

*Consumer Federation of America *Consumers Union *
* Independent Safety Consulting *
* Parents for Window Blind Safety *

September 15, 2011

Senator Daniel Inouye
Chairman
Committee on Appropriations
United States Senate
S-128 Capitol
Washington, DC 20510

Senator Thad Cochran
Ranking Member
Committee on Appropriations
United States Senate
S-146A Capitol
Washington, DC 20510

Dear Chairman Inouye and Ranking Member Cochran:

Our groups write in support of language that we understand may be included in the FY2012 Financial Services and General Government Appropriations bill that would seek to eliminate the strangulation hazard posed by accessible cords on window coverings.

Since 1983, 497 children have been killed or seriously injured by accessible cords on window coverings. The rate of injuries and deaths has not been significantly reduced since 1983. The existing voluntary standard for window blinds, shades and other window coverings as well as the recalls of millions of window blinds by the U.S. Consumer Product Safety Commission (CPSC) have not led to the reduction of the hazard posed by the accessible cords of these products.

In acknowledging the need for a more robust standard, in June 2010 the CPSC, Health Canada and the European Union's DG Sanco, urged the Window Covering Manufacturers Association (WCMA) to *eliminate* the strangulation hazard posed by corded window coverings. Unfortunately, this effort has resulted in a flawed process with an unsatisfactory result.

While consumer groups and government agencies were permitted to participate in a limited way as part of a standards development steering committee, consumer group recommendations were ignored. The revision process has been neither collaborative nor transparent. The current draft of the standard, which is anticipated to be final at the end of October, includes only minor revisions to the previous version and does not reflect consumer or governmental involvement. Consumer groups took an unusual and significant step and withdrew from the standards development process this month because it became increasingly clear that the flawed process would result in an unacceptably weak standard that failed to eliminate the hazard. Continuing to permit long pull cords on products, as the current draft standard continues to allow, will not reduce, minimize, nor eliminate the hazards. As a result, more children will be strangled from these accessible long pull cords.

In 1994 the window blinds industry submitted a "Voluntary Corrective Action Plan" to CPSC to address hazards posed by products and to implement a consumer education program. In that document, the industry stated regarding product modification that, "This interim solution will be used until better technology is developed." In 17 years, however, while technology *has* developed,

the industry-led voluntary standards process has once again failed to uphold their commitment to address the major hazards posed by window coverings.

A mandatory standard that eliminates the hazard is necessary. Innovative technological safety solutions have not been incorporated into the current draft standard by WCMA even though they exist. Cordless products are available as a small percentage of the market but the disproportionately higher price point makes them economically unfeasible for many consumers. Only a mandatory standard will create a safe and even playing field with which all window covering manufacturers must comply. Furthermore, this will drive the price down. In addition, a mandatory standard that eliminates the strangulation hazard will allow for innovation of various cordless products giving smaller manufactures a chance to flourish, increase their profits and create new jobs.

Almost every home in the United States has window coverings. Too many consumers are unaware of the hazards posed by these products. Almost 500 families found out about the hazards caused by these products when it was too late – after their child was killed or seriously injured. These hazards are preventable, the technology exists to eliminate the hazard, and yet industry has continued to reject these efforts for well over a decade. A mandatory standard promulgated by CPSC that eliminates this deadly hazard is long overdue.

If language is included in the FY12 Financial Services and General Government Appropriations bill to address this safety hazard, we urge your support and urge you to oppose any amendment that might be offered to strike it. Thank you for your consideration.

Sincerely,

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CC: Members of Senate Appropriations Committee