.

The proposed revisions for Section 7.1.1 concerning stability should eliminate the requirement that footings be inspected by a qualified inspector. Most localities do not have this requirement and therefore do not have the qualified personnel. This process, as a whole, would also slow installation. The C.P.S.C. standards should also eliminate weekend and holiday installs which occur on a regular basis causing unnecessary additions to installation costs.

These proposed revisions will do more harm than good. Some of the height specifications that have been proposed are superfluous and will greatly reduce the number of children that are able to play on the equipment. When considering safety revisions and parameters it is important to keep in mind that playground equipment is designed for children of all different sizes. The revisions proposed concerning installation and inspection are more of a hindrance and nuisance and will most likely be ineffective. I hope you consider this letter and look into the suggested standards of the ASTM F1487 and the ASTM F1292.

Sincerely,

A handwritten signature in black ink, appearing to read "Doug Diehl". The signature is fluid and cursive, with a large loop at the end.

Doug Diehl  
President

# Taylor Associates

403 Aragona Drive, Fort Washington, Maryland 20744

Tel: (301) 567-3888 • (301) 567-3386  
Fax: (301) 567-1325

Mr. John D. Preston, P.E.  
Directorate for Engineering Sciences  
U.S. Consumer Product Safety Commission  
4330 East West Highway Suite 611  
Bethesda, Maryland  
20814-4408

June 24, 1997

Dear Mr. Preston

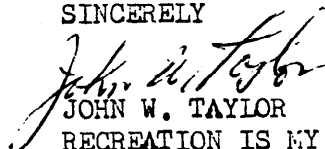
When it was first brought to my attention that your office was soliciting public comments on a few revisions you were planning for the handbook for public Playgrounds Safety; I thought perhaps your office developed something new for construction; I was going to call your office and give my thanks, after reading the revision listed; I had to put my comments in a letter.

I do not know how your office can even think of putting a limit on Heights of Deck system and just say arbitrarily that the small height will result in a safer product. The ASTM manuals, ( These people have run thousands of test), states with the right Safety Surface and at the proper thickness, Height does not matter, With the right safety surface to absorb any fall, there is no or very danger of any child getting hurt. I have been associates with Playground Facilities for over thirty years, I know from my association, Children want and should have a variety of heights based on their age and their abilities to perform; Limiting the height to 8' feet will take away 30 to 40% of the play value.

Your suggestion reducing horizontal ladders and overhead Rings to 78" is not a safety improvement; You might as well tell the 11 and 12 year olds to find something else to do; My Grandson is 12 and 5'10", His body would get nothing but dirty shoes and cloth from dragging on the ground on a unit of 78".

Please", Mr. Preston; If your office has some safety suggestion for the people that manufacture the playground equipment I would back you 100%. I do suggest you leave the height of the equipment to the testing of the ASTM organization; They really do know what they are doing.

SINCERELY



JOHN W. TAYLOR

RECREATION IS MY BUSINESS.

# TAYLOR SPORTS



## & RECREATION, INC.

136 Warm Springs Avenue  
Martinsburg, WV 25401

(800) 286-9693  
(304) 263-7857  
Fax (304) 263-9392

6-28-97

Mr. John D. Preston  
Directorate for Engineering Sciences  
US Consumer Product Safety Commission  
4330 East west Highway Suite 611  
Bethesda, Md. 20814-4408

Dear Mr. Preston,

In regard to some proposed changes in the Handbook for Public Playground safety I would like to offer the following:

Section 4.3.1 Height Limitations for school age children.

It would be extremely detrimental to limit the height of some of play equipment that is available from various manufacturers because it would greatly reduce the excitement and play value of some of the offered components that are out there for kids to use.

As long as there is protective surfacing products available and as long as they are used to provide cushioning for the equipment I do not see the point in this limitation.

Section 12.1.3 Horizontal ladders and overhead rings.

If climbing rungs are eliminated from the equipment only the strongest and largest individuals would be able to use these types of climbers. Why should we discriminate against some of the children who are physically capable of using this equipment?

Section 12.1.7 Climbing ropes

If climbing ropes are designed properly and securely anchored to the ground as recommended by ASTM and they cannot strangle a child then why should this item be eliminated also? I recommend you adopt the ASTM standard.

Sincerely,

A handwritten signature in cursive script that reads "Steven C. Taylor".

