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TRANSMITTED VIA BALLOT COMMENT

Jon Robinson
ASTM Subcommittee Chair for ASTM Expansion Gates and Expandable Enclosures
100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

Re: ASTM F15.16 Expansion Gates and Expandable Enclosures Ballot F15 (20-08) Item 4

Dear Mr. Robinson:

This letter responds to ASTM ballot F15 (20-08), item 4, *Ballot for Revision to F1004 Consumer Safety Specification for Expansion Gates and Expandable Enclosures*, related to the performance requirements for visual side-pressure indicators. CPSC staff¹ appreciates the effort of the subcommittee to address visual side-pressure indicators, as the Commission voted to issue the gates mandatory standard with the addition of such requirements.

CPSC staff submits the following editorial comments, to address some minor differences between the ballot and the Commission's final rule:

- In 6.X.2.1, 6.X.2.2, and 6.X.2.3: The term defined is "visual side pressure indicators," so each instance of "side pressure indicators" should include the term "visual," to increase clarity.
- Staff recommends hyphenating "side-pressure" and "pressure-mounted" throughout, because the term is used as an adjective to indicators, and the hyphen grammatically indicates it's a collective term.
- In 6.X, staff recommends replacing "provide wall cups or other mounting hardware" with "require the use of Pressure-Mounted Gate-Mounting Hardware per 6.7," to clarify that the requirement is conditional and only for those wall cups or other mounting hardware that meet the requirements of 6.7, which provides for wall cups to be attached to the gate at the point of sale and references the test methods in 6.3.1.

¹ The views and opinions expressed in this letter are solely those of CPSC staff; it has not been reviewed or approved by, and does not necessarily represent, the views of, the Commission.

- In 6.X.2, staff recommends the following modification for clarity and to harmonize with the final rule for Gates²: “Such indicators, when the gate is tested in accordance with 7.9, shall indicate when the required side pressure has been attained upon installation of the gate, and continue to ~~indicate~~ display the side-pressure status while the gate is in ~~any~~ a manufacturer’s recommended use position.”

Thank you for considering these comments.

Sincerely,

Hope E J. Nesteruk

cc: Patricia Edwards, CPSC Voluntary Standards Coordinator

² <https://www.regulations.gov/document?D=CPSC-2019-0014-0009>