

U.S. Consumer Product Safety Commission

Log of Meeting

SUBJECT: WCMA Rigid Cord Shroud Task Group Meeting

DATE OF MEETING: March 23, 2018

LOCATION: Teleconference

LOG ENTRY SOURCE: Rana Balci-Sinha

DATE OF LOG ENTRY: March 26, 2018

CPSC ATTENDEES: Rana Balci-Sinha, Howard Tarnoff

NON-CPSC ATTENDEES: Contact WCMA for the list of attendees

SUMMARY OF MEETING:

Task group (TG) chair Derick Marsh convened the meeting. Ralph Vasami, WCMA Executive Director, stated that the rigid cord shroud activity is the beginning of the work for future revision of the WCMA/ANSI standard and the group members could change for other issues including custom product requirements. Derick Marsh said that the cord shroud is defined in the standard (section 2.09) as to "limit accessibility of a cord." He said that a rigid cord shroud becomes a restraining device if a hazardous loop cannot be formed. Therefore, he proposed to compare requirements and test procedures for cord shroud and cord & bead chain restraining device with the objective of potentially combining the two definitions. The term "rigid" still needs to be defined and Mr. Marsh will talk to various TG members separately to draft a language for "rigid". Linda Kaiser, Parents Window Blind Safety, suggested the definition to include "cannot fold"; Jeff Sendlak, BV, suggested to review tilt cords that are used in horizontal blinds to adjust the tilt angle of slats and measure the amount of bending around a head probe while applying a certain amount of force. Next meeting is scheduled for 4/11/18 via teleconference. Mr. Marsh will work on comparing the test requirements including the order of tests for cord shroud and restraining device for the next meeting (the issue of limited size of the UV chamber to test long shrouds or restraining devices came up.) An in-person meeting is likely to be held in May 2018.



WINDOW COVERING
MANUFACTURERS
ASSOCIATION

To: Rigid Shroud Task Group
From: Derick Marsh, Chairman
Date: April 5, 2018
Regarding: Minutes of the March 23rd 2018 Rigid Shroud Task Group Meeting

The Rigid Shroud Task Group met by conference call on March 23, 2018. In attendance were:

Ralph Vasami	Joe Jankoski	Linda Kaiser	Howard Tarnoff
Jacquelyn Weber	Rana Balci-Sinha	Edward Krenik	John Lee
Paul Nathanson	Renato Ottaviani	Jeff Sendlak	Jim Anthony
Richard Gottuso	Tom Merker	William Lynch	
Michael Twomey, Esq.			

The Group reviewed the following key items relating to a Rigid Cord Shroud (as defined in the new Standard):

Overall objective:

Provide clarification for a compliance path that allows a manufacturer or seller of a window covering to cover or shroud the operating cord with a stiff or rigid device (not flexible enough to allow for wrapping around a neck or forming a hazardous loop) that allows operation of the shade or blind but does not allow the user to touch or access the cord or, if accessible, that the accessible cord cannot form a hazardous loop or wrap around hazard. This allows the continued use of longer cords, looped or not, and the benefits of continued use of operating systems like clutches or even cord lock that are not yet easily replaced by different operating systems (whether due to window height, shade or blind weight, cost, etc.).

Relevant Definitions to Consider

Rigid Cord Shroud: The current Standard creates a compliance path around a “Rigid Cord Shroud” but did not establish detailed requirements for what constitutes “Rigid.” There was a consensus that “rigid” meant that the device itself would not become a wrap-around hazard or deflect sufficiently to make a cord or bead chain loop accessible and therefore allow creation of a hazardous loop or wrap-around hazard. Derick Marsh agreed to return to the Group with some suggested testing techniques for

what constitutes "Rigid;" however, this will be driven in large part by which direction the Group decides to go on the question of limited accessibility.

Limit: The current Standard states that a Cord Shroud (rigid or not) is designed to "limit" access to cords without defining what "limit" means (i.e., accessible or not accessible). The Task Group will need to develop a definition of "limited" access in this context. Based on discussion among the Task Group members, there was less concern about whether a cord or bead chain could be accessed than about whether it could form a hazardous loop. It was agreed that if the cord or bead chain is not accessible, then the device that prevented access was not relevant under the Standard. The cord or bead chain is simply "inaccessible" and therefore the product is in compliance.

Cord or Bead Chain Restraining Device. The current Standard has a detailed definition and related testing standards for a Cord or Bead Chain Restraining Device. The primary difference between a Cord or Bead Chain Restraining Device and a Rigid Cord Shroud appears to be accessibility of the cord or bead chain, i.e., a restraining device allows for access and the shroud "limits" access. If the Group determines that "limited" access means that the cord or bead chain is accessible, as defined, then a Rigid Cord Shroud becomes a Cord or Bead Chain Restraining Device under the Standard.

The Group discussed the import of the foregoing observations and whether the concept of a Rigid Cord Shroud should be dealt with in a different way than is currently the case in the Standard since: (1) if the cord or bead chain is not accessible, then it already meets the Standard's compliance path for inaccessible cords and bead chains; or (2) if the cord or bead is accessible, then a Rigid Cord Shroud is a type of Cord or Bead Chain Restraining Device, which has detailed and agreed testing requirements. The Group discussed the historical rationale behind adding a Rigid Cord Shroud concept, which was a relatively recent device available in the market that tended to cover all or virtually all the cord or bead chain, with the user operating a handle or other device that moved the cord or chain. In an effort to be as inclusive as possible and allow for as much innovation as possible in the development of child safe products, this compliance path was added with more limited definition and testing standards than is usual in the Standard due to time constraints.

The Group did not reach consensus on the appropriate treatment of this compliance path. Derick Marsh agreed to provide some more concrete suggestions for the Group to react to in the upcoming meeting.

Other Matters to Consider

Installation: The current Standard provides that the manufacturer install the Rigid Cord Shroud (and restraining device). Consensus among the Group was that a device designed to be installed in the field by someone other than the manufacturer (such as a retrofit device) was acceptable under the Standard and that this language was not

designed to restrict installation of safety devices onto existing, installed window coverings.

Testing: The current Standard has three main testing requirements specifically for Rigid Cord Shrouds – Durability, Impact and Longevity (cycle test). The current Standard also has two additional testing requirements for Cord Shrouds generally – UV stability and Hazardous Loop formation. The Group discussed the various types of testing that should be conducted and appeared to have consensus that there should be a wraparound test and a hazardous loop test in addition to the other tests named above. The tests should deflect, twist and fold the shroud in various directions to simulate potential abuse that could lead to the shrouded cord or bead chain coming loose. There was no consensus on the details of those tests and Derick Marsh will return to the Group with some suggestions for reaction and comment.