Steven C. Taylor

Miracle of Wisconsin  
P.O. Box 143  
Dousman, WI 53118  
1-800-688-6504  
Fax/414-965-5160



Mr. John D Preston. P.E.  
Directorate for Engineering Sciences  
U.S. consumer Product Safety Commissions  
4330 East West Highway, Suite 611  
Bethesda, MD 20814-4408

Dear Sir,

I have recently been made aware of some possible revisions to the CPSC handbook for Public Playground Safety. These revisions concern me a great deal. Not only will these changes hurt my business, but also I foresee that they will lessen the amount of play value that a system has considerably and possibly cause more safety problems in the future. For this reason I felt it important to write this letter to express my reasons for thinking that these revisions are not only unnecessary but in some cases more dangerous than the safety concerns they are meant to take into consideration.

**Section 4,3.1 Limiting Height of Playground Equipment for school age children to eight feet.**

From my experience in the field I feel that this could be a disaster. Since the inception of the ADA we have seen playground equipment losing play value due to the expense of making taller playground systems accessible. This has greatly deleted the play value for school age children. In doing so this situation has created a problem that stems from the play systems not entertaining the kids. When this happens the kids tend to do activities on the system that it was not designed for. This also creates a problem with kids being more destructive in their manner of play.

According to the CPSC handbook a protective surfacing 12" deep meets all the drop fall criteria in excess of 12'. Miracle recommends 12" of safety surfacing under all playground equipment. For this reason I see no reason to limit height to 8'. If a change is necessary it should probably be to require a minimum of 12" of surfacing under all playground equipment.

It would seem far more logical for the CPSC to accept the recommendations of the ASTM on this matter.

**Section 12,1.5 Horizontal Ladder and Overhead Rings.**

To lower these play components to 78" would cause far more problems than it would

solve. At 84" we already have problems with school age children climbing on top of these components from the deck. To lower this 6" inches would just add to the problem. This would also make the climber almost unusable for taller kids.

One of the most frequent complaints we get is from Physical Education teachers who feel that elementary age kids do not get the upper body exercise that they need. To make overhead climbers unusable for these kids would only add to this problem.

This section also contains a change that would eliminate the use of rungs at the end of an overhead climber. Again this would defeat the purpose of the climber by limiting the small kids who have the strength to use it but don't want to have to drop once they get to the other end.

The first change would keep the larger kids from using the climber and the second change to deter the smaller kids. This pretty much makes this type of climber useless on playgrounds. This makes the only possible use for this climber is climbing on top of it which is exactly what we don't want them to do.

#### **Section 12,1.7 Climbing Ropes**

Again the possible revision is defeating the purpose of what is gained by the climber. Not only will the playground lose the play value of such a climber but it will also hurt the development of upper body strength much as the changes in the previously mentioned section would.

ASTM requires that climbing ropes be securely anchored at both ends. It is my understanding that ASTM plans to revise this to require that no loop could be formed in the rope. I feel that this is an adequate safety measure and that CPSC should adopt this as well.

#### **Section 7,1.1 Stability**

I fear that this revision is going to be a nightmare for all involved. I understand that there are manufacturers that may be somewhat lax in their requirements for footings under their playground systems. However having a local building inspector inspect these footing on site will not solve this. Far too many communities do not have an inspector that is qualified to do this. This will also cause undue expense to the end users.

I hope that I have shed some amount of light on the problems that the proposed revisions will cause. It is my feeling that the CPSC should adopt the ASTM's position in most of these areas.

Sincerely



Jen Henbest

District Sales Manager  
Miracle Recreation Equipment Co.



June 25, 1997

Mr. John D. Preston, P.E.  
Directorate for Engineering Sciences  
U.S. Consumer Product Safety Commission  
4330 East West Highway, Suite 611  
Bethesda, MD. 20814-4408

Dear Mr. Preston,

I am writing to you in reference to the proposed revisions to the CPSC Handbook for Public Playground Safety.

**Reference: Deck Heights**

I have some concerns regarding changing the requirements of deck heights. The American Society for Testing Materials has not established height limits for play structures. I am curious as to what research has been done on injuries to support your proposed revisions. In researching this subject, I did not find any data to support your proposed revisions. I am also disturbed that the CPSC is not consulting with ASTM on these issues.

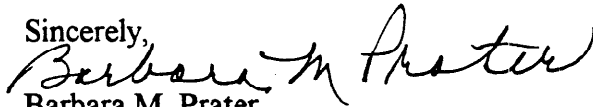
Arbitrarily limiting the heights of play structures for preschool and school age children would be very disappointing and upsetting to educators and parents and most of all, the children you feel you are trying to protect. Children love to climb and investigate and have challenges in play. This is a very important part of their learning process and developing self-confidence. The higher decks and slides should be required to have protective railings and barriers without question. However, if we do not give the children a challenging environment in which to run and climb and play, they may find challenges outside the playground which could be harmful. I would like to think that your research included discussions with parents and educators. They could certainly tell you how quickly children get bored without a challenge in all phases of learning.

