



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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August 31, 2016

Mr. Ralph Vasami
Executive Director
Window Covering Manufacturers Association
355 Lexington Avenue
New York, NY 10017

Dear Mr. Vasami:

U.S. Consumer Product Safety Commission (CPSC) staff would like to thank you and the technical representatives from member companies of the Window Covering Manufacturers Association (WCMA) for participating in the technical meeting held on August 2, 2016 at our National Product Testing and Evaluation Center.¹ Staff strongly supports WCMA's intention to reopen ANSI/WCMA A100.1-2014, *American National Standard for Corded Window Covering Products*, to develop stronger performance requirements that will effectively reduce the risk of the strangulation hazard to children.²

Staff strongly supports the overall direction you stated you intend to take in addressing the strangulation hazard, by developing performance requirements such that window coverings (1) have inaccessible operating cords³, or (2) have short operating cords that cannot form a hazardous loop, or (3) do not have operating cords. Staff looks forward to working with you, the industry members, and other interested stakeholders that will be participating in the development of the revised voluntary standard.

Staff strongly supports segmentation of the application of the revised performance requirements, to ensure inclusion of window coverings that can meet the performance requirements. You stated that WCMA intends to explore the areas that will have the greatest impact to reduce the

¹ The comments in this letter are those of the CPSC staff and have not been reviewed or approved by, and may not necessarily reflect, the views of, the Commission.

² American National Standard for Safety of Corded Window Covering Products, ANSI/WCMA A100.1-2014. New York, NY: Window Covering Manufacturers Association, Inc.

³ Operating cords include pull cords and continuous loop cords.

risk of child strangulation, while recognizing that there may be limited exceptions. Staff understands from your remarks that you will be evaluating different segmentation approaches, such as product categories, operating systems, applications and uses, distribution channels (*e.g.*, stock versus custom), location in home, size, weight, and geometry of the product, and ability of the products to be readily adaptable to new technologies. Staff agrees with your proposed approach of capturing the window coverings that could meet a revised standard at this time, rather than waiting until all window coverings could meet a revised standard. Staff looks forward to working with the voluntary standards committee in exploring and evaluating the various segmentation approaches.

Staff believes that this current effort can result in a voluntary standard that will effectively address the risk of strangulation from window coverings, and we therefore urge you to consider the hazard patterns identified in the incident data as the primary basis for your evaluation of the revised standard's effectiveness. Of the incidents that reportedly have occurred from January 1996 through July 2016, we describe below some of our findings:

- A total of 53% of the incidents involved horizontal blinds, followed, in order of frequency by, vertical blinds (15%) and Roman shades (11%).
- We were able to identify 46% of the products as stock and 15% of the products as custom-made; however, we were not able to identify whether the product was a stock or a custom-made product in 39% of the window coverings involved in the incidents. In other words, among products where the information on stock versus custom made was known, 75% were stock products, while 25% were custom-made.
- Out of the custom-made products identified, 48% were horizontal blinds and 20% were cellular shades, followed by Roman shades at 14%. Out of the stock products identified, 60% were horizontal blinds, followed by Roman shades and vertical blinds at 13% each.
- In terms of ownership, 109 incidents (37%) reportedly occurred in owned residences and 78 incidents (26%) occurred in rental residences while 35% is unknown. Seventeen incidents reportedly occurred in grandparents' residences, five incidents occurred in relatives' or friends' residences.
- We found that 21% of the window coverings were installed by consumers, 18% by professionals, including landlords; 18% were previously installed (*i.e.*, prior to consumers moving into the residence); and 43% were unknown.
- We also investigated the product width and length of window coverings and concluded that 56% of the 144 window coverings with known length were 60 inches or shorter; 24% were more than 60 inches and up to 70 inches; 15% were between 71 and 80 inches; and 4 percent were more than 80 inches. In terms of product width, 38% of the 146 window coverings with known width were less than 36 inches wide; 53% were between 36 and 71 inches wide; 7% were between 72 inches and 96 inches wide; and 2% were more than 96 inches wide.

Staff fully supports the next steps you have outlined, such as convening the steering committee, establishing the canvass body, determining the feasibility of developing a joint safety standard with Canadian Standards Association, engaging retailers and other key stakeholders to gain consensus, and having a standard ready to submit for ANSI ballot by the end of 2016. Staff continues to support the performance-based approach in revising the standard and finding ways to simplify the process to demonstrate compliance, where possible. Staff encourages you to include

Mr. Ralph Vasami
Page 3

open, in-person, technical public meetings as part of your voluntary standards revision process because staff believes that would be the most productive way to facilitate discussions among all interested subcommittee members on the technical issues associated with window coverings.

CPSC staff remains committed to working with the Association, its members, child safety advocates, and other interested stakeholders to develop an effective, comprehensive voluntary standard that will effectively address the strangulation risk associated with corded window coverings. If you have any questions or comments, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink that reads "GA Borlase". The letters are cursive and fluid, with the "GA" being particularly prominent.

George A. Borlase