



August 15, 2022

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 comment on the Window Covering Manufacturers Association (WCMA) ballot, dated July 15, 2022, on the revision of the American National Standard for *Safety of Corded Window Covering Products (ANSI/WCMA A100-2018)*.¹ Staff recognizes the efforts made by manufacturers, retailers, consumer organizations, test labs, and other stakeholders in the development of this revision of the standard. The draft standard improves the current standard in addressing the strangulation hazard associated with standard operating systems in custom products. However, CPSC staff is voting negative on the ballot, due to the remaining issues in the draft standard. Staff's recommendations are described below.

- *Remove Tension Device (section 4.4.2.5.1) from acceptable methods in 4.4.2.5 for Continuous Loop Operating System.* As staff indicated numerous times, and most recently in its letter of March 1, 2022, staff does not support these provisions for tension devices used with a continuous loop system as an option for custom products. To prevent the strangulation hazard to children, window coverings should be inherently free of accessible strangulation hazards, meaning not presenting a strangulation hazard as manufactured, and should not require any consumer intervention with the product to address the hazard. Incident data demonstrate that tension devices may come off the wall, may not be installed at all, or may not keep continuous loops taut enough to prevent incidents. As shown in the incident data, window coverings that inherently address the strangulation hazard, and do not rely on the consumer or a third party installer to install a safety device, are the most effective approach to addressing the strangulation hazard. To recap, below are various scenarios that can make the tension devices ineffective: (1) Incident data show that even when not installed or broken, consumers can still use the window covering by manually sliding the uninstalled or broken tension device away from the headrail and continue to operate the window covering without attaching the tension device on a fixed surface, leaving an accessible free hanging, hazardous loop. (2) Consumers or installers can remove the tension device, which will then leave the free hanging, hazardous loop on the product that is

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.

fully functional. (3) Because tension devices rely on a consumer or installer to install properly (versus the manufacturer), this creates a lack of clarity on who determines (e.g., test lab, manufacturer, or installer) whether a tension device maintains “Tension” (as defined in the standard) on the operating cord when properly installed. Moreover, staff observed that a head probe can be inserted into a continuous loop even when the window covering is operable as intended. (4) Even if the tension device is installed “properly,” 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 not to allow the proposal for tension devices used with accessible continuous loops as the only strangulation hazard-mitigation device for accessible continuous loops on custom window coverings, given the technological advancements and feasibility in cord or bead chain restraining devices that make accessible continuous loops non-hazardous, 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.

- *Revise the stroke length from 36 inches to 12 inches for Single Retractable Cord Lift Systems (6.1.2.)* Staff recommends that the stroke length be measured from the bottom of the headrail and allow only up to 12 inches of exposed cord under tension at any position. This would minimize the possibility for a child to climb up, and while pulling the retraction device, wrap the 36-inch long cord around their neck. Staff assesses that, depending on the height of the window covering, installation location, and the operating interface, a child may be able to wrap a cord around his/her neck if it is 3-foot long. For example, consider that a 5.5 ft long window covering is installed 2 feet from the floor in a room with 9 ft ceiling and the top of the window is 7.5 ft from the floor. The retraction device length is 40 percent of the length of the window covering, which is 2.2 ft. An average 4-year-old child (3.6 feet tall) can climb on a surface such as side table that is two feet above the floor, reach the retraction device with an average overhead reach of 4.13 ft, and pull the device to expose a 36-inch long cord; this allows about 13.2 inches within the child’s reach, which is more than sufficient to be wrapped around a child’s neck (neck circumference of a 3.5-4.5 year old child is 10.8 inches.) Staff notes the risk from a 36 inch stroke length allowance is higher for older children because older and taller children would have longer exposed cord to manipulate and wrap around their necks.
- *Reorder the testing in 6.4 Loop Cord and Bead Chain Restraining Device.* The 2018 standard requires that a sample of cord or bead chain restraining device first be subject to UV testing before completing the impact, durability, and hazardous loop tests. The draft version changes the test order and does not require that a sample be subject to UV testing prior to conducting durability and hazardous loop tests. In the revision, a UV-tested sample that is an “appropriately sized section” of the loop cord and bead chain restraining device is subject to the impact test only. Staff assesses that this reduces safety because the impact of UV exposure is no longer properly accounted for in the durability and hazardous loop tests, and only an “appropriately sized section”, which is not defined and may not be as safe as an entire device is being subjected to UV exposure. Less durable cord and bead chain restraining devices may result in accessible hazardous loops. Although staff supports the 2018 version for these tests, staff also recommends that to maintain safety, the standard

must continue to require performing the UV test before the operational cycle test. Furthermore, staff suggests adding a deflection test similar to requirements for rigid shrouds.

- *Reorder the testing in 6.5 Rigid Cord Shroud and use the sample, not a section of it, for UV exposure.* The 2018 standard requires that the rigid cord shroud first be subject to UV testing before completing the operational cycle and impact tests. This requirement addresses possible degradation of the cord shroud by UV exposure, which a window covering may be exposed to in service in a window. The draft version allows an “appropriately sized section” of the rigid cord shroud to be subject to UV testing, followed by an impact test; the operational cycle test is not conducted on a UV-exposed sample. Staff assesses that this reduces safety because the impact of UV exposure is not being considered for the operational cycle test, and only an “appropriately sized section”, which is not defined and may not be as safe as an entire rigid cord shroud exposed to UV light being used for the impact test. In reality, the entire device must be subject to UV light, to test appropriately for the possibility of degradation from UV exposure. Accordingly, the entire rigid cord shroud should be subject to impact and operational cycle tests after being exposed to UV lights. A rigid cord shroud that degrades in the sunlight is less likely to be durable over time, which can lead to breakage and increase the likelihood of hazardous cords becoming accessible. Staff also questions the wording and the table in 6.5.2.2, because two samples are subjected to the same tests separately, according to the table, although three samples with “appropriately sized sections” are mentioned in 6.5.2.2. Staff recommends that the provisions in the 2018 version be retained for these tests to maintain the level of safety for rigid cord shrouds.
- *Clarify the “applicable” batteries used in remote controls.* Section 4.3 states that applicable battery-powered remote control devices shall meet the requirements of ANSI/UL 4200A – Standard for Safety for Products Incorporating Button or Coin Cell Batteries of Lithium Technologies. Because the scope of the ANSI/UL 4200A is limited to lithium batteries, the scope of this requirement could be interpreted to include only lithium batteries, while the remote controls could also contain other types, such as alkaline and silver oxide batteries. Staff recommends clarifying the scope in section 4.3 to include remote controls containing all button and coin cell batteries to comply with ANSI/UL 4200A.

Staff remains committed to working with WCMA and stakeholders to improve the safety of corded window coverings. Thank you for this opportunity to comment. If you have any questions or comments, please feel free to contact me.

Sincerely,



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

cc: Jacqueline Campbell, CPSC Voluntary Standards Coordinator

**U.S. Consumer Product
Safety Commission**
4330 East-West Highway
Bethesda, MD 20814

**National Product Testing
& Evaluation Center**
5 Research Place
Rockville, MD 20850