

~~CPSC BRAND CALIFORNIA 08 05 001113~~  
4/30/08  
~~NO NEW PRODUCTS IDENTIFIED~~  
~~EXCEPTED BY: PETITION~~  
~~RULEMAKING ADMIN. PROC DG~~  
~~EXEMPTIONS REMOVED:~~

**U.S. Consumer Product Safety Commission  
Log of Meeting**

**SUBJECT:** WCMA Technical Meeting on window covering cords

**DATE OF MEETING:** March 27, 2008

**LOG ENTRY SOURCE:** Caroleene Paul C.P.

**DATE OF LOG ENTRY:** April 23, 2008

**LOCATION:** Georgia World Congress Center, Atlanta, GA

**CPSC ATTENDEE(S):** Caroleene Paul, ESME  
Rena Rauchschwalbe, Compliance

**NON-CPSC ATTENDEE(S):**

Tim Bennett	WCMA
Stephen Drew	Health Canada
Michael Daniels	Hunter Douglas
Joe Cannaverde	RollEase, Inc.
Patrick Foley	Levolor Kirsch
Joseph Kovach	Hunter Douglas
Tom Marusak	Comfortex
Rory McNeil	Techstyles
Tom Merker	Springs Window Fashions
John Morris	Springs Window Fashions
Chris Outlaw	Hunter Douglas

**SUMMARY OF MEETING:**

Tom Merker and John Morris called the meeting to order. Antitrust guidelines were reviewed and minutes of the February 21, 2008 and March 7, 2008 subcommittee and task group meetings were approved (attached).

Roman Shades

Caroleene Paul used a baby doll to demonstrate the strangulation hazard posed by exposed inner cords on the back of a sample Roman Shade. A discussion followed on the vast numbers of small "mom and pop" Roman Shade manufacturers and how best to make them aware of the voluntary standard. It was decided that the committee would solicit solutions/options (to the strangulation hazards posed by Roman Shades) from these same manufacturers

### Multiple Operational Cords

Caroleene Paul stated that the CPSC cannot support the use of multiple cords with a non-break away cord joiner due to the known hazard of strangulation in the loop above the cord joiner. It is true, however, that separate cords with tassels can tangle and form loops or tangle and become annoying enough for consumers to tie them up in knots. The ideal solution is a multiple cord break away device. A discussion followed on the technical difficulties involved with the break away device, including false trips and user frustration if the device is hard to reassemble.

The committee agreed that development of devices to manage multiple cords should continue.

### Top Down, Bottom Up (TDBU or BUTD)

Discussions centered on where to put language for TDBU products...in a product specific section of the voluntary standard or generically within the requirements. Rory McNeil will provide video clips of TDBU products demonstrating operating cords and configurations.

### Roll-Up Blinds

CPSC staff did some preliminary tests with roll-up blinds and determined that the lifting loop of a typical roll-up blind is a foreseeable strangulation hazard as 1) a free standing loop if the cord were to slide off the rolled up blind, and 2) an accessible inner cord where a child can place his/her head in the lift loop. A product with a break away in the head rail would have to meet the 3 lbf average (and no single force more than 5 lbf in test of 50 samples) because the hazard being addressed is strangulation. The 10 lbf requirement that addresses the ability of an inner cord to be pulled down into a loop is not applicable to the roll-up blind cord lift loop hazard.

CPSC staff and Rory McNeil will obtain more roll-up blind products and measure the forces generated in the head rail during operation of the product. Joe Cannaverde will calculate the theoretical values for the forces in the head rail.

### Hang Tag Applications

Sections 5.2.1 and 5.2.7 of the voluntary standard were discussed. There does not appear to be a requirement for horizontal blinds to provide warnings on inner cord hazards.

CPSC staff will review section 5.2.1 for potential comprehension issues for consumers. Tom Merker will send samples to CPSC and Health Canada.

### Tension Devices

Section 6.5.1 of the voluntary standard was discussed. Caroleene Paul stated that the CPSC fully expected the intent of the requirement, which is inoperation of a continuous cord product if the cord is not tied down with a tension device, to be met. It is the CPSC's understanding that the alternative "partially [inoperable]" clause was included to be an exception, and not the rule. Members of the committee will provide samples of devices to demonstrate the different ways they intend to meet the voluntary standard requirement.

### Additional Items

Levolor will provide illustrations for Figures 1 and 2 in AutoCAD and will provide input on ANSI Z534.4 to the committee.

The text size requirements in section 5.3.1.1 should be "not less than 3/32" instead of "not less than 3/16"

The Spanish translation for labels in section 5.3.1.1 has been corrected.

Health Canada will conduct step testing for UV and will provide recommendations for the next meeting.

### CPSC Action Items:

- measure the forces generated in the head rail during operation of a roll-up blind



## MINUTES

### Technical Committee Conference Call 888-582-3536 Code 5754464# February 21, 2008

#### Attendees

Comfortex Window Fashions ..... Rich Watkins  
CPSC ..... Caroleene Paul, Rene Raushchwalbe  
Health Canada ..... Stephen Drew, Shannon Whittle  
Hunter Douglas Inc..... Michael Daniels, Christopher Outlaw  
RollEase, Inc..... Joe Cannaverde  
Lewis Hyman ..... Wolfgang Moeller  
Springs Window Fashions ..... Tom Merker, John Morris  
Techstyles Window Covering ..... Rory McNeil  
WCMA..... Michael Tierney, Tina Cadet, Tim Bennett

The meeting was called to order at 11:05 a.m. by committee chairman John Morris. The meeting minutes from 10/30/2007 were approved.

