



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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TRANSMITTED VIA EMAIL

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 provide our recommendations for WCMA Steering Committee's consideration to improve the safety of corded window covering products.¹ We believe that substantial improvements have been made to the latest version of the American National Standard for *Safety of Corded Window Covering Products (ANSI/WCMA A100-2018)* (2018 standard), particularly in the area of "stock" products. However, expanding the requirements to all corded window coverings up to a certain size will improve window covering safety. Based on the staff's letter on February 7, 2017, we suggest the following changes to the 2018 standard:

- (1) Replace "Stock Blinds, Shades, and Shadings" in Section 4.3.1 with the following text:
"If the window covering (1) can be raised and lowered to function, and measures at least 18 inches in width and up to and including 72 inches in length, or (2) traverses (moves in horizontal direction) at any size, the following operating systems shall be utilized for both stock and custom products."
- (2) Replace "Custom Blinds, Shades, and Shadings" in Section 4.3.2 with the following text:
"If the window covering can be raised and lowered to function and measures either (1) less than 18 inches in width at any length, or (2) at least 18 inches in width, but over 72 inches in length, the following operating systems shall be utilized for custom products only."
- (3) In section 5.3.3, add the following text to the beginning:
"For products that are included in section 4.3.2,"

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.

In the same section, remove the words “or “Stock,” “or an “S,” and “or the word “Stock,” respectively.”

- (4) Replace Section 6.5 with the language that was finalized by the task group on Cord and Bead Chain Restraining Device and sent in your 11/25/2018 email to the task group.
- (5) Replace Section 6.6 with the language that was finalized by the task group on Rigid Cord Shroud and sent in your 11/25/2018 email to the task group.
- (6) In the Appendix, clarify whether Standard applies to curtain and drapery products.
- (7) Provide a rationale for why the following sentences were added to Sections 4.3.1 and 4.3.2: “Where more than one method is utilized, at least one shall meet the applicable requirement in Section 6.”

We encourage WCMA to promptly reopen the standard, discuss the CPSC’s recommendations, finalize the language, and issue a ballot as soon as possible. We are optimistic that WCMA remains motivated to address the remaining strangulation hazards.

If you have any questions or comments, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Rana Balci-Sinha". The signature is stylized and somewhat cursive, with a large initial "R" and "B".

Rana Balci-Sinha, Ph.D.

Window Coverings Project Manager