



U.S. CONSUMER PRODUCT SAFETY COMMISSION
5 Research Place, Rockville, MD 20850

July 13, 2017

TRANSMITTED VIA EMAIL

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 appreciates the opportunity to comment on the Window Covering Manufacturers Association (WCMA) ballot, dated May 31, 2017, on the revision of the American National Standard for *Safety of Corded Window Covering Products (ANSI/WCMA A100-2014)*¹. Staff applauds the extensive effort made by manufacturers, retailers, consumer advocates, test labs, and other stakeholders in the development of this major revision of the standard. Staff believes that the draft standard offers a large improvement over the current standard in addressing the strangulation hazard by incorporating effective performance requirements for stock products.

CPSC staff is not voting on the ballot, but we are providing comments, as described below.

• ***Substantive Comments:***

- *Add a definition and performance requirements for rigid cord shroud:* Draft standard defines a “cord shroud” as “a device or material added to limit the accessibility of a cord.” Under the draft standard, one of the compliance paths for stock products is to have inaccessible cords that can be achieved with a *rigid* cord shroud. However, the draft standard does not include a definition for “*rigid*” and lacks requirements to ensure the rigidity of the shroud. Staff believes that the rigid cord shroud should have a definition and performance requirements to ensure that the shroud cannot be wrapped around a child’s neck or won’t form a u-shape as a result of attaching the free end of the shroud to the wall (which could then allow a child to position

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.

his/her head over the shroud from ear to ear.) Furthermore, staff recommends adding a sentence to section 4.3.1.3.1 to ensure that only rigid cord shrouds are allowed for operating cords. Sample wording is shown below (added text is shown with an underline):

4.3.1.3.1 The Operating Cords shall be inaccessible as determined per the test requirements in Appendix C: Test Procedure for Accessible Cords. If cord shroud is used to make the operating cords inaccessible, cord shroud shall be a rigid cord shroud that meets the requirements of 6.X and 6.3.

- Add a section 6.X to include the rigidity performance requirements for a rigid cord shroud.
- Add a definition for “rigid cord shroud” in Section 3, number it 2.23, and renumber the rest of the definitions in Section 3. Add a drawing for rigid cord shroud in Appendix H.
- ***Staff supports the following changes that were made to the Definitions section of the draft standard per the email received from WCMA on July 5, 2017:***
 - Add a definition for “inaccessible operating cords” as follows, and number it 2.13 in Section 3: Operating cords that are inaccessible, as determined per the test requirements in Appendix C: Test Procedure for Accessible Cords.
 - At the end of the definition of “Operating Cord” in 2.18 in Section 3, add “Operating includes, but is not limited to, lifting, lowering, tilting, rotating, and traversing.”
 - Revise 5.02 “Stock Blinds, Shades, and Shadings” definition in Section 3, as follows:
 - “Stock Blinds, Shades, and Shadings”: A specific stock keeping unit or SKU, which is completely or substantially fabricated (as defined below) in advance of being distributed in commerce (as that term is defined in 15 U.S.C. § 2052(a)(7)) and in advance of any specific consumer request for that product. The SKU can either be sold “as is,” or modified or adjusted by the seller, manufacturer, or distributor before or after being distributed in commerce, and it would still be considered a stock blind, shade or shading product.
 - “Substantially fabricated” would include products pre-assembled in advance of a consumer order or purchase. Pre-assembled products that are modified or adjusted by the seller, manufacturer, or distributor before or after being distributed in commerce will still be considered as “substantially fabricated,” if they require, but are not limited to, any of the following: adjustments to size, attachment of the top rail and/or bottom rail, and/or tying of cords to secure the bottom rail to finish the assembly of the product.
 - Stock Blinds, Shades, and Shadings shall not be considered “Custom Blinds, Shades, and Shadings” solely because of the method of

distribution (*e.g.*, Internet sales) or the size of the purchasing order (*e.g.*, for multi-family housing developments).”

- Revise “Operating Systems, Cordless” definition in 4.04, as follows: An operating system that does not require an operating cord, or whose operating cord is inaccessible, as defined in 2.13. A cordless product may still have accessible inner cords.

- **Editorial Comments**

- Add “readily distinguishable” before “name” in 5.4.1.
- Add “month and” before “year” in 5.4.2.
- In Section 3 Definitions, in the “Definition” column, there should be consistency in capitalizing the first letter of the first word throughout, and there should be consistency in using a period at the end of the text throughout. In addition, defined terms used within other definitions should be capitalized.
- Horizontal is misspelled in the definition of “Traverse Rod” in 1.07.
- Bottom rail should be separated in the definition of “Short Cord” in 2.19.
- For 5.1.3 Labels for Merchandising for Custom Corded Products, add, “but is not limited to,” between “which includes” and “the sample book” in the first sentence.
- Use the Spanish translation of the word STRANGLE in the Spanish warning tag in Section 5.2.3 Roll-Up Style Shade.
- Change Roll-Up Style Shade to Roll-Up Style Blind in 5.2.3 because Roll-Up Style Shade is not defined in Section 3.

Even though it is not specifically related to the ballot, CPSC staff urges WCMA to explore avenues to inform and educate multifamily housing managers so that they install only window covering products that meet the requirements for stock products. Given that the occupants of these units are unknown and may include children, staff believes it would be prudent to install the safest products in these residences. In addition, staff encourages WCMA to follow through on the proposal it made during the WCMA Steering Committee meeting on March 16, 2017 to work with stakeholders to pursue legislation that prohibits or strictly limits the installation of corded window coverings in multifamily housing.

Although staff believes that the warning labels with the improved pictogram should improve the hazard communication for custom products, staff believes the WCMA steering committee should continue the momentum from the development of this draft standard and

Mr. Ralph Vasami

Page 4

address the remaining hazards associated with custom products, by establishing a task group by the end of 2017, per the timeline outlined at the WCMA Steering Committee meeting on March 16, 2017. Staff remains committed to working with WCMA and stakeholders to further revise the standard and believes that this group needs to focus on the accessible operating cord that could pose a hazard in custom products. Thank you for this opportunity to comment. If you have any questions or comments, please feel free to contact me.

Sincerely,

A handwritten signature in grey ink, appearing to read 'Rana Balci-Sinha', with a stylized flourish at the end.

Rana Balci-Sinha, Ph.D.
Window Coverings Project Manager