U.S. Consumer Product Safety Commission
Log of Meeting

SUBJECT: WCMA Technical Subcommittee Meeting on window covering cords

DATE OF MEETING: May 25, 2004

LOG ENTRY SOURCE: Caroleene Paul C.P.

DATE OF LOG ENTRY: May 27, 2004

LOCATION: WCMA headquarters, New York, NY

CPSC ATTENDEE(S): Caroleene Paul

NON-CPSC ATTENDEE(S):

Timothy Bates	Techniku
Joseph F. Jankoski	Hunter Douglas Window Fashions
Carolynn R. Jennings	WCMA
Thomas J. Marusak	Comfortex Window Fashions
Rory McNeil	TechStyles
Suprena Millet	WCMA
John E. Morris	Springs Window Fashions
Maria Ungaro	WCMA

SUMMARY OF MEETING:

The purpose of this meeting was to discuss 9 items that were identified during the last conference call as issues that should be presented to the full WCMA Technical committee for consideration.

1) Labeling -- possible confusion interpreting what labels each product should have to be in compliance with the current requirements of ANSI A100.1.

After discussions that suggested the standard specifically state labeling requirements by product, it was agreed that the labeling requirements should remain broad enough to apply to certain configurations that may occur in any product. However, a more descriptive clarification of each configuration and the labeling that should accompany that configuration may be appropriate. This issue can be added to the agenda for the next full committee meeting.

2) Labeling -- situations where labels that meet the current standard requirements will not physically fit on certain products.

John Morris provided examples of 2 labels that would be too large for specialty blinds that are narrow enough to cover vertical windows on the sides of a front door. It would not be preferable to move the warning label to the headrail because it is not visible to the consumer.

Caroleene Paul agreed to consult Tim Smith (who drafted the current labeling requirements) on the best way to address this issue.

3) Inner Cords -- how do variations in product and product installation affect the effectiveness of inner cord stops?

Rory McNeil presented 2 different horizontal blinds that were purchased at Wal-Mart for $5 and $8 apiece. The $5 PVC blind contained a separate instruction sheet with generic warning against child strangulation and specific instructions on how to adjust the inner cord stops. The $8 aluminum blinds contained a similar warning and instructions in the body of the general installation instructions. Two other instructions sheets from popular stock blind manufacturers (Rory did not have samples of the products) did not contain any warning or specific instructions for adjustment of the inner cord stops.

In addition to the inconsistent dissemination of safety information on inner cord stops in various products, a general observation was made that a greater danger appears to be the possible failure of the consumer to adjust the length of a stock blind to a window that is shorter in length than the blind. In that case, the bottom rail of the blind will be stacked on the window sill (a situation that allows the inner cord to be pulled out) and the inner cord stop will be lower than 2 inches from the head rail because it was set for the full length of the blind in the lowered position. This scenario is plausible and was recently seen by Tom Marusak.

Ways to draw the user's attention to the importance of proper adjustment of the inner cord stops (such as placing a warning tag directly on the stops) were discussed. This issue will be presented to the full committee, with an emphasis that companies that manufacture stock blinds get involved. The current members of the subcommittee primarily deal with custom blinds.

4) Inner Cords -- A loop in inner cords can be caused by the bottom rail being pulled up when the inner cord from the middle of the blind is pulled down.

Caroleene Paul reported that all the fatal incidents associated with the inner cord involved the victim pulling the inner cord down from the lower slats and through the headrail. The typical case involved an infant, 11 to 17 months old, who was in a crib that was placed near a window. However, there is one non-fatal incident where a 5 yr old boy formed a loop in the inner cord in the center of a horizontal blind by pulling the bottom rail up. He placed his head in this inner cord loop and was later able to extricate himself.

5) Window covering products that are shipped for commercial use.

This issue will be presented to the full committee for review.

6) Tension devices

The results of the study indicate that the proper use of inner cord stops and tension devices would have the most significant impact on the fatal incidents that are occurring. In particular, the use of a tension device would have addressed every incident that involved a continuous loop control. This fact supports the logic of designing a product where use of the safety device is ensured. Various ideas to ensure use of a tension device were discussed, and it was agreed that this issue should be presented to the full committee for review.

7) Relative safety of multiple cords

There is an ongoing debate on which is the safer configuration on horizontal blinds that use multiple cords: a) multiple cords with separate tassels, or b) multiple cords that terminate in a stop ball 2 inches below the headrail (in the fully lowered position) with a single cord beneath the stop ball. Multiple cords can tangle to form a loop (or can be tied into a loop by the user), and non-break away stop balls have a loop above the ball that is accessible when the pull cords are pulled down to raise the blinds. Caroleene Paul stated that there is one fatal incident where the multiple cords appeared to tangle into a

knot and one fatal incident involving the loop above a stop ball. The merits and disadvantages of each configuration were discussed with no resolution because without supporting data, it is a difference of opinions.

8) Top down / bottom up window covering products

Samples of cellular, pleated, and roman shades with the top down/bottom up design were presented. Configurations where a loop could form were identified, and the most foreseeable configuration can be solved with a break away stop ball. This issue will be presented to the full committee for review.

9) Cost of technology that would meet a 7.25 inch maximum exposed loop requirement.

Tom Marusak presented a table of the current technologies that would meet the requirement and the percentage increase in cost of various products (from custom to stock products) that would result if they were modified to incorporate a complying technology. The main options are motorized blinds, cordless blinds, and wands (only applicable on vertical blinds and drapes). There is a significant increase in the cost to manufacture custom blinds with a complying technology and a very significant cost increase for stock products. The cost comparison indicates that it is not economically feasible to make stock products essentially cordless.

Caroleene Paul stated that the options of a motorized or cordless product do not appear to be economically feasible as a means to meet a 7.25 inch exposed loop requirement. However, such a requirement is a narrow solution to the real problem of cords that can be modified to form a loop or to be wrapped by a child around his/her neck. Caroleene Paul suggested the fixation on the 7.25 inch cord be replaced with ideas on how the issue can be addressed. The results of the study indicate that modification of the cord is a foreseeable action. This fact should be addressed by the standard.

Additional items:

Caroleene Paul informed the subcommittee that a preliminary analysis of non-fatal incidents revealed useful information on how hazards occurred. Caroleene Paul suggested that the subcommittee review the non-fatal incidents as a supplement to the data on which the study was developed. In addition, the fatal incidents from 2003 should be reviewed and added to the database. Both databases should be updated regularly to provide both CPSC and WCMA with the most comprehensive data analysis for present and future use. The subcommittee agreed with these suggestions.

Next Action:

The subcommittee will bring all issues to the full committee for review. The meeting will most likely be in New York or New Jersey, sometime in July.