

COMMENTS ON LEGISLATIVE COUNCIL CLEARINGHOUSE REPORT

Clearinghouse Rule No. 11-003

Rule No.: Chapter Comm 9

Relating to: Anchoring and Securing of Movable Soccer Goals

2. Form, Style and Placement in Administrative Code

- a. The ASTM standard F2056 indicates the risk posed by movable soccer goals is from tipping over or pulling over the goal; therefore the term “overturning” is preferred in that it covers both types of risks.
- c. The term “substantially” is subjective and its insertion without further definition or specification would not provide greater clarity as to intent or compliance.
- d. The gap in numbering is intentional to allow flexibility in further rule development.

4. Adequacy of References to Related Statutes, Rules and Forms

- a. It is unclear what purpose the suggested note would serve.
- b. The definition for “public land” has been revised.

5. Clarity, Grammar, Punctuation and Use of Plain Language

a. The Department uses the “SCOPE” to delineate or define the objects addressed under a code. The “APPLICATION” is used to delineate when or how the rules are applied. The suggested language fails to include existing movable soccer goals and use of the term “erected” does not accurately reflect the relocation of a goal.

b. Even though it may be somewhat redundant the Department wants to make it clear that the relocation of existing goals is covered by these rules. The Department is not specifying various ways of securement; rather the rules acknowledge that certain methods will accomplish the object, but are not the only way.

c. The intent is not to limit the methods for anchoring or securing of movable soccer goals to those described in “guidelines”. There may be many viable methods and products now in the future not described in the referenced “guidelines”, especially in light of that many existing movable soccer goals are “homemade”.

d. See response under 2. a. The comment is unclear as to the issue concerning labels. The labels under the guidelines of ASTM F1938 are referenced as examples; the only specification under ASTM F2056 is that the labels be orange.

- e. The Department prefers that the rule be written as a “shall” mandate.