

CPSA 6 (b)(1) Cleared

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Log of Meeting
Consumer Product Safety Commission
Directorate for Engineering Sciences

Subject: Meeting with the Backyard Play Set Manufacturers

Date of Meeting: September 20, 1995 Place: Bethesda, Maryland

Log of Entry Source: Troy Whitfield, ESME/CPSC

Attendees: see attached list

Summary of Meeting:

The meeting with back yard play set manufacturers was requested by CPSC to discuss certain issues associated with a petition submitted by the New York Department of Consumer Affairs regarding home playground equipment and the roles of Industry, ASTM, and the CPSC in addressing these issues. The purpose of the meeting was to explain where CPSC was and what has been learned while evaluating the petition and to share the results of CPSC testing of home playground equipment to the ASTM F1148-93 Voluntary Standard. The manufacturers were asked to attend the meeting to provide insight and industry opinion on several issues of concern to CPSC staff. Andrew Stadnik opened the meeting at 10:00 am and introductions were made.

Mark Eilbert discussed the results of the staff's conformance testing of twelve play sets and presented an overview of the conformance in three major categories; labeling and instructional requirements, dimensional tests, and structural tests. The compliance to the labelling and instructional requirements was found to be 83% and no play set was found to meet all applicable requirements. In the dimensional category, compliance was found to be 82%, with two play set samples meeting all applicable requirements. Compliance to the structural requirements was found to be 80%, with five play sets meeting all applicable requirements. For all requirements, the overall sample compliance was found to be 82%, with individual play set compliance ranging from 67% to 88% among the samples. Manufacturers were very interested in the results and requested hard copies of the presentation package which staff will provide. They also requested copies of the staff's test methodology and pass/fail criteria to help determine if there are any differences in manufacturers' and staff's interpretation of the standard.

After discussing the test results and criteria, Mr. Stadnik focused the group on four issues the staff believes should be addressed by the ASTM voluntary standard or directly by the manufacturers. The subjects; impact-absorbing surfacing guidelines, multiple-occupancy swings, guardrails on platforms over 30" high, and anchoring of play sets, were discussed at length.

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1. Surfacing Guidelines

The group was interested in the idea of incorporating an information sheet on appropriate surfacing materials. Several manufacturers are already including such information with their instructions. Other questions discussed included, would other hazards be created by using the material (small parts, splinters, would children attempt to "jump" beyond the surfaced area), are consumers likely to maintain and replace the surface as needed or necessary, will consumers actually use the material and install it as recommended? There was general agreement among the group that consumers should be educated on the importance of using an impact-absorbing surface material.

2. Multiple-Occupancy Swing Testing

The staff tested several multiple-occupancy swings to the single-occupancy requirement and found that some could meet the maximum 100g impact requirement. Lindsay Harris (Fisher-Price) agreed that something needed to be written in the standard to address impact injuries from these types of swings. Paul Brogan (Hedstrom Corporation) stated that he and John Preston (CPSC) were developing requirements for impact testing. Mr. Brogan talked about the play value of the swings, aspects of the ride which make it attractive, and whether they are needed. Teri Hendy (Site Masters Inc./ASTM) stated that multiple-occupancy swings may be eliminated if a suitable test procedure/criteria cannot be developed. The group agreed that a viable test could be and needed to be developed.

3. Guardrails on Platforms

The discussion regarding guardrails began with manufacturers' questions on the type of data CPSC has available. There were questions whether platforms are in existence on a large scale on back yard playground equipment and, if so, were they without guardrails. Lindsay Harris also questioned whether the fall related injuries involved climbing incidents and whether guardrails were present or not. The staff's current information does not contain enough detail to make those determinations. Mr. Harris pointed out that some equipment is designed to be climbed and that access to the platform involves climbing over the guardrail. There is currently a proposal being discussed by the ASTM Subcommittee members on platforms and guardrail height based on the user and their center-of-gravity. One issue within ASTM is, what constitutes a guardrail? Is it intended as a handrail, in which case it is subject to handgripping requirements, or is it needed to provide structural support and integrity, or both? The manufacturers agreed that the issue needs to be looked at even though the data may not suggest the necessity of a change in the current standard.

4. Anchoring

Staff expressed concern that the current standard may not be explicit or clear enough regarding anchoring instructions. Staff would like to see manufacturers provide more information on various methods of anchoring and the need for it. There is a proposed change in the current stability requirements of the standard which has passed the committee level and is currently at the society level for consideration. This change would allow sets which

manufacturers require to be anchored to be tested on a 5° slope with anchors installed. The 1991 version of the standard made the distinction between "in-ground" exercise type play sets which must be anchored in cement per manufacturers' instructions and other type play sets. In-ground exercisers were exempt from stability tests and other types were chocked in place but tested unanchored. CPSC staff indicated they are not pleased with the current proposed change in the stability test which would allow anchoring during testing. However, changes to Section 8.2.3 of the standard, which deals with consumer information and instructions on anchoring, could make the proposal acceptable.

The meeting adjourned with CPSC agreeing to provide hardcopy of Mark Eilbert's presentation, test methodology and pass/fail criteria, and the procedure used by Epidemiology to provide statistical data. Industry agreed to further consider the issues brought forth by the CPSC.

CPSC/INDUSTRY MEETING SEPT. 20, 1995

Sign-in Sheet

<u>Name</u>	<u>Firm</u>
<u>Joe M. Wilkerson</u>	<u>Roadmaster</u>
<u>Darrin R. Earhart</u>	<u>Roadmaster</u>
<u>Matthew T. Bolland</u>	<u>Swing-N-Slide</u>
<u>Todd Leeuwenburgh</u>	<u>Product Safety Letter</u>
<u>Ron Lynn</u>	<u>Gym-N-I Playgrounds</u>
<u>Bonnie Caddell</u>	<u>Gym-N-I Playgrounds</u>
<u>Jeffrey Locker</u>	<u>Locker, Greenber & Brainin P.C.</u>
<u>Teri Hendy</u>	<u>Site Masters Inc./ASTM</u>
<u>Milton Bush</u>	<u>The M Companies</u>
<u>Jean Schappet</u>	<u>Woodset Inc./ASTM</u>
<u>Alan Plotkin</u>	<u>Hedstrom</u>
<u>Paul J. Brogran</u>	<u>Hedstrom</u>
<u>James R. King</u>	<u>The Little Tikes Company</u>
<u>Jerry Lynch</u>	<u>The Little Tikes Company</u>
<u>Chuck Obendorf</u>	<u>Step 2 Corporation</u>
<u>Kitty Pilarz</u>	<u>Fisher-Price</u>
<u>Tina Zinter</u>	<u>Fisher-Price</u>
<u>Lindsay Harris</u>	<u>Fisher-Price</u>
<u>Michael J Goldstein</u>	<u>Rainbow Play Systems</u>
<u>Donald Hoffman</u>	<u>Creative Playthings Ltd.</u>
<u>Francis W. Hunnewell</u>	<u>Child Life Inc.</u>
<u>John M. Whalen</u>	<u>BNA</u>
<u>Lois Goldman</u>	<u>Consumer</u>

CPSC Attendees

Andrew Stadnik
Mark Eilbert
Troy Whitfield
Mary Donaldson
Pary A. Davis
Celestine Trainor
George F. Sushinsky
Suad Nakamura
Stephen Lemberg
Ellen Schmidt
Jacque Elder
John Preston
Manon Boudreault
Jean Kennedy
Debbie Tinsworth