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

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 it is unnecessary to limit the height of playground equipment as there are no facts to support this change. There are numerous opportunities for injuries if there were any true hazards associated with the height. Limiting the height will drastically reduce the play value, excitement, adventure, etc. of the equipment which in turn may cause children to seek out something more exciting and dangerous on which to play. There is protective surfacing material available for heights over 12 feet that meet the CPSC's own requirements. Neither the ASTM F1487 nor ASTM F1292 standard limits the heights of play equipment

I believe lowering horizontal ladders from 84 inches to 78 inches is not justified as no injury data indicates that this height is a hazard. Lowering the height will limit the kids that will use this equipment because it will cause 4th, 5th and 6th graders to drag their feet. 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 the equipment. At least one rung for take-off should be allowed.

Climbing ropes should not be eliminated because ASTM F1487 requires that climbing ropes be securely anchored on both ends and a proposed revision that requires that the rope does not create a loop in excess of 5" which eliminates a strangulation hazard.

I have been a foster parent for many years and realize the positive benefits that playground equipment has on children. I appreciate the concern for safety and regulations on playground equipment but I also know that we need to foster our children's sense of adventure and build their confidences and physical strengths.

I feel that CPSC should conform its handbook standard with ASTM so there would be only one set of regulations which would eliminate a lot of confusion with the general public.

Respectfully

Teri Fields

Teri Fields
Rt. 1 Box 191A
Wentworth, MO 64873

Ms. Deanna LaMastus
1152 Highway Z
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
FAX: (301)504-0533

Dear Mr. Preston:

I understand that several revisions have been proposed to the "Handbook for Public Playground Safety". I would like to present my opinion and recommendations for the following Sections in the CPSC 1997 Draft Revision.

Section 4.3.1 Recommended Maximum Accessible Height for School Age Children

The Draft states that the highest accessible part of the equipment is to be (8) feet. With the proper surfacing, what is the hazard of equipment over (8) feet? Protective surfacing is available for heights in excess of 12 feet that meet CPSC's very own requirements for surfacing. Play equipment is not limited on the heights by the ASTM F1487 nor the ASTM F1292 standard. Based on this information, I think the CPSU should not put these limitation of the height on play equipment and join with ASTM standards that concentrate on the correct protective surfacing for those heights.

Section 12.1.5 Horizontal Ladders and Overhead Rings

The Draft states that the horizontal ladders and overhead rings be lowered to 78". This would greatly limit the number of children that could get use out of these components. When you buy a play system for children, you want the children to get the most enjoyment out of it and the most time. According to a report submitted by Susan Antle to the ASTM subcommitte, horizontal ladders that were lowered to 78" were too low to be used by 4th,5th, and 6th graders in her schools. The North American Harmonization Draft Standard and the ASTM F1487 both have a standard maximum height of 84". Why shouldn't all the school age children (5-12ages) have the same and equal opportunities on the play equipment? I think the that the maximum height should stay at a maximum of 84" . I also believe that at least one rung should be used at one end of freestanding equipment of this type. Without the use of one rung, it would be very difficult for take-off on these components.

Section 12.1.7 Climbing Ropes

The Draft is eliminating the use of climbing ropes because of the potential for strangulation. Strangulation can be prevented with certain precautions. Climbing ropes can be secured by anchoring at both ends which is currently required by ASTM F1487. Another precaution is to make sure that there is not enough slack in the rope to allow a loop to be created. This is a revision that is in the proposed ASTM provisions. Instead of making these components obsolete to our children, why not improve them by adopting the ASTM requirements and proposed provisions.

I hope you will take my suggestions and recommendations in to consideration. Thank you for your time.

Sincerely Yours,

Deanna LaMastus

Deanna LaMastus

CHRIS LEAMON
117 E SOUTH ST.
AURORA MO. 65605

MR. John Preston:

I am writing in light of the CPSC 1997 Draft Revision, and to oppose it.

