



**WINDOW COVERING
MANUFACTURERS
ASSOCIATION**

August 12, 2019

Rana Balci-Sinha, Ph.D.
Division Director, Human Factors
Directorate of Engineering Sciences
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814

Dear Dr. Balci-Sinha,

I am writing in response to your letter dated May 16, 2019.

I apologize for the delay in responding to your letter. As you are aware, the Window Covering Manufacturers Association (WCMA) intended to begin the process of opening and further revising the American National Standard for Safety of Corded Window Covering Products (ANSI/WCMA A100-2018) in June 2019, specifically with a focus on custom products.

Unfortunately, WCMA has no choice but to put on hold the planned revision of the ANSI/WCMA Standard because of the Government of Canada's decision to publish its Corded Window Covering Products Regulation. The new Canadian regulation, published on May 1, 2019, would ban most window covering products that comply with the ANSI/WCMA Standard except for certain shutters and roller shades with a spring loaded operating system. In fact, stock products that do not have operating cords, but have inner cords that cannot form a hazardous loop, would not comply with the Canadian regulation because of the new regulated pull force applied to the inner cord. In addition, the force applied to the inner cord under the Canadian regulation is not applied to test for a hazardous loop; it is applied to determine the force required to raise the product, which is completely contrary to the hazard scenario and is causing considerable confusion within the U.S. and Canadian manufacturing sectors.

As you are well aware, the ANSI standard has utilized the Hazardous Loop Test to great effect since it was developed in 2010. This test requires a five pound force to create a loop from the inner cords. The Canadian regulation applies a force of approximately seven and one half pounds on the inner cords. However, rather than attempting to create a loop, it applies the force to raise the product. The vast majority of products on the market do not comply with this higher force requirement and therefore would not be compliant with the regulation, rendering even products

with cordless operating systems non-compliant. Even the recommendations on additional product requirements contained in your May 16 letter would not be allowed under the new Canadian regulation.

International labs used by WCMA members to test window covering products for safety have told WCMA and its members that they have no idea how to test products for the new Canadian regulation. Until WCMA and its member companies can obtain clarifications of the provisions contained in the Canadian regulation, determine whether products could be developed that could meet the regulation, and receive confirmation that products can be tested by third party testing labs, WCMA must put further revisions to the ANSI/WCMA Standard on hold.

The Canadian Government moved forward with its ill-conceived regulation despite ongoing efforts and warnings by the Canadian and U.S. window covering industries, retailers, suppliers and distributors that it was unworkable, not technologically feasible and would cause confusion in the Canadian market. WCMA requests that CPSC encourage the Canadian Government to harmonize its regulation with the ANSI/WCMA Standard, or, failing that, to work with the industry to more sensibly and practically interpret their new regulation so that a wide variety of safe and compliant products under the recent ANSI/WCMA standard won't be banned in Canada. A collaborative regulatory process could have addressed all concerns and avoided what appears to be an unworkable regulation in Canada that will now delay further revisions to the ANSI/WCMA Standard.

WCMA will still move forward with balloting the rigid shroud language for the standard that was developed and agreed upon by the technical working group so that it can be included as part of the standard.

Finally, WCMA is in the process of contacting online sellers of window covering products to provide guidance on the requirements of the ANSI/WCMA Standard, including compliance issues related to the appropriate required warnings. We will update you on this effort soon.

Regards,



Ralph Vasami
Executive Director
355 Lexington Ave, 17th Floor
New York, NY 10017
Email: rvasami@kellencompany.com / Tel. 212-297-2122

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The Honorable Ann Marie Buerkle, Acting Chairman
The Honorable Robert Adler, Commissioner
The Honorable Dana Baiocco, Commissioner
The Honorable Peter Feldman, Commissioner
The Honorable Elliot Kaye, Commissioner