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Comment from Tara Troxel

Posted by the **Consumer Product Safety Commission** on Feb 3, 2025

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I support the CPSC's proposal to conduct human slip research using bathtubs to measure the friction demand of human volunteers stepping into and out of the bathtubs when dry and wet. This is much needed research that will further the industry's understanding of how to mitigate bathing facility slip and fall occurrences. Comparing the human biomechanics to the frictional properties of the bathing surface is essential to understand the required friction needed to prevent slips. Unfortunately, it appears that this study will not evaluate the measured available friction of the surfaces. Furthermore, a sample size of three bathtubs is rather small and may not be representative of all manufacturing processes currently on the market. Please consider modifying this proposal to include available friction testing using the Pendulum method developed in CPSC project 61320621Q0068.

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