



U.S. CONSUMER PRODUCT SAFETY COMMISSION
5 Research Place, Rockville, MD 20850

Rana Balci-Sinha
Division Director, Human Factors
Directorate for Engineering Sciences

Tel: 301-987-2584
Email: rbalcisinha@cpsc.gov

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TRANSMITTED VIA EMAIL

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 appreciates the opportunity to provide input for scoping of the next revision of the American National Standard for *Safety of Corded Window Covering Products (ANSI/WCMA A100-2018)* (the Standard). ¹ Staff has the following recommendations, some of which were discussed during the WCMA Steering Committee teleconference held on March 12, 2019:

- (1) Consider segmenting custom window coverings by size and/or type, and applying the requirements for stock products to these segments of custom products.²
- (2) As an interim measure for all custom products, and for custom products that cannot meet stock product requirements, as suggested in (1) above, present to the customer cordless/short cords/inaccessible cords as the default for custom orders so that customers have to choose affirmatively a corded operating system during the ordering process. If a customer does attempt to switch to a corded operating system, a best practice could also include interrupting the ordering process with an alert informing the purchasers that the subject product has hazardous cords, and therefore, is not best for households that have children, or for households where children may be present.
- (3) Ballot the rigid cord shroud requirement that was finalized by the task group so that it can be part of the performance requirements of the standard as soon as possible.

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 CPSC staff's February 7, 2017 [letter](#) indicates potential effectiveness of a previous proposal based on size.

- (4) Clarify whether the Standard applies to curtain and drapery products. Stakeholders seem confused about the Standard's applicability to these products, especially if the products are not integrated with a cord traverse system, or if they are raised using ribbons.

In addition, as discussed in the last teleconference, for successful implementation of the current Standard, WCMA should affirmatively reach out to online sellers and develop a guidance document for online sellers. These actions would help ensure that (1) products offered on such websites comply with the Standard, particularly the cordless/short cord/inaccessible cord requirements for stock products; and (2) the website for corded products displays the appropriate warnings, which section 5.1.3 of the Standard requires. Furthermore, a best practice could also include interrupting the ordering process with an alert informing the purchasers that the subject product has hazardous cords, and therefore, is not best for households that have children, or for households where children may be present.

We encourage WCMA to solicit actively for ideas from the Steering Committee members before the upcoming re-opening of the Standard. Moreover, we also recommend that WCMA schedule at least one more scoping teleconference to discuss ideas such as these before the re-opening in June 2019.

Thank you for your efforts in promptly reopening the standard. We are optimistic that the drive to publish the last revision of the standard will continue 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', with a stylized flourish at the end.

Rana Balci-Sinha, Ph.D.
Window Coverings Project Manager