



UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814
COMMISSIONER PETER A. FELDMAN

**STATEMENT OF COMMISSIONER PETER A. FELDMAN
ON MANDATORY SAFETY STANDARD FOR OPERATING CORDS
ON CUSTOM WINDOW COVERINGS**

NOVEMBER 2, 2022

Today the U.S. Consumer Product Safety Commission (CPSC) promulgated a final rule establishing a mandatory safety standard for operating cords on custom window coverings, which will improve safety by reducing children's risk of strangulation. Moreover, today's action completes the work beginning with the [2014 petition](#) to develop a mandatory standard for all products, the Commission's 2015 [Advance Notice of Proposed Rulemaking](#), and the 2018 ANSI/WCMA revisions addressing hazards from operating cords in stock window coverings.

Based on the record before the Commission, including the long pendency of this proceeding, the severity of the hazard to children, and the fact that firms already comply with similar requirements for stock window coverings in the United States and all window coverings in Canada, I voted to approve this final rule.

Although I am concerned about the cost/benefit analysis underpinning this rulemaking, according to our statute, the Commission must consider only whether a final rule's costs bear a reasonable relationship to its benefits. In my view, given the unique circumstances surrounding this proceeding, including earlier revisions to the voluntary standard for custom products and industry's adherence to a substantially similar Canadian standard, the Commission has met this burden.

As discussed in the final rule, the Commission may have overstated costs. Industry already complies with the Canadian requirements, a standard they [also opposed](#). The benefits may be understated because of the methodology we employed and the bifurcated approach (stock versus custom) that industry requested. For these reasons, I believe the magnitude of the benefits are commensurate with the rule's costs. My conclusions here are limited to the record in this matter.

While I base my decision solely on the existing record, the historical context is important. In 2016, CPSC entered into an agreement to suspend Commission enforcement activity to protect consumers based on WCMA's commitment to expedite revision and implementation of the ANSI/WCMA voluntary standard. WCMA's initial agreement on custom products indicates that such requirements are reasonable. However, WCMA [did not complete](#) this work in good faith. WCMA's failure to act made the Commission's actions today appropriate and necessary.