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# Comment from Peter Townsend

Posted by the **Consumer Product Safety Commission** on Feb 18, 2025

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While I support continued research on bathing surface safety. The proposed study seems to be limited and it is unclear how the results of the study will be useful in developing a bathtub safety standard if no method of measuring the surfaces in accordance with the Pendulum method developed in CPSC project 61320621Q0068 is employed. The small sample size also reduces the likelihood that a frictional "safety threshold" will be identified.

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