Task group members and assignments were clarified: members were T. Merker (chairman), R. McNeil, P. Foley, J. Jankowski, C. Paul, S. Drew and M. Tierney; the group would address requirements for roman, natural and rollup shades, top down-bottom up shades, multiple operational cords and review of 4.3.8. R. McNeil was developing videos of the various products to facilitate the discussions.

Rich Watkins offered to provide Figures 1 and 2 with improved resolution.

ANSI Z534.4 Signage Updates – Tabled pending Pat Foley findings.

Appendix A Numbering – Michael Tierney pointed out that a reformatted section was attached at the end of the draft for committee review.

S. Drew offered to revise the test sequence of 6.6.3 for consideration at the April meeting. Cord replacement in 6.6.3.1 was clarified as shown in the draft.

Other open issues from Springs comments 10/27/2007: Spanish translations in 5.3.1.1 were corrected (except need to change original picture file to add "o menos"), origin of the text size requirements would be researched by C. Paul; the task group offered to pick up discussion of the test method in 6.5.1, and R. Watkins would provide suggestion for the weight attachment in 6.6.1.

Potential new product standards and ratings for energy efficient window coverings would be included on upcoming agendas.

Next Meetings: the task group would convene and review videos at the WCMA Annual Meeting on 3/27/2008. Another meeting would be arranged for April 29, 2008 from 8-3 at a Newark airport location.

The meeting was adjourned at 1:00 p.m.



WINDOW COVERING  
MANUFACTURERS  
ASSOCIATION

Subcommittee Meeting

March 7, 2008

Call in number: 877-339-0022 Room number: enter \*1973677\*

Attendees: Michael Tierney, Rory McNeil, Caroleene Paul, Joe Jankowski, Shannon Whittle, Tom Merker and Ralph Vasami

Discussion:

- Ralph opened with reminders about anti-trust guidelines
- Ralph reminded participants about committee that analyzes IDI reports
- Tom explained that the task group was meeting to review requirements for the product types on the agenda and to develop a proposal for consideration by the A100.1 committee
- Subcommittee discussed agenda items
  - Review accessible cords on Roman, Natural Shades, and Roll up products and make recommendations on how to minimize risk of strangulation:
    - Discussion was around current designs, accessibility of cords on back of the shades, range of pleat to pleat sizes. If product is made to the standard it is compliant.
    - No final recommendation was made.
    - Action: Rory will bring an example of Roman product for review at next meeting in Atlanta.
  - Multi-cords and risk of entanglement (single cords vs. joiners)- Subcommittee would review materials and make recommendation:
    - Discussed multi-cords. Use of joiners and break away devices tend to limit or reduce risk of tangling. Multi-cords with breakaway devices are capable of being knotted or taped together.
    - Recommendation is to create language and integrate into the safety standard indicating that cord joiners are a better solution than individually tasseled cords. The intent is to reduce risk of cords becoming entangled which can create a loop at the end of the cords. Guidelines for instructions will be needed to address stock blinds which can be shortened by the end-user.
    - Action: Tom will draft statement for review.
    - Action: Subcommittee will review and suggest revisions which will then be shared with larger committee.

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- Top Down, Bottom Up (TDBU or BUTD)- Sub committee would review materials related to excess cord and cords between top and intermediate rails and make recommendation:
  - Committee discussed the operation of the cord lift. When the shade is closed for maximum privacy (full deployed), the intermediate rail lift cord is at its maximum length from the headrail. Conversely, the standard lift cord which raises and lowers the bottom rail is at its minimum length from the headrail.
  - With respect to the intermediate rail cords (2 or more), they should be individually tasseled. A joiner would create a loop at a lower position.
  - With respect to the standard lift cord (bottomrail), they are subject to the requirements of the standard.  
Breakaway joiners could be used for each group of cords.
  - Recommendation is format section 4 Product Requirements section of the standard differently, to start with general requirements that pertain to all products (lead, small parts, etc...) and then add sections that discuss more specific requirements (BUTD, Roll-up Shades, etc...)
  - Action: Tom will draft statement and circulate  
Caroleene will discuss the exposed cords which are between the intermediate and headrails with Renae at CPSC. If Caroleene needs a sample of a BUTD shade she will contact Tom for sample.
- Review of roll-up type blinds.
  - There are possible solutions that can reduce risk:
    - Breakaway device to release lift cord from headrail
    - Bottom rail device that limits lift cord from being slipped over the end of the roll creating a free standing loop.
  - Recommendation is to add language in the standard specific to roll-up type shades.
  - Action: Tom will draft statement and circulate.

Thank you to all participants.

Reminder: Our next committee meeting is in Atlanta on Thursday March 27 from 8 until noon. The sub committee will present recommendations to the larger committee. Agenda is pending.