The issue on limiting heights of play equipment for school age children should be deleted. The ASTM F1292 takes care of the height limitations by using the proper protective surfacing under and around the equipment. With the proper surfacing being used around the components a fall from a 10ft. deck would have less severity than a fall from a five (5)ft. deck without the proper surfacing. Therefor CPSC should be more concerned on making sure the proper surfacing is being used around the playsystems and components, not limiting the heights of the components. If the improper surfacing is being used then lowering the equipment is not the problem..... the surfacing is.

Limiting the height of the equipment to only eight (8)ft. would also limit the overall play value and excitement for the children. Children become excited in seeing a BIG slide rather than a small slide. Small short slides just don't deliver what a big slide high in the sky can. The play experience more enjoyable with a ride on a slide that last more than one (1) second.

Climbing ropes should not be eliminated from playgrounds. This kind of equipment tests a child's physical strengths and helps work on those strengths, more than that it is fun to climb on. Strangulation would not be a threat if the ropes were to be installed correctly. As in the ASTM F1487 climbing ropes must be securely attached on both ends. There is also a revision to the ASTM standard in progress that would require that no loop could be created in the rope. By eliminating most of the slack in the rope the possibility for strangulation would also be eliminated.

SINCERELY

Chris Leamon

Chris Leamon

Author: Amy J. Palman at CPSC-HQ1
Date: 7/2/97 4:00 PM
Priority: Normal
TO: John D. Preston at CPSC-HQ2
Subject: Handbook for Public Playground Safety revisions
---------- Message Contents ----------

FOR U. dec

---------- Forward Header ----------
Subject: Handbook for Public Playground Safety revisions
Author:
/G=Steve/S=Brown/DT=ID/DV=internet!elnet.com!sbrown/O=ATTMAIL/ADMD=ATTMAIL/C=US
at CPSC-x400
Date: 6/30/97 6:53 PM

Mr. John Preston
Directorate for Engineering Sciences
US Consumer Product Safety Commission

Dear Mr. Preston,

Below are a few of my comments on the draft of proposed Handbook for Public Playground Safety revisions:

First, section 4.3.1, Height Limitations for School Age Children. It's my feeling that limiting the height to 8' dramatically reduces the play value of the equipment. There are thousands of components, including slides, that are taller than the draft recommendations that have been in the field for many years. These components have been used by hundreds fo children every day yielding millions of opportunities for injury if there were truly any hazard associated with height - there is no such data to support the CPSC's position. Futhermore, there is protective surfacing material available for heights in excess of 12' that meet the CPSC's own requirements, it is not necessary to arbitrarily limit heights. Neither the ASTM F1487 nor the ASTM F1292 place such limits on heights, the CPSC should accept the work of these groups and harmonize its Handbook's comments with ASTM.

Second, section 12.1.5, Horizontal Ladders and Overhead Rings. If horizontal ladders are lowered from 84" to 78" they'll be too low for 4th, 5th and 6th grade users, who will drag their feet. Additionally, this section contains a change that eliminates the use of rungs for take off and landing on horizontal ladders and overhead rings. Without the use of rungs at least on one end of freestanding equipment of this type, it will be virtually impossible for anyone but the largest of users to use the equipment.

Third, sections 12.1.7, Climbing Ropes. The CPSC draft proposes eliminating the use of climbing ropes because of the potential for strangulation. ASTM F1487 currently requires that climbing ropes be securely anchored on both ends, and a revision in progress requiring that no loop formed would be large enough to allow it to be wrapped around a child's neck. The CPSC should adopt the current and proposed ASTM provisions for climbing ropes.

Lastly, section 7.1.1, Stability. This sections states that footings may be required to be inspected by a building code official. Most localities do not currently have this requirement and those that do typically don't have inspectors qualified to perform the inspections. This statement should be removed.

I've watched playground equipment over the last 10 years become boring and less challenging. It is imperative that playground equipment today not only challenge our children, but offer them the chance to develop characteristics that are essential in growing up, both phyically AND mentally. I hope your committee will keep this in mind.

