



LAB LOCATION: **VIET NAM REPORT NUMBER:** 76122-090357 **ISSUE DATE:** Sep. 26, 2022 PAGE: 1 of 24

Applicant:	Công ty TNHH MTV Sản Xuât Nội Thất Tấn Hoàng			
Address:	Thửa đất số 397, 1437 tờ bản đồ số 9, khu phố Khánh Hội, phường Tân Khánh, thị xã Tân Uyên, Bình Dương			
Contact:	TRẦN THỊ THANH NGA			
TEL:	0274 3686723 <b>FAX:</b> -			
E-mail:	Congtytanhoang2403@gmail.com			
Copy To:	-			

OVERALL RATING	
PASS	<u>X</u>
FAIL	-
DATA	-

Sample Information					
Sample Description	ample Description LOFT BED				
Style Number	1				
SKU	MF297907AAB, I	MF297908AAB			
Vendor Name	-				
Quantity	-	PO Number	-		
Buyer's Name	GIGACLOUD TECHNOLOGY (USA) INC	Manufacturer	-		
Country of Origin	-	Country of Destination	-		
Code Number	-	Dept./Key#	-		
Reference item/ style number	-	Color	BLACK		
Date of Submission	Sep. 20, 2022	Test Performance Dates	Sep. 20, 2022		
Testing Status					
Pre-Shipment Lead Test		Test for Protocol	-		
Retest		Previous Report No.: -			



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### Sample Photos



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For and on behalf of **Eurofins MTS Consumer Product Testing** Vietnam Ltd.

HARRY VU

**HL. DEPARTMENT SUPERVISOR** 



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### **EXECUTIVE SUMMARY:**

TESTING RESULT SUMMARY					
Test Property	PASS	FAIL	DATA	COMMENTS	
Total Lead Content in Surface Coating – 16 CFR 1303	Х	-	-	-	
Total Lead Content in Substrate	X	-	-	-	
ASTM F1427 – 21e1, Standard Consumer Safety Specification for Bunk Beds	Х	-	-	-	
16 CFR Part 1213 Safety Standard For Entrapment Hazards In Bunk Beds	Х	-	-	-	
16 CFR Part 1513 Requirements For Bunk Beds	Х	-	-	-	
Sharp Point, Sharp Edges	Х	-	-	-	



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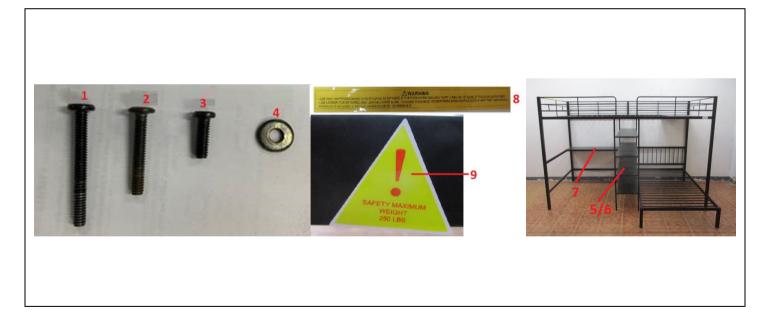
#### **COMPONENT BREAKDOWN LIST:**

Test Item	Component Description
01	Silvery metal with black plating (Long Allen head bolt) (Additional sample was tested)
02	Silvery metal with black plating (Medium Allen head bolt) (Same item 1)
03	Silvery metal with black plating (Short Allen head bolt) (Same item 1)
04	Silvery metal with black plating (Flat washer) (Same item 1)
05	Black coating on metal (Bunk bed) (Additional sample was tested)
06	Silvery metal (Bunk bed) (Additional sample was tested)
07	Particle board
08	White paper with yellow/ black printing (Warning label)
09	White paper with yellow/ red printing (Maximum label)

#### Remark:

- Test result of Total Lead Content in Surface Coating of items #05 was provided by report 96221920408.
- Test result of Total Lead Content in Substrate of items #01, 06, 07, 08, 09 were provided by report 96221920408.

