



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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Mr. Ralph Vasami
Executive Director
Window Covering Manufacturers Association (WCMA)
355 Lexington Avenue
New York, NY 10017

Dear Mr. Vasami:

U.S. Consumer Product Safety Commission (CPSC) staff would like to clarify information regarding the window covering incidents referenced in recent letters. In our letter of January 24, 2017, CPSC staff identified that the consumer advocates' proposal is estimated to address more than 90 percent of the incidents.¹ You indicated in your letter of January 30, 2017, to Chairman Kaye that the CPSC's data "almost certainly includes incidents involving roman shades and other products with accessible rear cords capable of forming a hazardous loop. As these products have been effectively addressed by prior standard revisions, the number of products the 'hybrid' proposal would address is likely closer to the same percentage as a segmentation by stock versus custom products." Staff would like to submit the following information regarding the incidents so that all parties have an accurate understanding of the referenced data:

- CPSC staff analyzed 307 of the incidents that reportedly occurred between January 1996 and December 2016. Within these 307 incidents, 26 were associated with Roman shade *inner cords*. Staff was able to identify the product width and length in 18 of these 26 incidents, none of which had a width or length above 72 inches.
- As staff stated in the October 1, 2014, briefing package prepared in response to the petition CP 13-2, hazards associated with inner cords that may be present in various window coverings such as horizontal blinds, Roman shades, and cellular shades are considered to be adequately addressed in the ANSI/WCMA standard. If we exclude all inner cord incidents (including

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.

horizontal blinds, Roman shades, and cellular shades) from the above data set, 258 incidents remain to be addressed.

- Within these 258 incidents, staff was able to identify the cord type in 228 incidents. Four window coverings had widths and lengths both exceeding 72 inches; 6 window coverings had widths above 72 inches while the lengths were 72 inches or shorter; 4 window coverings had lengths exceeding 72 inches while the widths were 72 inches or narrower; and finally two incident window coverings had lengths exceeding 72 inches with unknown widths. Overall, a total of 16 incident window coverings was above the size specifications outlined in the consumer advocates' proposal. Thus, 212 out of 228 incidents would be addressed with the consumer advocates' proposal, which constitutes approximately 93% of the incidents.²

Based on the above analysis of reported incidents, staff reiterates its finding that the consumer advocates' proposal would likely be the most beneficial proposal for child safety because over 90 percent of incidents, with or without inner cord incidents figured into calculations, would be addressed with this proposal. If you have any question or comment, please feel free to contact me.

Sincerely,



Rana Balci-Sinha

Window Coverings Project Manager

² Staff was able to identify the product or window size in about 50 percent of the incidents. As we did in the estimates that were outlined in our January letter, the overall addressability figure is based on the assumption that same percentages apply to unknown sized window coverings.