



## Consumer Federation of America

To: WCMA  
From: Rachel Weintraub, CFA  
Date: August 31, 2022  
Re: Ballot vote- WCMA/ANSI A100.1 for Safety of Window Covering Products

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I am submitting a negative vote on this ballot, WCMA/ANSI A.100.1 for the Safety of Window Covering Products because the voluntary standard does not effectively address the strangulation hazard posed by custom corded window coverings.

I am voting negative because substantively the voluntary standard does not effectively address the strangulation posed by cords on window coverings and also want to raise procedural concerns with this standards process.

### Substantive Concerns

The standard should mirror the provisions of the voluntary standard for stock products and should prohibit accessible cords for custom products. This is technologically feasible and should be the solution. Instead, the current version of the standard relies upon flawed devices to address the accessibility of hazardous cords- such as tension devices.

Tension devices are associated with deaths, and we also know that correctly attaching tension devices is challenging and inconsistent for consumers. Relying on tension devices should not be a methodology of this voluntary standard. We urge removal of both Tension Device (section 4.4.2.5.1) and removal from acceptable methods (in 4.4.2.5) for Continuous Loop Operating Systems.

Retractable cords are also permitted under this voluntary standard, which would allow for thirty-six inches of exposed cord. Thirty-six inches should be prohibited and reduced to twelve inches. We know that significantly limiting the length of accessible cords prevents strangulation deaths and injuries. This provision should reflect that knowledge.

The safety of batteries used in remote controls for custom window coverings is not adequately addressed in this standard. In section 4.3, it includes that applicable batteries meet the requirements of ANSI/UL 4200A but that is not sufficient because that standard addresses only lithium batteries and technologies. This standard should include all batteries used in remote control devices and not just lithium.

### Procedural Concerns

Most of these concerns have been raised previously to WCMA, both by the Consumer Product Safety Commission (CPSC) and by Parents for Window Blind Safety, Consumer Federation of

America, and Independent Safety Consulting but no conversation about these concerns took place during the public meetings. Parents for Window Blind Safety, Consumer Federation of America, and Independent Safety Consulting actually sent two detailed letters to Mr. Vasami throughout this process and these concerns were never raised nor discussed publicly.

Further, a proposed mandatory standard exists, and the existence of that proposal did not impact the work of this standards committee and was never discussed. This was a significant oversight.