**Reference: Horizontal Ladders and Overhead Rings**

Your proposal to arbitrarily lower the height of all horizontal ladders to 78" would eliminate the 4th to 6th graders from using them during play. They would be too low and they would drag their feet. Consequently they would get bored and look for something more challenging. There is that word again. Challenge! And at the same time, you are proposing removing the rungs on either end of the horizontal ladders and overhead rings. Without rungs on at least one end, the smaller children could not reach and therefore would be eliminated from playing on this apparatus.

**Reference: Climbing Rope**

Your proposal to eliminate climbing ropes is illogical. As specified by ASTM requirements, the rope must be securely anchored at both ends. There is also a revision in progress to the ASTM standard regarding rope requirements. I hope you will look into and adopt the ASTM provisions on climbing ropes.

Sincerely,  
  
Barbara M. Prater

June 25, 1997

Mr. John D. Preston, P.E.  
Directorate for Engineering Sciences  
U.S. Consumer Product Safety Commission  
4330 East West Highway, Suite 611  
Bethesda, MD. 20814-4408

**REFERENCE: Proposed Revisions to CPSC Handbook for Public Playground Safety.**

Dear Mr. Preston,

*Subject: Section 4.31 - Preschool Children*

Although I agree with you that most playground equipment should be designed in the three to four foot height range for preschool children, I believe the five foot high decks should be allowed with protective barriers required and slides coming off of them. I find the majority of three to five year old children who have experienced a few hours of playing on equipment with three to four foot heights, get bored and begin using the slides in the wrong way, i.e., climbing up the slides. I believe it is much safer to have slides that are challenging to the children that they will use properly.

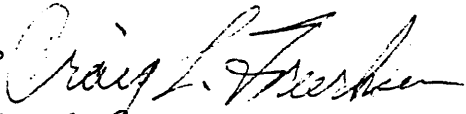
*Subject: Section 4.3.1 - School Age Children*

I basically have the same recommendation for the five to twelve age group. Decks eight feet high or higher need protective barriers and slides. Children need to experience the feeling of height in a safe protected area. I know there are a certain number of children that will climb over the barriers or on the top or outside of a play structure and possible fall and break something. However, these same children are going to climb on something, i.e., garage, light pole, water tower, fire escapes, etc., and could fall and be killed. Let's give the children an environment where they can play, learn and experience challenges in as safe an environment as possible. Children have to be challenged to learn.

*Subject: Section 12.1.7*

I see no reason to eliminate the use of Climbing ropes. I feel they should be attached at both ends and be of a size such as 2 inches in diameter. This size could not easily hang or strangle someone.

I hope you will reconsider the proposed revisions.

Sincerely,   
Craig L. Freerksen

# PIEDMONT PARKS, INC.

P.O. BOX 8307 ♦ GREENSBORO, NC 27419 ♦ PHONE 910-288-0968

FAX 910-288-4707 ♦ TOLL FREE 1-888-288-0968

June 25, 1997

Mr. John Preston, P. E.  
Directorate for Engineering Sciences  
U.S. Consumer Product Safety Commission  
4330 East West Highway, suite 611  
Bethesda, Md. 20814-4408

Ref: Proposed Revisions

Dear Mr. Preston:

With regards to the proposed revisions to the current playground equipment guidelines I wish to make the following comments:

Section 4.3.1 "Height Limitations for school age children". It is my professional opinion not only is this unnecessary it would severely harm the overall play value for many children that safely enjoy play events from heights greater than 8 feet. I feel the increased emphasis by both ASTM and CPSC on adequate surfacing is the correct course to continue.

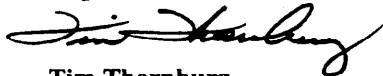
Section 12.1.5: " Horizontal Ladders and Overhead Rings" I feel that lowering these types of components will only limit the age of the user to a select few. The end ladders actually make these pieces accessible to those that need to develop more upper body strength. I am opposed to any further changes in that area.

Section 12.1.7: "Climbing Ropes" I support the change to eliminate strangulation hazards.

Section 7.1.1 "Stability" I strongly feel this is not needed. This would add additional burdens to municipal agencies that are unable and unqualified to do the inspections. Continued emphasis on proper installation documents can educate the end users to help in this area.

I appreciate the opportunity to voice my opinion in these matters.

