



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

July 22, 2014

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 considers window covering strangulations one of the top five home hidden hazards. Staff is aware of 285 incidents (184 fatal strangulation and 101 near-miss strangulations) from 1996 to 2012, of young children entangled in window blind cords.¹ Of the 285 total reported incidents involving window covering cords, CPSC field staff completed follow-up In-Depth Investigations (IDIs) for 249 incidents.² CPSC technical staff's review of these incidents revealed that free-hanging pull cords, commonly used to operate horizontal blinds, and continuous loop cords, commonly used to operate vertical blinds, are the predominant types of cords in which children have become entangled.³

In the CPSC's February 2012 comment letter⁴ for the draft proposed standard, which then became the ANSI/WCMA A100.1-2012 standard, CPSC technical staff stated its concerns about the language of certain provisions of the draft proposed standard, particularly the provisions that address pull cords and continuous loops. CPSC technical staff continues to urge the ANSI/WCMA voluntary standard committee to consider comprehensive and immediate incorporation of the requirements that will effectively reduce or eliminate the risks associated with potentially hazardous cords and loops. This letter describes CPSC technical staff's concerns with ANSI/WCMA A100.1-2012, American National Standard for Safety of Corded Window Covering Products, and the recommended revisions to the standard.

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 The Window Coverings Manufacturers Association (WCMA) has received copies of these 249 IDIs from CPSC. In addition, WCMA received copies of 11 IDIs involving incidents that occurred in 2013 and 2014. However, CPSC technical staff's review does not include these incidents. The source of these incident reports are CPSC Injury and Potential Injury Incident file (IPII), Death Certificate File (DTIS), and In-Depth Investigations (INDP).

³ The number of incidents associated with pull cords is 101 (90 are horizontal blind incidents), and the number of continuous loop incidents are 70, of which 41 are linked to vertical blinds.

⁴ http://www.cpsc.gov/PageFiles/115044/wcma02_06_12.pdf.

Strangulation in Pull Cords

The sections 4.3.2, 4.3.3, 4.3.5, and 4.3.9 of the current version of the standard allow products to be designed and manufactured with accessible operating cords that can be wrapped around the neck of a child or be knotted or tangled to create a hazardous loop or form a hazardous loop when the window covering is raised. Technical staff strongly recommends that these sections be deleted from the standard and replaced with a performance standard to limit the length of an accessible operating cord to 8 inches.⁵ CPSC technical staff's proposed changes are shown in the Appendix to this letter. These proposed performance standards would ensure that there are no accessible operating cords on the product that can form a hazardous loop under any condition of foreseeable use or misuse. CPSC staff believes these changes will save lives.

Strangulation in Continuous Loop Products

Staff recognizes that tension devices, when they are properly installed and intact, keep the looped cords taut and do not allow a child's head to enter into the loop. If tension devices are not installed, are installed improperly, or are removed from the cord, a hazardous loop is present. CPSC technical staff's IDI review shows that a total of 70 strangulations or near-strangulations occurred in products in which the tension device was not installed or was broken. The following section in the ANSI/WCMA standard allows window coverings to be operated (at least partially) when the tension device is not installed:

- 6.5.2 The tension device in conjunction with the product shall be designed so when not properly installed will, at least partially, prevent the window covering from functioning for light control or privacy.

Staff is concerned that consumers may, and do, easily defeat or remove the tension device completely to allow the window covering to function and expose a hazardous loop. Therefore, the current requirements do not appear to address adequately the risks associated with looped cords.

CPSC technical staff recommends modifying section 6.5.2 to remove the "at least partially" clause. This requirement will ensure that the window covering cannot be operated *at all*, unless the tension device is installed. This change would potentially save lives. The proposed language is shown in the Appendix.

