



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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August 17, 2010

Mr. Ralph Vasami
Executive Director
Window Covering Manufacturers Association
355 Lexington Avenue
New York, NY 10017

Dear Mr. Vasami:

The U.S. Consumer Product Safety Commission (CPSC) staff appreciates the opportunity to comment on the Window Covering Manufacturers Association (WCMA) ballot on the Second Provisional American National Standard for *Safety of Corded Window Covering Products*. In accordance with CPSC policy, the CPSC staff is not voting on the ballot, but is providing comments as noted in this letter.*

CPSC staff believes that the new proposed requirements will result in substantially safer Roman shades for consumers. Although the staff believes that further improvements are needed to address strangulation risks in all shades, we are pleased that WCMA is moving forward now to address the hazards associated with Roman shades.

CPSC staff has the following comments, which could be addressed immediately in the proposed version of the standard and that should result in safer Roman shades:

- All references to “rear cords” should be changed to “lift cords” to include Roman shades designed with cords located on the front.
- In Appendix C, if ASTM finger probe B is used, it should be fully extended.
- In Figure D1, the radius of the head probe should be specified.
- Regarding Appendix D2.2, substantially wide lift cords would not allow a child’s head to pass through the lifting material (cord, fabric, etc.) and would not allow the lifting material to

* This letter was prepared by the CPSC staff; it has not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

be positioned around the child's neck. Further, such a wide lifting material would reduce the possibility that the child could pull the material and bunch it up creating a loop through which a child's head could pass. Staff suggests that further evaluation be performed to either determine a maximum distance that the head probe should be inserted, using an insertion force of 10 lbs or less, or define a certain width of lifting material that would not allow passage of a child's head (shades meeting this width requirement would not need to be tested with the head probe).

CPSC staff believes that the proposed standard provides increased safety of Roman shade products compared to the current version. However, as was stated in the June 15, 2010 trilateral letter to the standards development organizations in North America and Europe, CPSC staff believes that all strangulation risks associated with corded window coverings, such as those associated with operating cords and looped bead chains or nylon cords, should be swiftly eliminated in a further revision to the proposed standard.

Sincerely,

A handwritten signature in black ink, appearing to read "Rana Balci-Sinha". The signature is stylized with a large, circular flourish at the end.

Rana Balci-Sinha