Regards,



Tim Thornburg

June 27, 1997

Mr. John Preston, P.E.  
Directorate for Engineering Sciences  
U.S. Consumer Product Safety Commission  
4330 East West Highway, Suite 611  
Bethesda, MD 20814-4408

Dear Mr. Preston,

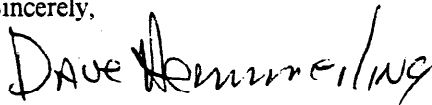
I am writing to express my disagreement on the proposed CPSC 1997 Draft Revision to the "Handbook for Public Playground Safety".

I feel there should be no height limitation for Playground Equipment. As I understand, it says in the ASTM guidelines F1292 that surfacing is required of any height of playground equipment. I also understand that a fall from a 2ft. high piece of playground equipment on to concrete is far more dangerous than a fall from a 12ft piece of equipment on to adequate surfacing. I don't see how lowering the height will reduce playground injuries.

Lowering horizontal ladders from 84 inches to 78 inches is not justified as no injury data indicates that this height is a hazard. Also, eliminating the rungs for take-off and landing on horizontal ladders and overhead rings will make it impossible for anyone but the largest child to use this equipment. There should be at least one rung for take-off.

If you follow the ASTM F1487 guidelines and have the climbing rope anchored at both ends and a propose a revision that requires that the rope does not creat a loop in excess of 5" thus eliminating a strangulation hazard.

Sincerely,



Dave Hemmerling  
536 Farm Rd 2020  
Monett, MO. 65708

June 25, 1997

Debbie Farris  
Rt 1, Box 103  
Purdy, MO. 65734

Mr. John Preston, P.E.  
Directorate for Engineering Sciences  
U.S. Consumer Product Safety Commission  
4330 East West Highway, Suite 611  
Bethesda, MD 20814-4408

Dear Mr. Preston:

I am a mother of four (4) children and I consider myself a good judge on safe developing and exercise play for children. I'm writing this letter because I am concerned about the proposed revisions to the CPSC 1997 Draft Revision "Handbook for Public Playground Safety".

**1. Section 4.3.1 "Height Limitations for School Age Children"**

If you put height limits on playground equipment, this would limit the size of a child that would be able to play on the equipment. If we look at the problem from the ground up and focus on the surfacing and make sure its adequate you don't need a height limit. The ASTM F1487 or the ASTM F1292 does not limits the height of play equipment.

**2. Section 12.1.5 "Horizontal Ladders and Overhead Rings"**


There has been no injury data to indicates that 84 inch height is a hazard. The only thing your going to change if you lower the height to 78 inches, is less children being able to play on the equipment and were talking about a age group from 7-12 years of age who need this developing exercise.

**3. Section 12.1.7. "Climbing Ropes"**

If a climbing rope is anchored at both ends and does not create a loop, there is no threat of strangulation, so why eliminate a very good form of exercise?

Safety should be everyones first concern, so lets make playground equipment a learning, exercise and safe place and not take it away from children. CPSC should conform its handbook standards with ASTM so there would be one set of rules, and not two.

Sincerely,

  
Debbie Farris

**Michael Fonti, P.E.**  
3870 S. Homewood Ave.  
Springfield, MO 65807

---

John Preston  
Directorate for Engineering Sciences  
U.S. Consumer Products Safety Commission  
4330 East West Highway, Suite 611  
Bethesda, MD 20814-4408

Dear Mr. Preston

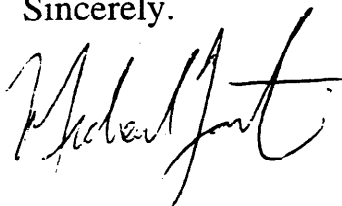
Commenting on the proposed revisions to the Handbook on Public Playground Safety, I strongly oppose to the addition of section 4.3.1 limiting the height of non-enclosed play surfaces. The proposed 8 foot height limitation is an arbitrary limit that is not supported by data of facts. Enforcing this limitation will significantly reduce the play value of the equipment without providing any known safety enhancement.

Impact absorbing material is easily available that meet your CPSC requirements for a 12 foot fall height. Limiting height to a lesser value is unnecessary.

Certified playground equipment manufacturers are supplying equipment at the highest level of safety. Inspectors are ensuring that the equipment remains within safety guidelines, which includes sufficient protective surfacing. Sufficient surfacing for a 12 foot fall height is equally protective as an 8 foot fall onto a similarly protected surface.

Please reconsider the height limitation as proposed in the 1997 draft revision. The addition of this section will not enhance public safety only limit the enjoyment for the users.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Fonti". The signature is stylized and cursive.

Michael Fonti, P.E.