#### **EXHIBIT BREAKDOWN:**





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### 1. ASTM F1427 - 21e1 STANDARD CONSUMER SAFETY SPECIFICATION FOR BUNK BEDS

Clause	Requirement	Rating	Notes
	nance Requirements:		
4.1 Vertica	al Protrusions:		
4.1.1	All vertical protrusions along the top inside surfaces of any individual component (including but not limited to bed end structures and guard rails) of the upper bunk shall not extend more than 3/16 in. (4.8 mm) above the upper edge of the adjacent surface.  Ladder stiles (uprights) shall not extend more than 3/16 in. (4.8 mm) above the upper edge of the adjacent surface.	Р	✓ Vertical protrusion:1/16in. Position: corner post.  ✓ Ladder stiles:0in.
4.1.2	Any cap used along the top surface of the upper bunk shall not have a vertical protrusion greater than 3/16 in. (4.8 mm) at the edge of the protrusion above the upper edge of the adjacent surface. If the cap is flush with or overhangs the edge of the corner post or other vertical protrusion, the maximum vertical protrusion shall not exceed 3/16 in. (4.8 mm). The cap shall have a maximum height of no more than 20% of the width or diameter of the cap. At no point shall the cap overhang the post more than 1/16 in. (2 mm). The cap shall fit flush with the top of the corner post.	NA	☐ H:in. W:in. (H <sub>max</sub> = 20%W) ☑ No cap
4.2	Fit of Top Bed to Bottom Bed:	NA	Record:in.
	The bed post shall be designed so that the minimum height of lift to allow horizontal disengagement of the top bed from the bottom bed shall be 1.25in., or a fastening mechanism may be used that will prevent the		<ul><li>☐ A fastening mechanism provided</li><li>☑ Bed post no separate</li></ul>
	disengagement of the top bed from the bottom bed.		E bed post no separate
4.3	Mattress and Foundation Size and Fit (Top Bed):	Р	
	There shall be no gaps between the interior bed structure and the edges of the mattress and foundation that will permit complete passage of the wedge block when tested in accordance with 5.2.		
4.4	Mattress Size and Fit (Lower Foundation):	Р	
	There shall be no space, between the edge of the manufacturer's recommended mattress and the interior boundary of any component(s) attached to lower bunk (for example, ladders, book shelves, desk), greater than 1.88 in. (48 mm) and smaller than 9 in. (229 mm), when tested in accordance with 5.3.		
4.5 Upper	and Lower Foundation Support Systems:		1
4.5.1	The foundation support systems shall confine the horizontal position of the mattress and the foundation and shall prohibit the mattress and foundation from falling when the mattress or foundation is manipulated.	Р	
4.5.2	In the event cross-members are utilized, a minimum of two per bed are required. If more than two cross-members are utilized, they shall be spaced so that the distance between adjacent cross-members or between the cross-members and the bed end structures will not permit complete passage of the wedge block or will allow complete passage of both the wedge block and the 9 in. (229 mm) diameter rigid sphere when tested in accordance with 5.9.	Р	Upper foundation: -Slat to slat: 3_inSlat to Bed end structure: 2-1/2_in. Lower foundation: -Slat to slat: 3_inSlat to Bed end structure: 2-5/8_in.
4.5.3	The foundation support system shall not be capable of being dislodged without the release of positive fastening devices or the use of hand tools.	Р	
4.5.4	The foundation support system shall not fail when tested in accordance with 5.4.	Р	



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Clause	Requirement	Rating	Notes
4.6 Side F	Rails:		
4.6.1	Bolt-On Side Rails, that attach at their ends or on their side to the bed post, are secured at each end by2 bolts with a minimum size of M6 in. diameter/ ISO/ANSI size M6 (REQ: >0.25 in. diameter or M6)	Р	If it is Hook-On side rail, NA
	If it is wood bed, these bolts are spaced a minimum of:in. apart on their center. (REQ: >1.5in.)		
	When the bolts are fully tightened in the assembled bed, no more than <b>0.25 in</b> . of thread is exposed? <u>Yes</u>		
4.6.2	Hook-On Side Rails, securely attached to the bed post. Hook-on attachments shall require an additional action other than an upwards force to disengage.	NA	If it is Bolt-On side rail, NA
4.6.3	Side Rail Attachments:	Р	
	There shall be no structural failure of bed side rail fastening systems when tested in accordance with 5.5.		
4.7 Guard	Irails:		
4.7.1	The underside of the foundation is: <u>57-3/4</u> in. from the floor.	Р	
	(REQ: over 30 inches.)		
	How many guardrail(s) accompany the bed:		
	(REQ: 2 guardrails.)		
4.7.2	Any intentional release of fastening device is present for guardrails so that they cannot be removed unless forces are applied sequentially in different direction? <b>Yes</b>	Р	
4.7.3	The upper edge of the guardrails is: <u>5-5/8</u> <b>in.</b> above the sleeping surface when a mattress of the thickness that is the maximum specified by the manufacturer's instruction is used on the bed. ( <i>REQ:</i> <u>&gt; 5in.</u> )	Р	
4.7.4	With no mattress on the bed, there shall be no openings in the rigid bed structure below the lower edge of any opening of the guardrail that would permit complete passage of the wedge block when tested in accordance with 5.6.	Р	
4.7.5	The guardrail terminate before reaching the bed end structure, the distance between either end of the guardrail and the bed end structures in the same plane when measured at a point 5 in. above the sleeping surface as established by the maximum mattress thickness specified by the manufacturer: $11$ in. $(R: \le 15in.)$	Р	
	The second guardrail terminate before reaching the bed end structure, the distance between either end of the guardrail and the bed end structure when measured horizontally between the bed end structure and the nearest point on the guardrail:		



