



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
4330 EAST WEST HIGHWAY  
BETHESDA, MD 20814

George A. Borlase, Ph.D., P.E.  
Assistant Executive Director for Hazard Identification and Reduction  
U.S. Consumer Product Safety Commission  
4330 East-West Highway  
Bethesda, MD 20814

Phone: (301) 504-7622  
email: gborlase@cpsc.gov

October 28, 2015

Mr. Ralph Vasami  
Executive Director  
Window Covering Manufacturers Association  
355 Lexington Avenue  
New York, NY 10017

Dear Mr. Vasami:

On May 27, 2015, engineers from member companies of the Window Covering Manufacturers Association (“WCMA”) participated in a public meeting with U.S. Consumer Product Safety Commission (“CPSC”) staff to discuss the technologies and associated challenges in making window coverings safer. Staff found the technical meeting valuable and urges WCMA promptly to reopen the ANSI/WCMA A100.1-2014 *American National Standard for Corded Window Covering Products* to develop revised performance requirements that will comprehensively address the strangulation hazard to children.<sup>1</sup> Despite your numerous assurances over the past 14 months “to begin the process of opening the ANSI/WCMA window covering standard with the goal of further minimizing the risk from cords that can form a hazardous loop,” including your letter dated August 29, 2014,<sup>2</sup> staff has yet to see any visible progress on reopening the standard. Staff believes that the development of a voluntary standard with a standards development organization willing to advance efforts to prevent the formation of hazardous loops and to reduce strangulation deaths and injuries would be the best way to address the safety concerns relating to corded window coverings.

CPSC staff would like to reiterate one clarification made during the technical meeting. My letter sent on July 22, 2014 stated that the length of an accessible operating cord should be limited to 8 inches in any position of the window covering, which is based on the neck circumference of a fifth percentile 6 to 9-month-old child.<sup>3</sup> Staff clarified at the technical meeting that this length

---

<sup>1</sup> American National Standard for Safety of Corded Window Covering Products, ANSI/WCMA A100.1-2014. New York, NY: Window Covering Manufacturers Association, Inc.

<sup>2</sup> [http://www.cpsc.gov/PageFiles/170642/WCMALettertoGBorlase8\\_29.pdf](http://www.cpsc.gov/PageFiles/170642/WCMALettertoGBorlase8_29.pdf)

<sup>3</sup> Norris, B. and Wilson, J. R. (1995) *CHILDATA: The Handbook of Child Measurements and Capabilities – Data for Design Safety*. London, UK: Consumer Safety Unit, Department of Trade and Industry.

recommendation is limited to accessible operating cords that are in a static condition, not while the user is pulling on the cord, and therefore, applying tension to the accessible operating cord to operate the window covering (e.g., raising or lowering).<sup>4</sup> Staff believes that pulling on a cord and simultaneously attempting to encircle the neck with the cord would be an unlikely scenario. The length of the accessible operating cord in the static condition should be measured across the operating range of the window covering, including the window covering fully raised, fully lowered, and at all points in between.

There appeared to be broad agreement that the May 27, 2015 public meeting that involved technical discussions among CPSC staff engineers and window coverings manufacturers' engineers was productive. Therefore, staff strongly encourages you to include in-person technical public meetings as part of your voluntary standards revision process because staff believes that would be the most productive way to facilitate discussions among all interested subcommittee members on the technical issues associated with window coverings.

While CPSC staff is continuing to develop a mandatory performance standard as directed by the Commission, staff also remains willing to develop an effective revised voluntary standard that will reduce the deaths and injuries associated with corded window coverings. Staff is offering to help initiate the voluntary standards revision process by hosting a window coverings voluntary standards meeting at the CPSC National Product Test and Evaluation Center in Rockville MD, and we suggest you hold the meeting no later than December 18, 2015.

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

Sincerely,



George A. Borlase

---

<sup>4</sup> The minimum amount of tension on the cord would need to be specified within the text of the standard.