JUNE 24, 1997

Mr. John Preston, P.E.  
Directorate of Engineering Sciences  
U.S. Consumer Product Safety Commission  
4330 East West Highway, Suite 611  
Bethesda, MD 20814-4408

Dear Mr. Preston

We have been looking over the proposed revisions to the CPSC 1997 and would like to express our concern over some of the changes. For the ease of reading we will list them by section and point.

***Section 4.3.1: Height Limitations for School Age Children***

1) There are thousands of slides and other apparatus out on America's playgrounds that are taller than the proposed 8 foot limitation. They have been there for years with no technical data to support the proposed arbitrary height limitation. From a personal insight, in 13 years of working in Emergency Medical Services, I have seen far more injuries using ground equipment than I have from slides and other equipment that were in excess of 8 feet in height.

2) ASTM standards do not limit the height of playground equipment. CPSC should follow the lead of ASTM and incorporate the research that this group has already done in the CPSC Handbook. This will help eliminate a lot of confusion with the general public.

3) Limiting the height of the playground equipment to 8 feet would detract from the play value of the equipment. We have 3 children, ages 16, 12, and 11, every time we have gone someplace that has playground equipment the first place the children go is the fastest, tallest, or most exciting piece of equipment they can find. Perhaps this due to their peers or it could be their parents were the same way when they were children. For the CPSC to arbitrarily set such low heights, takes away from the adventure and excitement of the playground.

4) There is surfacing available that meets CPSC's own requirements for heights in excess of 12 feet. So why arbitrarily limit heights to less than 2/3rd's of what CPSC says the protective surfacing will handle?

We would like to see the height restriction removed from the Draft Proposal.

### ***Section 7.1 Assembly and Installation & 7.1.1 Stability***

These go hand in hand with each other and brings up several questions. Who is going to certify the inspectors? Before bringing in such language as inspectors and inspections of equipment a program of standards and training has to be in place. Who is going to oversee this program much less who is going to pay for the training and credentialing of inspectors. In addition, most localities do not have inspectors enough to look at footings much less installed equipment and still keep up with the regular work load.

We recommend that the verbiage be removed so as not to allow confusion amongst the purchasers and local officials.

### ***Section 10.3.1 Handrail height***

From the Draft text, it appears that by lowering handrails and/or creating separate rail heights for younger age groups will be putting older age groups in jeopardy. Equipment placed in an area that everyone has access to will place people of all ages on that equipment. Shorter handrails will increase the potential for inadvertent falls.

We would like to see the Handbook language retained.

### ***Section 12.1.5 Horizontal Ladders and Overhead Rings***

1) This section eliminates the use of rungs for take-off and landing from horizontal ladders and overhead rings. Without the use of rings to assist in these activities it would be nearly impossible to use the equipment or get any physical benefit from the equipment by the vast majority of children because they would be unable to reach the ladder/rungs. This equipment is important in the development of young upper bodies, teaches coordination, and has been used extensively in retraining of the physically challenged.

2) Decreasing the height of horizontal ladders will make the equipment impossible or at least impractical for most 4th - 6th graders to use effectively.

We suggest that the CPSC should allow at least one rung on the take-off end of a horizontal ladder/overhead rings and maintain a maximum height of 84".

### ***Section 12.1.7 Climbing Ropes***

The CPSC draft wants to eliminate climbing ropes because of the potential for strangulation. This seems a rather extreme measure since ASTM requires that a climbing rope be anchored at both ends and a proposed revision that requires that the rope does not create a loop in excess of 5". With these standards in place there really is no strangulation hazard.



To totally eliminate climbing ropes takes away a basic piece of exercise equipment that builds hand/eye coordination along with arm and upper body strength.

We recommend that the CPSC adopt the current and proposed ASTM standards on climbing ropes.

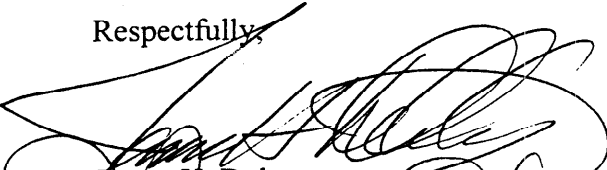
***Section 12.6.2 Single Axis Swings and 12.6.3 Tot Swings***

We do not see the purpose in 3 different heights for the swings. This is only going to add to the confusion of what is correct. If there were some compelling reason for this, then we could understand, unless the 24" height is for those adults too lazy to bend over a little to push to children.

