



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

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

Dear Mr. Vasami:

The U.S. Consumer Product Safety Commission (CPSC) staff* is concerned that there continue to be deaths and injuries associated with Roman shade window covering products. Since 2005, CPSC staff is aware of 11 incidents associated with children becoming entangled in the inner cord of a Roman shade; three of these incidents resulted in deaths.¹ The Window Covering Manufacturers Association (WCMA) Technical Committee recently developed draft requirements for ANSI/WCMA A100.1 *American National Standard for Safety of Corded Window Covering Products* to address the hazards presented by the exposed inner cords on the back side of Roman shades. The draft proposed requirements are:

- 4.5 In addition to meeting 4.4, the inner cords of Roman style shades shall meet one of the following requirements:
 - 4.5.1 They shall not be accessible.
 - 4.5.2 If they are accessible, they shall incorporate a cord release device that prevents a free standing loop from forming.
 - 4.5.3 If they are accessible and do not incorporate a cord release device, all the following shall apply:
 - 4.5.3.1 The vertical ring to ring (or cord guide to guide) spacing should not be greater than 8 in. (204mm), and
 - 4.5.3.2 The cords on the side of the shade shall be 2 in. (51mm) or greater from the edge of the product, and

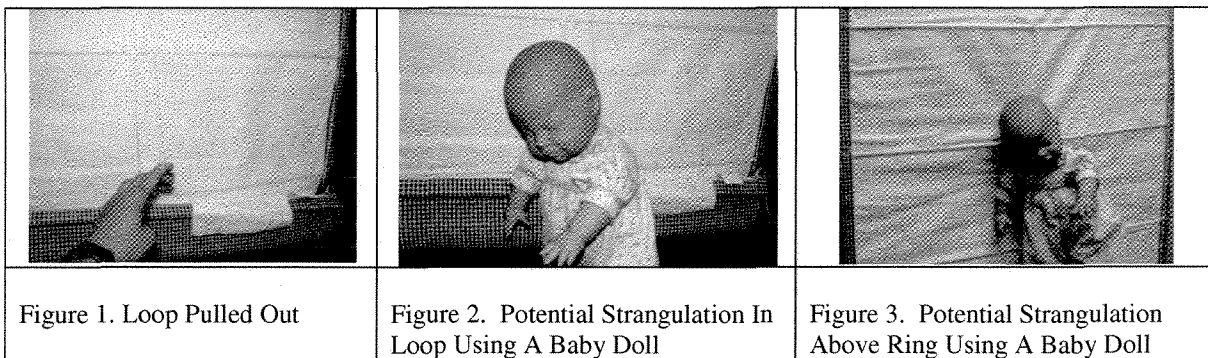
* This letter was prepared by CPSC staff, has not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

¹ In-Depth Investigation (IDI) reports: 050811CBB3454, 060308CBB1394, 081203CCC3170, 070719CCC2643 (fatal), 081203CCC1218, 081203CCC1221, 080423CCC1551, 080415CCC1535 (fatal), 080812CNE3675, 080729CCC3726, 090108CWE7977 (fatal)

- 4.5.3.3 The product shall include a bottom bar or hem of sufficient weight and rigidity to eliminate a free standing loop when the lift off cord is pulled and released from any point above the first ring/guide above the tie-off point.

CPSC staff has concerns regarding the adequacy of these requirements in addressing the potential strangulation hazard. An 8-inch minimum distance between the inner cord rings will not address the ability of a child to pull the inner cord out to form a loop or the ability of a child to place his or her neck between the inner cord and the shade fabric above the ring. CPSC staff recently evaluated a Roman shade product with a ring to ring distance of 8 inches and observed the following:

1. A strangulation hazard exists in the loop that can be formed by pulling out the inner cord as shown in Figures 1 and 2. The loop can be pulled out because the fabric rises and allows slack in the inner cord.
2. A strangulation hazard exists in the gap between the fabric and inner cord where the cord runs through a ring as shown in Figure 3. The cord is loose enough that a “J” can form across a child’s neck to cause a strangulation hazard.



CPSC staff does not believe that the requirement of Section 4.5.3.2 (minimum 2-inch distance between the outer inner cords and the edge of the shade) will be effective in preventing strangulation. The intention of this requirement is to reduce accessibility of the cord from the side of the shade, and the minimum distance is based on the width of a child’s hand. However, staff is aware of an incident (IDI report 080812CNE3675) in which a child accessed and became entangled in an inner cord that was 5 inches from the edge of the shade. Furthermore, children often play behind window coverings, so access to the inner cords on Roman shades should not be based solely on access to the cord from the side of the shade.

CPSC staff does not believe that the requirements of Section 4.5.3.3 (weighted bottom to prevent “freestanding loop”) will be effective in preventing strangulation because the inner cords on Roman shades are exposed and take little manipulation to become hazardous. Focusing on a free standing loop is appropriate on horizontal blinds because a hazardous loop can only form if a child pulls the inner cord out from between the slats. For Roman shades, the wide spacing between rings coupled with the loose tension in the inner cords allow a child to insert his or her

head between the inner cord and shade with enough of the cord across the child's neck to cause a strangulation hazard. This can happen whether or not a freestanding loop can form in the inner cord.

CPSC staff believes that the most effective way to reduce the hazards of exposed inner cords on Roman shades is to make the cords inaccessible. As an alternative, a cord release device that meets the modified requirements described below (Section 4.5.1.2), may also be effective. CPSC staff recommends that the requirements for the inner cords on Roman shades be limited to the following:

4.5.1 In addition to meeting 4.4, the inner cords of Roman style shades shall meet one of the following requirements:

4.5.1.1 They shall not be accessible.

4.5.1.2 If they are accessible, they shall incorporate a cord release device that releases (as referenced in Appendix A) at any portion of the inner cord where the test fixture of Figure A-1 can be inserted between the inner cord and the shade. The cord release device shall not introduce any additional strangulation or choking hazards when activated.

Thank you for this opportunity to comment. If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Caroleene Paul", with a stylized, cursive script.

Caroleene Paul

cc: Colin Church, CPSC Voluntary Standards Coordinator