



Dear ACCT Members,

In the summer of 2018 ASTM F2959 proposed a ballot which removed exclusions from the scope of the standards. ACCT members who are also part of ASTM responded with concern. At the October 2018 meeting in San Diego, ASTM leadership agreed to table the scope exclusion ballot until October 2019. The original ballot is still tabled. The tabling of that ballot -- F24 (18-04) -- is clearly shown in the minutes from the October 2018 meeting.

Recently, ASTM released a Main Committee Ballot for Amusement Rides and Devices F24 (19-03). One of the items on this ballot would change the defined scope of the F2959. The ballot item would remove the exclusion for some types of courses from the scope of the standard.

The current ballot has different language from the 2018 ballot and is an attempt to address the concerns of the raised during the first ballot. In an email Jeff Borba of the EVO taskforce at F24, stated that inclusion of this exclusion item is intended to allow sufficient time for meaningful conversation on this issue.

In looking at this issue, it is important to remember the following. The current ANSI Standards do not have exclusions in their scope. In nearly all cases, whether or not a standard is used or applied in regulation is decided by the legislation or the regulatory writing process and the scope of a standard has no impact on either of those processes. Scope of standards exist primarily for standards writers to help them write clean, clear and effective standards. To help illustrate this point imagine trying to write a meaningful standard for all applications of harness. Writers need to understand what use the harness will have so they can write a good standard.

What to do. First don't panic. If you are a voting ASTM member, please read this ballot item carefully. ACCT strongly encourages you to evaluate how this change could affect the industry and respond as directed in the ballot. If you are not a voting ASTM member, talk to your Professional Vendor Member and ask them about the ballot and ask them to share your written feedback and concerns as part of their ballot. They can do this with attachments to their ballot if they make comments.

Finally, read ANY proposed standard carefully and completely. Take time to formulate and communicate useful comments which help standards writers get the language as clean, tight and effective as possible. This is true of affirmative and negative comments. So, sit down with a glass of warm milk or scotch and read, ponder and write carefully.

Sincerely,

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