

MEETING LOG

SUBJECT: ANSI/WCMA Window Coverings Meeting

FY 24 OP PLAN ENTRY: Window Coverings

DATE OF MEETING: 11/14/2023

LOCATION OF MEETING: Hybrid. In person: Bracewell, 2001 M Street, NW, Suite 900, Washington, DC.

CPSC STAFF FILING MEETING LOG: Rana Balci-Sinha

FILING DATE: 11/29/2023

CPSC ATTENDEE(S): Mark Bailey, Rana Balci-Sinha, Mary House, Alisa Hwang, Mark Kumagai.

Suad Wanna Nakamura, Michele Viterise

NON-CPSC ATTENDEE(S): Daniel Aiman (Springs Window Fashions), Isabelle Delaney (Bracewell LLP), Rich Gottuso (Hunter Douglas), Courtney Griffin (CFA), Trista Hamsmith (Reese's Purpose), Linda Kaiser (Parents for Window Blind Safety), Ed Krenik (Bracewell), Derick Marsh (Rollease Acmeda), Paul Nathanson (Bracewell LLP), Ed Krenik (Bracewell LLP), Paul Nathanson (Bracewell LLP), Dylan Pasiuk (Bracewell LLP), Dane Pedersen (Bracewell LLP), Dwight Stone (Miles & Stockbridge), Jeffrey Stout (Hunter Douglas), Ralph Vasami (WCMA)

Summary of Meeting:

Jeff Stout and Derick Marsh demonstrated a cord retractor device and a new tension device that meet the 2022 standard.

Cord Retractor Demonstration and Discussion:

- Derick Marsh reported that their research demonstrates that consumers prefer an 18-inch stroke length. An 18-inch stroke provides a comfortable pull length for consumers while Jeff Stout stated that the rationale for 36-inch stroke length is for consumer acceptance that provides an acceptable number of pulls to raise or lower the shade. A 12-inch stroke length would require too many pulls to lift the shade. Manufacturers stated that the stroke length can vary based on the size and weight of the shade while the maximum length cannot exceed 36 inches per the 2022 standard.
- Manufacturers are concerned that a shorter stroke length will decrease durability of the
 components due to the stress on the shade when the cord extended to the full stroke length,
 and that consumers will become frustrated with the number of pulls to raise or lower per window
 covering.
- Manufacturers stated that cord retractors can be used for most shades including large sizes and heavy weights.

Continuous Cord Loop (CCL) with Tension Device – Demonstration and Discussion:

Derick Marsh demonstrated a new tension device that attaches to the chain. The tension
device cannot be easily removed and the chain cannot be easily pulled when not under tension.
Mr. Marsh stated that the tension device is assembled onto the chain and would require a saw
to remove it. The 2022 standard requires manufacturers to use a continuous cord loop with the

- tension device permanently assembled to the loop. Mr. Marsh stated that the new tension device does not work with continuous nylon cord loops.
- In response to CPSC and consumer advocate concerns about consumers possibly requesting the installer to remove the tension device, both Jeff Stout and Derick Marsh stated that the installer has a legal obligation to install the safety device.
- Linda Kaiser raised the possibility that the consumer will order a replacement chain without a
 tension device, showing a chain she ordered online. Derick Marsh said that his company sells
 the complete clutch, chain, and tension device assembled together as one unit, and that it is
 unlikely that a consumer will find the exact replacement online without a tension device
 attached.
- WCMA members said that custom products ordered from home improvement stores offer installation and that DIY installation continues to decline.

Participants also discussed the following:

- Cord Shrouds: Linda Kaiser suggested that a rigid shroud should be offered to the consumer. From the discussion, it appears that the cord shroud as envisioned in CPSC's final rule is not like cord shrouds used in Canada. Derick Marsh said the cord shrouds offered in Canada can be easily removed by consumers and that the risk for continuous loops remains when the shroud is removed. Mr. Marsh also stated that in Canada the shroud may be enclosed in the box and not attached to the window covering. In some cases, the shroud covers the loop by leaving an 8-inch long exposed loop at the bottom, which makes the operation of the window covering cumbersome.
- Vertical Blinds: CPSC staff asked whether WCMA considered requiring vertical blinds to be
 operated without a continuous loop, because a wand can easily traverse the blinds. Members
 stated that consumers may have difficulty using a wand in some cases, for example, where
 access is limited to one side of the window covering or in the case of large furniture pieces that
 make it difficult to walk in front of the furniture with a wand.
- Cost: Jeff Stout and Derick Marsh said they will provide cost information to Mark Bailey outside
 of this meeting.
- Incident Data: There seemed to be a disagreement about the source of cord loops and how much of that hazard remains under the requirements of the existing voluntary standard. WCMA asked CPSC to share incident data with all members so that there is no confusion among stakeholders.

NEXT STEPS: CPSC will look into incident data sharing with members.