



WINDOW COVERING
MANUFACTURERS
ASSOCIATION

August 29, 2014

George A. Borlase, Ph.D., P.E.
Assistant Executive Director for Hazard Identification and Reduction
U.S. Consumer Product Safety Commission
4330 East-West Highway
Bethesda, MD 20814

Dear Mr. Borlase,

Thank you for your letter dated July 22, 2014 regarding the ANSI/WCMA A100.1-2012 standard. We greatly appreciate your comments and input.

The Window Covering Manufacturers Association (WCMA) and its members believe that increasing the level of cooperation between the CPSC and industry will greatly assist the industry in its efforts to improve safety and reduce incidents on window coverings.

I recently met with our membership to begin the process of opening the ANSI/WCMA window covering standard with the goal of further minimizing the risk from cords that can form a hazardous loop. As I stated to you in our meeting, WCMA and its members are committed to the goal of minimizing the risk of its products and we are prepared to discuss any and all proposals. This process will be fair and thorough and include input from a wide variety of stakeholders.

WCMA will consider the information contained in your July 22 letter as the first comments and recommendations for revising the 2012 standard. Let me also provide you with some initial responses to your letter based off my meetings with WCMA members.

- **Strangulation in Pull Cords** – We are in agreement that any changes to the safety standard should be focused on further minimizing the risk to young children through a performance-based standard – i.e. one that identifies an objective with the criteria stated for achieving the objective. As you know, the current ANSI/WCMA A100.1-2012 standard is a performance standard, allowing innovation and providing the producer a variety of ways to achieve compliance. We have previously discussed with you and your colleagues the issue of the technological feasibility of limiting the operating cord to eight

inches and its impracticality as a solution so we will not restate the substance of those discussions here. However, we will analyze additional proposed solutions to the potential risk to young children from accessible operating cords. Accessible operating cords that can form a hazardous loop and other issues will be reviewed as part of the standard-setting process and WCMA looks forward to further dialogue with CPSC on this issue.

- **Tension Devices** – We appreciate the staff’s comments on tension devices and their recommendation that the standard be modified to ensure that window coverings cannot be operated at all unless the tension device is properly installed. As you may know, the tension device language in the current standard that requires the window covering product to be at least partially inoperable if not properly installed was developed as a compromise due to the CPSC’s previous opposition to these devices. Many member companies report that they reassigned resources to focus on the development of alternative safety technology to address the issue because CPSC staff made it clear they did not support the use of such a device. With the recommendation regarding tension devices in your letter, this provision will once again be analyzed in an effort to make the product completely inoperable if the tension device is not installed properly.
- **Cord Cleats** - As I previously mentioned, the opening of the standard will be done simultaneously with implementing an expedited approval process to add cord cleats to the window covering standard. This is required to harmonize the standard with the latest revision of the Canadian standard (CAN/CSA Z600 window covering standard). We appreciate the staff’s concerns that cord cleats do not provide a permanent solution to mitigate the risk of strangulation. However, the latest Canadian, European Union, United Kingdom and Australian window covering safety standards all include the use of cord cleats to mitigate risk. Consumers already need a screwdriver and a drill to make a permanent hole in the wall or window frame in order to install stock window covering products. Installing the cleat will be relatively simple compared to the steps that are required to install window coverings such as securing the head rail to the wall. I want to be clear that the industry does not believe that cleats on their own are a permanent solution to the strangulation hazard of operating cords, nor will they somehow slow the innovation that several of the Commissioners have seen first-hand during their visits to member companies. The industry is and will continue to innovate and produce the safest products possible; however, WCMA and its member companies also believe that cleats can help reduce incidents -- particularly on pre-standard products -- similar to the use of the hundreds of thousands of free retrofit kits that have been distributed via the Window Covering Safety Council (WCSC) to retrofit older and recalled products.

WCMA will be conducting additional research regarding the use of cord cleats and will share this data with CPSC as soon as it is available.

Conclusion

WCMA and its members look forward to continuing to work with CPSC on revising the safety standard as well as strengthening cooperation on a nationwide public education campaign to educate the public about the risks associated with older models of corded window coverings. We will be communicating with CPSC's public affairs office regarding the agency's participation in Window Covering Safety Month in October including ideas for joint cooperation.

WCMA and its members are committed to working with CPSC to find ways to further reduce the risks associated with corded window coverings. It is our member companies who are driving innovation and producing new technologies to further minimize the risk associated with these products. As with the 2012 safety standard, the process for revising the standard will be open and comprehensive and will include a variety of stakeholders and interested parties.

We look forward to continued cooperation with CPSC based on open and direct communication. By working together, we can ensure a successful outcome to the standards-setting process and to our mutual goal of further minimizing the risk to young children from corded window covering products.

Sincerely,



Ralph Vasami
Executive Director
Window Covering Manufacturers Association

cc: Marc Schoem