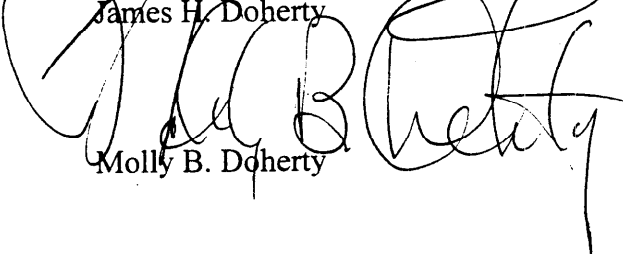
One concern about the 24" height is that the older ambulatory tottler that would use this equipment will find it too high to get into alone or on the other side of that, it becomes a greater fall for that tottler at 24".

As concerned parents we felt it was necessary to bring to your attention the negative impact that the revisions would have to the playground equipment that all of our children uses on a daily basis. We trust that you will consider our comments in your final rule. We appreciate the concern for safety, however, sometimes we get so safety minded that it begins to negate the benefits of adventure, fun, and physical stimuli that is being slowly and unwittingly regulated out of existence.

Respectfully,



James H. Doherty



Molly B. Doherty

Gary W. Clark  
150 Farm Rd. 1090  
Monett, Mo. 65708

Mr. John Preston, P.E.  
Directorate for Engineering Sciences  
U.S. Consumer Product Safety Commission  
4330 East West Highway, Suite 611  
Bethesda, Md. 20814 4408

Dear Mr. Preston:

I am writing in regards to the proposed revisions to the "Handbook for Public Playground Safety". It is my understanding that the CPSC proposes to change Sections 4.3.1, 12.1.5, and 12.1.7. I would like to address each of these proposed changes.

Section 4.3.1 "Height Limitations for School Age Children" The draft states that the maximum accessible height for school age children is to be 8 feet.

I do not believe it is necessary to limit the height of playground equipment. Limiting the height of playground equipment will reduce the play value significantly. I have school age children of my own and it is obvious that the taller play structures have a greater play value to them than the shorter ones. Limiting the height will only limit the child's own confidence. If the children cannot find play equipment that challenges their own confidence they may look for something more hazardous. I believe that the main purpose for the equipment is to build confidence and strength in children.

Protective surfacing material is available for heights in excess of 12 feet that will meet the CPSC's own cushioning requirements. ASTM standards F1487 and F1292 do not limit heights of play equipment. Currently there are many items such as slides in service at this time and have been for many years. These items are currently greater than the height limits proposed. They are used by hundreds of children everyday and no injury data is available to support the CPSC's position for the height limit.

Section 12.1.5 "Horizontal Ladders and Overhead Rings" The draft states that the maximum allowable height for horizontal ladders and overhead rings is to be 78 inches.

I do not feel that the 78 inch maximum height for horizontal ladders and overhead rings is justified. ASTM F1487 and the North American Harmonization Draft Standard both have 84 inch maximum height. This allows a maximum user in the 95th percentile 12 year old to use the equipment and still have ground clearance for their feet. Much of this type of equipment is installed at the 84 inch height. No injury data indicates this height is a hazard. It has been observed and reported to the ASTM that 78 inches is too low for 4th, 5th, & 6th graders to use. This section also contains a change that

eliminates the use of rungs for take-off and landing. at least one rung for take-off should at least be allowed.

Section 12.1.7 "Climbing Ropes" This section states that climbing ropes are not recommended because of a strangulation hazard.

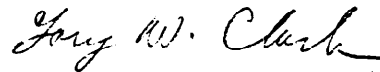
Revisions being proposed for ASTM F1487 will eliminate this hazard. The revisions are as follows.

1. A climbing rope shall be securely anchored at both ends.
2. A climbing rope shall not be capable of being looped back on itself, creating an inside loop perimeter greater than 5".

If you recommend eliminating climbing ropes, you will be eliminating valuable exercise and confidence building play from playgrounds.

The above concerns that I have stated, I can only hope that you will give consideration to before changing the hand book. Let us keep the physical and mental challenges in our children's play as well as safety.

Sincerely,



Gary W. Clark

Kathleen A. Geyer  
631 W. Pleasant Street  
Aurora, Missouri 65605  
(417) 678-3303

6-24-97

Mr. John Preston, P. E.  
Directorate for Engineering Sciences  
U. S. Consumer Product Safety Commission  
4330 East West Highway, Suite 611  
Bethesda, MD 20814-4408  
FAX: (301) 504-0533

Mr. John Preston,

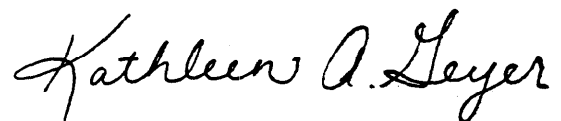
Many of the revisions to the CPSC handbook are unnecessary. *CPSC should conform its handbook standards with ASTM.* The following points express my views against the proposed changes.

