



UNITED STATES  
CONSUMER PRODUCT SAFETY COMMISSION  
4330 EAST WEST HIGHWAY  
BETHESDA, MD 20814

CHAIRMAN INEZ M. TENENBAUM

June 1, 2011

Mr. Ralph Vasami  
Executive Director  
Window Covering Manufacturers Association  
355 Lexington Avenue, 15<sup>th</sup> Floor  
New York, NY 10017

Dear Mr. Vasami:

Thank you for the Window Covering Manufacturers Association's (WCMA) efforts thus far to revise its voluntary standard on window coverings to address the strangulation hazard to children associated with corded window coverings. I appreciate the inclusive approach that the WCMA has taken to the voluntary standard revision process, including opening monthly steering committee meetings to the public and allowing more broad-based representation on the steering committee. I have previously encouraged all stakeholders and CPSC staff to continue participating in the WCMA steering committee, and, as long as I am confident the WCMA is committed to establishing a comprehensive revised voluntary standard, I will continue to do so.

The major effort currently underway to strengthen significantly the voluntary standard for window coverings demonstrates widespread agreement that the status quo concerning the safety of corded window coverings is not acceptable. I believe that the WCMA shares my view that the continuing trend of tragic deaths and injuries from preventable strangulation hazards that were first identified more than 30 years ago is very troubling. This is why the continued progress of the WCMA and the steering committee during the next few months, prior to the October 31, 2011, deadline for completion of the revised voluntary standard, is of critical importance. Given the significant length of time these addressable hazards have endangered children and the willingness expressed by many stakeholders to resolve them in a proactive manner through the voluntary standards process, the time is now for the WCMA to act and eliminate the strangulation hazards to children associated with corded window coverings.

I am writing today to recognize your current efforts to meet this goal but also to encourage WCMA and the steering committee to facilitate, rather than resist, the strengthening of some of the proposals currently being considered in the technical working groups. Although the voluntary standard is not yet complete, I remain very concerned that some of the revisions to the voluntary standard will fall short of eliminating the risk factors causing death and injuries, especially among toddlers and young children, from exposed cords on window coverings.

CPSC staff, including the agency's Associate Executive Director for Hazard Identification and Reduction, have previously expressed their strong concerns with some of the current proposals involving tension devices and breakaway devices. I urge you to encourage the technical and steering committees to review proposed solutions in light of these comments and other CPSC staff concerns and also to take seriously into account all additional issues raised by other stakeholders during the voluntary standards process. As the association representing the largest number of window covering manufacturers, your commitment to address fully all such concerns would serve as a demonstration of an unwavering commitment to safety and will help to ensure that all strangulation risks are eliminated in the revised voluntary standard.

Moreover, I encourage you to guard against accepting revised requirements that would continue to allow strangulation risks in window coverings out of a misplaced desire for convenience, aesthetics, or placating anyone who may wish to continue moving slowly, rather than proactively addressing this longstanding problem once and for all. I reaffirm to you my call for a comprehensive revised voluntary standard that eliminates—not just reduces—the strangulation risks from window coverings.

My interest in this specific issue remains steadfast, and I will continue to follow developments very closely. I eagerly look forward to seeing the draft revised voluntary standard by October 31, 2011, with a clear and comprehensive focus on eliminating the hazard of child strangulation associated with the use of corded window coverings.

Very truly yours,



Inez M. Tenenbaum

cc:

Jim Anthony, Hunter Douglas  
Rana Balci-Sinha, CPSC  
Ian Brodie, CSA  
Steve Birtles, Louvolite  
Joe Cannaverde, Rollease  
Colin Church, CPSC  
Stephen Drew, Health Canada  
Jack Feng, Newell Rubbermaid  
Tyler Goodier, Health Canada  
Louis Hornick III, Louis Hornick  
Joe Jankoski, Hunter Douglas  
Linda Kaiser, Parents for Window Blind Safety  
Joe Kovach, Hunter Douglas  
Robert LeBlanc, Lewis Hyman  
Derick Marsh, Rollease  
Don Mays, Consumers Union

Tom Merker, Springs Window Fashions  
Robert Ochsman, CPSC  
Carol Pollack-Nelson, Independent Safety Consulting  
Renaë Rauchschalbe, CPSC  
Jeff Sendlak, Bureau Veritas  
Rich Watkins, Comfortex  
Rachel Weintraub, Consumer Federation of America