Sincerely,

Steve Brown

Geneva, Illinois

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

July 3, 1997

Dear Sir:

I was recently sent the information about further limitations to the play equipment available for commercial use. I have long been an advocate of safety in play ground equipment and have been working with several play equipment suppliers over the past twenty plus years for both safer and longer lasting equipment. Over the last five years, I have seen the "play " being dictated out of the equipment available for use in our parks because of the guidelines being instituted rather than letting the equipment suppliers work on safer equipment by design. In most cases, it is not the equipment that is unsafe, it is how the users chose to abusively play on the equipment, and the lack of proper parental supervision that results in accidents and injuries. This is in some cases coupled with poor maintenance generally in cases where municipalities do not have a comprehensive program for maintenance or the staff to spare to properly check the equipment. Budget limitations and lack of trained staff or staff available for the safety inspections is a prime cause for the equipment lapsing into unsafe conditions. The imposed limitations tend to increase the cost of the equipment produced limiting the Municipalities ability to provide safe equipment.

Section 4.3.1 Height Limitations:

Height limitations on play equipment is a typical item that should not be dictated by required standards. The loss of large swings 12' high is typical of the lack of concern for the users. The teenagers and adults are the primary users of the larger swings and they are no longer available. Children generally know their limitations and rarely stretch their zone of comfort. It is important to provide safe play areas with challenges for the older and younger children or they will typically go elsewhere to find them. A typical example is where children have placed ropes in trees 50' high off the ground on the side of a hill making the drop 30' or more, because the play equipment was no longer a challenge (the play ground was within 300 feet of the the area where the rope was installed).

Section 12.1.5 Horizontal ladders and Overhead Rings:

Lowering the heights of these pieces of equipment greatly reduces the number of users. The heights of children at younger ages is increasing with 5' and 6' children in elementary and middle schools. The heights should at least accommodate 6' individuals hanging with the proper allowance for cushion materials as a base. The first bar or ring should be no more than 6" from the standing rung on the ladder or platform. The greatest chance for falling is in reaching for the first rung. Limiting the placement of the rung reduces the number of potential users and increases the risk of injury by those smaller children ready to test themselves.

Section 12.1.7 Climbing Ropes:

This goes back to my earlier statement , if it is not provided in a safe environment the children will improvise in a more challenging fashion. The requirement for anchoring the ropes top and bottom is sufficient to remove the possibility of hanging. Ropes that provide some slack but not enough for a ring to be made are best for climbing so the child can wrap his or her leg around the rope to climb. This is one of the few items for large muscle development in the arms available for taller children.

Section 7.1.1 Stability:

Requiring inspectors for the installation of the equipment footings is totally unnecessary. The equipment suppliers provide footing information and the installers should know the importance for following the guidelines. Requiring footing inspections will over tax Inspection Departments that are already

overloaded with life threatening items to check and in many of the smaller communities they don't even exist. The State is requested to provide inspectors for major structures and they are already spread thin covering the normal building footings required.

The emphasis of your guidelines should not be to restrict the creative ability of the equipment suppliers but to provide a minimum checklist for the untrained to follow to insure the safety of the equipment they want to build or install. The people I typically recommend to obtain the CPSC Handbooks are the day care owners looking for assistance, the church group that wants to get volunteers to build the play piece for the church children, and the homeowner that wants to build a piece in their back yard. I also have advised some of the smaller community groups like the YMCA and small town staff that call for advise in selection and purchase of equipment to start with the handbook so they know what to look for in the equipment and most importantly the maintenance of the equipment. The people that don't know what an ASTM is are looking to the information in your handbook for help to get them by. Develop the kind of information that makes the ASTM requirements simpler to understand and that identifies the safety areas to look at and you will be doing a greater service than to limit the equipment available to the users.

This is coming from an individual who grew up on a playground and was a playground instructor from 1950 to 1962, and has since designed play areas for the past 20+ years. It is difficult enough to get sufficient play value for the wide range of public users now. The limitations that have already been instituted have greatly reduced the fun for the older users. No more limitations are needed and I personally feel that some restrictions such as swing heights should be eliminated.

This is my opinion and in no way reflects the opinion of the City of Raleigh, or the Parks and Recreation Department for which I work. I have always tried to provide the most challenging play areas, with the highest play value for the dollars available, to serve the most people, when I buy or specify the equipment.

Sincerely,

John M. Hoppe
Landscape Architect