



March 1, 2022

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 supports your efforts to improve the safety of window coverings by reopening the ANSI/WCMA A100.1 Standard for Safety of Window Covering Products.<sup>1</sup> We provide the following comments regarding the draft revisions to the standard shared with the Steering Committee on January 20, 2022, and discussed at the January 21 meeting. Staff also reviewed the subsequent revisions sent on February 25, 2022.

We support eliminating standard operating systems and cord loop lift operating systems for custom window coverings, which have already been removed for stock products in the 2018 version of the standard. However, as discussed below, we do not support the proposed requirements for continuous cord loop systems and we have concerns about the current requirements for single retractable cord lift systems.

### Continuous Cord Loop Systems

CPSC staff does not support keeping the continuous loop system as an option for custom products. In the January 21 meeting, I presented 11 fatal and nonfatal incidents involving a continuous loop system. These incidents show that consumers will continue to use the continuous loop system with the tension device detached from the wall or from the cord.

During the January 21 meeting, WCMA members stated the proposed wording will require full inoperability of the window covering if the tension device is not properly installed on the wall. WCMA members stated that the proposal would require tension devices to pinch or lock onto the cord if the tension device was not attached to the wall, and the device would eventually butt up against the headrail and prevent the further operation of the window covering.

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<sup>1</sup> The views or opinions expressed in this letter are solely those of the staff, and have not been reviewed or approved by, and do not necessarily represent the views of, the Commission.



CPSC staff disagrees that relying on the device to contact the headrail constitutes “full inoperability of the window covering” if the tension device is not installed or installed in a location that does not maintain Tension on the operating cords. Furthermore, staff points out the following specific example scenarios of how tension devices can be ineffective in addressing the strangulation hazard:

- (1) Consumers can manually slide the device away from the headrail and continue to operate the window covering. This would result in an exposed loop, which is considered the most hazardous type of window covering cord.<sup>2</sup>
- (2) Consumers or installers can remove the tension device with a sequential process or tools, which will then leave the free hanging, hazardous loop on the product for an unknown period of time. Given the long life of these products and the potential for multiple occupancies in homes where these products are installed, staff concludes it is reasonably foreseeable that this hazardous loop can pose a hazard to a child.
- (3) Staff is unclear how to determine whether a tension device is “installed in a location that does not maintain Tension on the operating cords.” A tension device can possibly provide some amount of tension to meet the proposed wording in the standard but still allow a child to insert their head in the continuous loop. For example, we are aware of at least one incident where the child was able to insert his head into a loop even though the tension device would have passed the proposed wording. The proposed definition of Tension (“The applicable, consistently applied force required to eliminate or prohibit the creation of a Hazardous Loop in any operating position”) is dependent on whether a hazardous loop can be created; staff is unclear how the amount of tension can be confirmed in all possible installation locations.
- (4) Even if the tension device is “properly” installed, factors outside the manufacturer's control, such as the type of wall/fixed surface and type of fasteners, can undermine the integrity of the tension device installation (including over time with repeated use), resulting in a hazardous detached tension device.

CPSC staff strongly urges the WCMA to reconsider allowing this system for custom window coverings, given the technological advancements in integral tensioners and rigid cord shrouds that make continuous loops inaccessible without depending on external installations. Furthermore, cordless technologies are advancing rapidly and are recognized as safe alternatives to corded systems.

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<sup>2</sup> See Directorate for Health Sciences Memorandum by Dr. Wanna-Nakamura in the staff briefing package for the Notice of Proposed Rulemaking for Operating Cords on Custom Window Coverings (NPR) (2021)



## Single Retractable Cord Lift Systems

As discussed in CPSC's January 7, 2022 Notice of Proposed Rulemaking for Operating Cords on Custom Window Coverings (NPR), single retractable cord lift systems allow a cord to be pulled at any length to operate the window covering and then retract to a shorter length when the user releases the cord.<sup>3</sup> Staff concludes that it is reasonably foreseeable that a child can wrap the cord around his/her neck because retractable cord lift systems with the extended cord would be long enough (greater than 8 inches), and the retraction force needed to sustain that length could be low enough for a child to manipulate and wrap the cord around his/her neck. The NPR requested comments to determine if additional requirements, such as a maximum exposed cord length, and a minimum pull force for a single retractable cord lift system, can address the strangulation hazard. In the absence of adequately addressing those issues, staff continues to have concerns that this hazard is not addressed.

We look forward to working with you and other stakeholders to promptly review the WCMA voluntary standard to revise requirements for custom window covering cords, like those for stock window coverings, to address the risk of strangulation to children.

If you have any questions or comments, please feel free to contact me.

Sincerely,

Rana Balci-Sinha

Division Director, Human Factors  
Directorate for Engineering Sciences

Cc: Jacqueline Campbell, Voluntary Standards Coordinator, U.S. CPSC

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<sup>3</sup> <https://www.regulations.gov/document/CPSC-2013-0028-1567>