

Consumer Federation of America  
Kids In Danger · Consumers Union  
Parents for Window Blind Safety

June 14, 2012

The Honorable Daniel Inouye  
Chairman  
Committee on Appropriations  
S-128 Capitol Building  
Washington, D.C. 20510

The Honorable Thad Cochran  
Ranking Member  
Committee on Appropriations  
Dirksen Senate Office Building, #113  
Washington, D.C. 20510

Dear Chairman Inouye and Ranking Member Cochran:

As organizations dedicated to protecting children from unsafe products, we write to urge you to oppose any amendment offered to the Financial Services and General Government Appropriations bill for FY 2013 that would strike the language requiring the U.S. Consumer Product Safety Commission (CPSC) to promulgate a mandatory standard for window coverings.

Window coverings pose a predictable, quantifiable, persistent and preventable strangulation threat to children. According to data from the CPSC, at least one child every four weeks has died over the last twenty seven years from strangulation caused by window blind cords. Further, CPSC has a record of 140 incidents since 1999 that resulted in serious injuries to children. This rate has not changed since 1983, despite what representatives of the window blind industry claim. The problem is so pervasive that last year, the U.S. Consumer Product Safety Commission, Health Canada, and the EU's DG Sanco all called on manufacturers to address the strangulation risk caused by corded window coverings.

Unfortunately, the voluntary standard effort led by the Window Covering Manufacturers Association (WCMA) has failed. The process, which is not yet final, has been recognized as highly flawed. WCMA's efforts to develop the standard have not been transparent and WCMA has withheld information from consumer participants and some small business representatives and has refused to consider their recommendations. The process has been so defective that, in a highly unusual move, consumer groups withdrew from it last September. The fundamental failure with the standards is that it does not address the strangulation hazard posed by window covering cords. Although the voluntary standards process is ongoing and WCMA must consider the negative ballots submitted by consumer organizations, this consideration has been wholly inadequate to date.

In refusing to address the strangulation risk posed by cords, WCMA claims that "there is no universal technological solution to eliminate corded products." In fact, the industry does have cordless and cord inaccessible alternatives in their current product lines. Additionally, their claim misses the point entirely. It is not necessary to have a single "universal" solution that

works for every window blind, in order to significantly reduce death and injuries cause by window blinds. In reducing the strangulation risk, different solutions can be applied to different products. Importantly, the technology to eliminate cords on window coverings already exists. Fixes for stock products exist and are being sold in large retail stores today and several manufacturers currently offer cordless window coverings.

We support a mandatory standard for window coverings. The window covering industry has been working on the voluntary standard since 1994 when the U.S. Consumer Product Safety Commission requested that they do so. Since that time, in version after version, WCMA has refused to incorporate solutions to adequately address the strangulation hazard posed by cords in window coverings. WCMA has repeatedly shown that they are not interested in incorporating effective strangulation prevention solutions into the voluntary standard. Given the industry's refusal to address the known hazard in the voluntary standard, it is appropriate and necessary for a mandatory standard to be promulgated to effectively address this hazard.

**We urge you to oppose any amendment that would strip the FY 2013 Financial Services and General Government Appropriations bill of language requiring the CPSC to promulgate a mandatory standard for window coverings.** Further supporting a flawed voluntary standards process that has resulted in dangerously inadequate consumer protections retains the status quo that continues to put children at risk.

Sincerely,

Rachel Weintraub  
Director of Product Safety and Senior Counsel  
Consumer Federation of America

Nancy Cowles  
Executive Director  
Kids In Danger

Linda Kaiser  
President  
Parents for Window Blind Safety

Ioana Rusu  
Regulatory Counsel  
Consumers Union

Cc: Members of the Senate Appropriations Committee