

June 1, 2015

Office of the Secretary
Consumer Product Safety Commission
Room 502
4330 East-West Highway
Bethesda, Maryland 20814
Via: www.regulations.gov

Comment Letter of 31 State, Local and National Consumer Organizations to the U.S. Consumer Product Safety Commission regarding Corded Window Coverings Advanced Notice of Proposed Rulemaking, CPSC Docket No. CPSC- 2013-0028

June 1, 2015

As consumer organizations representing consumers from across the country, we submit these comments in support of the U.S. Consumer Product Safety Commission's (CPSC) development of a mandatory standard that prohibits hazardous, accessible window covering cords.

We strongly support the CPSC's efforts to move forward with the mandatory standard because the window covering industry's voluntary standard which relied heavily on warnings has been ineffective. Industry's voluntary standard has not significantly reduced the death rate. The CPSC is aware of 184 deaths due to strangulation and 101 severe injuries that did not result in death by cords on window coverings from 1996 through 2012. The CPSC estimates that at least 11 children die each year as a result of cords on window coverings.

The CPSC must pass a rule to address the hazards posed by window coverings because the window covering industry's voluntary standard, for almost 20 years has repeatedly failed to address the issue in an effective way. The CPSC has had years of communicating with the manufacturers of these products and again and again the industry refuses to make significant changes. Decades have passed with the number of deaths and permanent injuries mounting, unabated. We need the CPSC to pass a mandatory law to address this public health issue.

There are products on the market that do not pose strangulation risks to children. This means that the research and technology already exists to design products without strangulation risks. Manufacturers know how to do this. Although safer designs are available on the market, manufacturers currently sell them at a premium, making them cost-prohibitive for many parents. If there is a mandatory standard, the price will surely drop, making these more affordable to all – not just the wealthy. If the CPSC enacts a mandatory rule, it will ensure that this minimum level of safety is applied to all products for sale in the market. This will protect all consumers

effectively and will strengthen the market for companies who want to innovate to protect children.

We thank the CPSC for addressing this issue in an effective way and urge the agency to issue a mandatory standard as quickly as possible to prevent more deaths and life-changing injuries to children in the United States posed by cords on window coverings.

Sincerely,

Arizona PIRG

California PIRG

Chicago Consumer Coalition

Colorado PIRG

Connecticut PIRG

Consumer Action

Consumer Federation of America

Consumer Federation of California

Consumers Union

Florida PIRG

Georgia PIRG

Illinois PIRG

Iowa PIRG

Massachusetts PIRG

Maryland PIRG

Missouri PIRG

National Consumers League

New Hampshire PIRG

New Jersey PIRG

New Mexico PIRG

New York PIRG

Ohio PIRG

Oregon PIRG

Pennsylvania PIRG

PIRG in Michigan

Rhode Island PIRG

Texas PIRG

Virginia Citizens Consumer Council

Washington PIRG

Wisconsin PIRG

U.S. PIRG