1. There is protective surfacing material available for heights over 12 feet that meet the CPSC's requirements, so limit heights are not necessary.
2. *CPSC should conform its handbook standards with ASTM.* Neither the ASTM F1487 nor the ASTM F1292 standard limits heights of play equipment.
3. There are no facts to support the CPSC's position on height requirements. Hundreds of children everyday use item, such as slides, that are taller than the draft recommendations, yielding hundreds of millions of opportunities for injuries if there were any hazards associated with the height.

4. Lowering horizontal ladders from 84 inches to 78 inches will limit the play value to younger children. Lowering the height will cause 4th, 5th, and 6th graders to drag their feet.
5. Eliminating the use of rungs for take-off and landing on overhead ladders and overhead rings will limit the use of this play equipment to older children. Without rungs on at least one end of equipment of this type, it will be impossible for younger children to use it.
6. Do not eliminate the use of climbing ropes. *CPSC should conform its handbook standards with ASTM.* ASTM currently requires that climbing ropes be securely anchored on both ends to eliminate the potential for strangulation. Also, there is a revision to the ASTM standard in progress that would require that no loop could be formed which would be large enough to allow it to wrap around a child's neck.
7. Do not require footing inspections by a building code official. Most localities do not currently have this requirement and those that do usually do not have inspectors qualified to perform the inspections.

Thank you for considering my arguments.

Sincerely,

A handwritten signature in cursive script that reads "Kathleen A. Geyer".

Kathleen A. Geyer

June 26, 1997

Mr. John Preston, P.E.  
Directorate for Engineering Sciences  
U.S. Consumer Product Safety Commission  
4330 East Highway, Suite 611  
Bethesda, MD 20814-4408

Dear Mr. Preston

As a mother of 3 children I am writing to express my disagreement on the proposed CPSC 1997 Draft Revision to the "Handbook for Public Playground Safety."

I feel there should be no height limitation for Playground Equipment. As I understand, it says in the ASTM guidelines F1292 that surfacing is required of any height of playground equipment. I also understand that a fall from a 2 foot high piece of playground equipment on to concrete is far more dangerous than a fall from a 12 foot piece of equipment on to adequate surfacing.

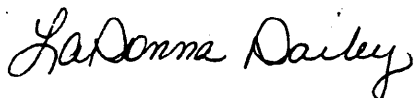
I do not think lowering the height will reduce Playground injuries. If ALL Playground Equipment had the right surfacing think of how many injuries could be prevented.

I believe that lowering horizontal ladders would only cause more problems because the older children would want to try using the equipment causing them to drag their feet which would limit usage.

If ASTM requires that a climbing rope be anchored at both ends and a proposed revision requires that the rope does not create a loop in excess of 5" I don't see a strangulation hazard.

I appreciate the concern for safety and regulations on Playground Equipment but I also feel that this is the only adventure & confidence builder that some children ever come in contact with, I hope you will take this into consideration.

Sincerely,



LaDonna Dailey  
Rt. 2 Box 236A  
Purdy, MO 65734

Section 12.1.7

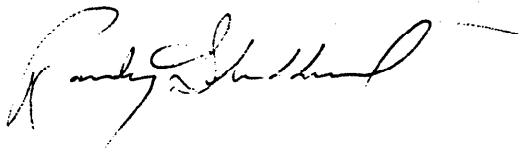
Once again, there is no definable advantage to the proposed measure of eliminating all climbing ropes. ASTM F1487 already requires that climbing ropes be securely anchored on both ends, and a revision currently being considered is a requirement that no loop large enough to be considered dangerous could be formed on an ASTM approved anchored climbing rope. This measure seems reasonable and in no way compromises the safety of a child, while still providing the play value found in the traditional climbing rope. Clearly CPSC should lead the way in being the first to adopt both the current and proposed ASTM provisions regarding climbing ropes.

Section 7.1.1.

While well-intentioned, a requirement that demands that footings be inspected by a building code official would in no way serve the purpose for which it is intended. The reality of the situation is that most local administrations do not have qualified officials competent to perform this task. The end result is that substandard installations would be allowed in addition to increasing the cost of both installation and city administration with no discernable advantage to either.

As someone with formal training and hands-on experience in child development, as well as having nieces and nephews of playground age, I urge you to reconsider the proposed revisions to the CPSC handbook I've mentioned. After a lengthy history of commendable sound, logical decisions based on a criteria of the premium development and welfare of children, it would indeed be a shame for CPSC to set a precedent of ill-conceived requirements based on a lack of information, misrepresented data, and distorted logic, regardless of a how well-intentioned. I wish you continued success in our mutual endeavor to insure a better world for the coming generations.

