



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 present their comments regarding the proposals submitted to the WCMA Steering Committee during the last few weeks.¹ Staff believes that the proposals demonstrate the benefits of an open and successfully managed standard development process, and staff hopes that all the proposals which have been made by the stakeholders are considered by the entire steering committee in an open and transparent manner. Below, we provide staff's comments on each of the outstanding proposals:

- *WCMA's current proposal*: Stock versus custom segmentation, in which stock products are required to have no cords, no accessible cords, or cords that do not exceed 12 inches in untensioned length. According to WCMA, this proposal addresses approximately 80 percent of the products sold in the market. Staff's preliminary assessment of the incidents reported to CPSC shows that 45 percent of incidents involved stock products, 16 percent involved custom products, and 39 percent of the products involved in the incidents could not be categorized.² If we assume that the unknown category has similar distribution as the identified 61 percent of the products, staff estimates that approximately 75 percent of the incidents would be addressed with this proposal.
- *Nien Made's proposal*: Allows no cords for horizontal blinds but allows continuous loops with tension devices for all other window covering types. According to Nien Made, this proposal addresses 95 percent of the products, an estimate that is based on Nien Made's own figures.

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 CPSC In-Depth Investigation File. Date range of reported incidents: January 1996 through December 2016. Note that further reporting of incidents for this time period can change the percentages.

Staff's assessment of the incidents reported to CPSC shows that 53 percent of the incidents involved horizontal blinds.³ About 27 percent of the incidents involved continuous loops that are not on a horizontal blind. Staff notes that, in only one incident, a tension device that is compliant with the current standard was found attached on the cord. Staff cannot determine the effectiveness of this proposal, given the lack of information on the number of window coverings that have compliant tension devices removed from the product altogether during or after installation or the number of window coverings that are used with tension devices not attached to a fixed surface. Staff notes that if the tension device is completely removed from the product, the window covering typically becomes fully operational.

- *Consumer advocates' proposal:* Products that are 18-72 inches wide and up to a maximum 72 inches long are required to meet one of the following conditions: no cords, no accessible cords, free-standing or tensioned cords with a maximum of 12 inches in length, retractable cords with a rigid handle that is at least 12 inches long, or continuous loops with either a rigid enclosure or an integrated tensioner. Staff was able to identify the product or window size in about 50 percent of the incidents.⁴ If we assume that the same percentages apply to unknown sized window coverings, staff estimates that more than 90 percent of the incidents would be addressed with this proposal.

Based on the available information, the consumer advocates' proposal would be the most beneficial proposal for child safety because staff estimates that this proposal would address the highest percentage of incidents. If the WCMA's current proposal is the one that is chosen for balloting, CPSC staff encourages WCMA to establish a timeline to expand the scope of the standard to address the remaining hazards in custom products. CPSC staff remains committed to working with the Association and all stakeholders to finalize a revised voluntary standard that will significantly reduce the deaths and injuries associated with corded window coverings. If you have any questions or comments, please feel free to contact me.

Sincerely,



Rana Balci-Sinha

Window Coverings Project Manager

³ Ibid.

⁴ Ibid. In some cases, staff used the window width and length where window covering size was not available but window size was available.