CPSC Technical Staff Position on Cord Cleats

Finally, we would like to make clear our position on the use of a cord cleat as a safety device. Staff does not believe that cord cleats are an effective means of mitigating the pull cord hazard because staff predicts that the likelihood of installing and using cord cleats is low. Research shows the rate of compliance with warnings is lower when the effort needed to comply with the

⁵ The neck circumference of a fifth percentile 6-9 month old child is 8 inches. (Norris, B. & Wilson, J.R. (1995). *CHILDATA: The Handbook of Child Measurements and Capabilities - Data for Design Safety*. London, UK: Consumer Safety Unit, Department of Trade and Industry.)

warning is higher.⁶ For example, as more steps are required to install and use safety devices, or as the steps become more difficult to follow, it is less likely that consumers will make the effort needed to comply with the requirement. Consumers will need a screwdriver or a drill to make a permanent hole in the wall or window frame to install the cord cleat. Thereafter, once the cleat is installed, the consumer must wind, unwind, and rewind the cords each time the blinds need to be raised and lowered. The more time the consumer uses the cleat with the blinds with no observed interaction between a child and the blinds, the “safer” the consumer feels. Failure to wrap the cord around the cleat can result in a potentially hazardous situation (see IDI 110103CCC3322, in which the child reached the cord that is usually wrapped around the cord cleat, but was not wrapped around the cleat on the day of the incident.) In addition, cleats have to be installed high up to reduce the child’s access (see IDI 050407CCC3309). For these reasons, technical staff believes that reliance on the installation and use of cord cleats will very likely not effectively address the risks associated with pull cords.

Conclusion

CPSC technical staff looks forward to continuing to work with WCMA to make these important, lifesaving changes as quickly as possible to the ANSI/WCMA voluntary standard to address deaths and injuries associated with corded window coverings. Technical staff is aware of innovative technologies currently in the market that have the potential to reduce or eliminate the risks associated with the majority of the corded window coverings about which staff is concerned. Technical staff encourages an open and comprehensive, rather than sequential, standards development process that includes different manufacturers and other interested parties in developing requirements that will drive the development of new ideas and concepts to make the transition to safer window coverings occur more quickly. If you have any questions or comments, please feel free to contact me.

Sincerely,



George A. Borlase, Ph.D., P.E.
Assistant Executive Director
Hazard Identification and Reduction

⁶ DeJoy, D.M., (1999). Attitudes and Beliefs. In M. S. Wogalter, D. M. DeJoy, & K. R. Laughery (Eds.), *Warnings and risk communication* (pp. 189–219). Philadelphia: Taylor & Francis.

Appendix: CPSC Technical Staff Suggested Changes to ANSI/WCMA A100.1-2012

CPSC technical staff recommends that the following changes be made to section 4.3:

4.3.1 The product shall have no operating cords which are accessible, as determined per the test requirements in Appendix C: Test Procedure for Accessible Cords.

4.3.2 ~~The product shall have one or more separate operating cords.~~ The product shall have one or more accessible operating cords with a maximum length of 8 inches in any position of the window covering.

~~4.3.3 The product shall contain a cord release device in the loop or the head rail that meets the requirements in 6.1.~~

4.3.4 The product shall contain a permanently attached cord retraction device that meets the requirements of 6.2. The portion of the cord that is not retracted shall not exceed 8 inches in length.

~~4.3.5 The product shall contain a cord shear device that meets the requirements in 6.3.~~

4.3.6 The product shall contain a cord shroud device that meets the requirements of 6.4. The cord shroud will be rigid if it is intended to cover the operating cords.

4.3.7 The product shall contain a cord tension device that meets the requirements of 6.5.

4.3.8 The product shall contain a loop cord or bead chain restraining device that meets the requirements of 6.6.

~~4.3.9 The product shall, if it requires a cord connector, limit the exposed loop above the cord connector to less than 3 in (76 mm) below the bottom of the cord lock when only the bottom rail is in the fully lowered position, and shall include a warning on the product that describes the potential hazard when the product is in the raised position.~~

CPSC technical staff recommends that the following changes be made to section 6.5.2:

6.5.2 The tension device in conjunction with the product shall be designed so that when it is not properly installed, it will, at least partially, prevent the window covering from functioning for light control or privacy.