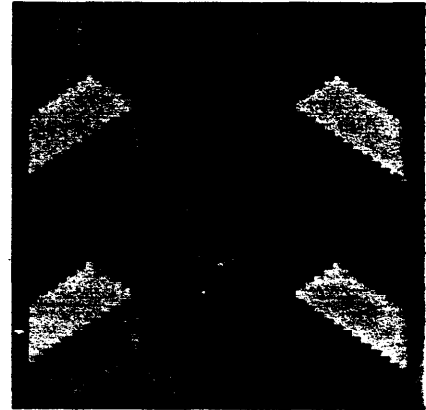
Sincerely,



**Randy Studdard**

604 Pleasant Drive \* Monett, MO 65708 \* (417) 235-0829

Mr. John Preston, P.E  
Directorite for Engineering Sciences  
U.S. Consumer Product Safety Commission  
4330 East West Highway, Suite 611  
Bethesda, MD 20814-4408



Dear Mr. Preston:

It has come to my attention that CPSC is proposing to make certain changes to the Handbook for Public Playground Safety, specifically sections 4.3.1, 12.1.5, 12.1.7, and 7.1.1. After reviewing these proposed revisions, I believe the changes are unnecessary and will result only in decreased play value for children while providing playground manufacturers with lesser standards, opportunities for greater distribution further resulting in less safe playground environment. This defeats the very purpose of the CPSC.

Specifically:

Section 4.3.1.

There is no definable advantage to limiting the height requirements on equipment to 8'. As long as surfacing materials which meet current ASTM cushioning requirements are in place, no additional safety is gained and play value is significantly reduced when height in the play environment is limited. As an authoritative expert on youth recreation with formal training in child development (BA in Education, NOSU, 1977), years of hands-on field experience (Assistant Director, Tulsa YMCA camp, 1974-7, 79), and commercial experience as a reviewer and product evaluator (Nintendo, Taito America), there is no question that **height can well enhance a play experience for school age children. Indeed, an regular exposure to height in a safe environment is essential to a child's development.**

Section 12.1.5.

To decrease the height of horizontal climbers from 84" to 78", will cause them to be too low to be used by many of the older children who otherwise would utilize this equipment frequently (approximate ages 9 through 12 or grades 4 through 6) since their feet would drag the ground. The elimination of step rungs for entry and exit on this equipment eliminates the younger and smaller children from using the equipment. Were the revisions in this section to become reality, only a miniscule portion of the child-user population would be able to use this equipment at any given time and then only for as long as the quickly growing child remained within the height parameters which allowed him to fit the equipment. This, in effect, dictates that the child must fit the equipment, rather than the current play systems which are constructed to adapt to children of all sizes and ages. Obviously, no safety measure is gained with such a proposal. It is evident that the maximum 84" height for horizontal ladders and overhead ring climbers should remain in place. In addition, the use of step rungs on at least one end must be maintained to allow for use by the broadest spectrum of the child-user population.



**Vickie Shaffer**  
**Rt.1 Box 1762-5**  
**Shell Knob, MO 65747**

---

John Preston  
Directorate for Engineering Sciences  
U.S. Consumer Products Safety Commission  
4330 East West Highway, Suite 611  
Bethesda, MD 20814-4408

Dear Mr. Preston

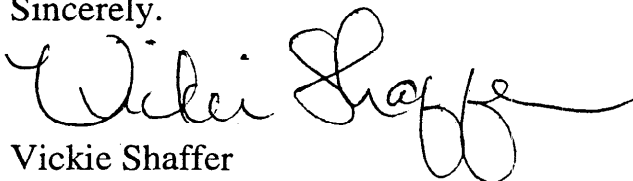
I would like to comment on the proposed revisions to the Handbook on Public Playground Safety. I strongly oppose the addition of section 4.3.1 limiting the height of non-enclosed play surfaces. The proposed 8 foot height limitation is an arbitrary limit that is not supported by data of facts. Enforcing this limitation will significantly reduce the play value of the equipment without providing any known safety enhancement.

Impact absorbing material is easily available that meet your CPSC requirements for a 12 foot fall height. Limiting height to a lesser value is unnecessary.

Certified playground equipment manufacturers are supplying safe equipment. Inspectors are ensuring that the equipment remains within safety guidelines, which includes sufficient protective surfacing. Sufficient surfacing for a 12 foot fall height is equally protective as an 8 foot fall onto a similarly protected surface.

Please take a moment to reconsider the height limitation as proposed in the 1997 draft revision. The addition of this section will not enhance public safety only limit the enjoyment for the users.

Sincerely,

  
Vickie Shaffer