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Clause	Requirement	Rating	Notes		
4.8 Bed S	tructure:				
4.8.1	The total distance between the two posts at the head of the upper bunk: _53-1/8_in.	Р			
	The distance between the two posts at the head of the upper bunk at 5 in above the sleeping surface: _53-1/8_in.				
	Percentage of that at the head: <u>100</u> _ <b>%</b> ( <i>R</i> : ≥ 50%)				
	The total distance between the two posts at the foot of the upper bunk:53-1/8 _ in.				
	The distance between the two posts at the foot of the upper bunk at 5in above the sleeping surface: _53-1/8_in.				
	Percentage of that at the foot:% (R: ≥ 50%)				
4.8.2	There shall be no openings in the rigid end structures of the upper bunk/bunks that will permit the free passage of the wedge block when tested in accordance with 5.7.1. This requirement shall apply only to those portions of the bed end structure that are above the foundation support system of the upper bunk/bunks.	Р			
4.8.3	When tested in accordance with 5.7.2, there shall be no openings within the entire boundary of the lower bunk that will permit free passage of the wedge block, unless they are large enough to permit the free passage of a 9 in. (229 mm) diameter rigid sphere. This requirement does not apply to openings that are below the level of the lower bunk foundation support system. This requirement shall apply to that portion of the bed structure that is between the level of the lower bunk foundation support system and the level of the upper bunk foundation support system. Such openings include, but are not limited to, bed end structures, foundation, ladders, desks, or bookshelf components, or a combination thereof, as offered with the bed for purchase and designed to be attached to the bed structure.	Р			
4.8.4	When tested in accordance with 5.7.2.3 and 5.7.2.4, all portions of the boundary of any opening of the entire lower bunk boundary that permits free passage of a 9 in. (229 mm) diameter rigid sphere also must conform to the neck entrapment requirement.	Р			
4.9 Ladde	4.9 Ladders:				
4.9.1	Type of ladder:	Р	☐ Not Provided		
	incorporated as part of the bed structure		□ No Ladder		
	Is the ladder attached in a manner that prevents inadvertent disengagement, repositioning, or tilting while in use? Yes				



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Clause	Requirement	Rating	Notes
4.9.2	Are there openings between ladder structures that allow complete passage of the wedge block? <u>Yes</u> If Yes, does the 9 in. diameter rigid sphere pass freely through the openings? <u>Yes</u>	Р	a
	Width of the ladder measured from the inside of the stiles:12-7/8 in. (R: ≥10in.) (a)		
	Vertical spacing of ladder steps measured between steps: 12 in. (R: <12in.; if bed structure are used as ladders, vertical spacing <16in.) (b)		_
	Vertical spacing of ladder steps measured from the floor to the first step:  11-7/8 in. (R: <12in.; if bed structure are used as ladders, vertical spacing <16in.)		
4.9.3	Are there openings between the ladder step and the upper bunk boundary that allow complete passage of the wedge block? <u>Yes</u> If Yes, does the 9 in. diameter rigid sphere pass freely through the	Р	
	openings? Yes		
4.9.4	For ladders attached to the side of the lower bed and for which mattress height is above the side rail, there shall be no gaps between the edge of the manufacturers recommended mattress and the interior vertical stile between 1.88 in. (48 mm) and 9 in. (229 mm) when tested in accordance with 5.3.	Р	Record:in.
4.10	Metal Beds: Frame and Fastenings:	Р	
	There shall be no separation of any of the attachments of the foundation support system to the end structures of the bed when tested in accordance with 5.8.1.1 and 5.8.2.		
5 Test Me	thods:		
5.1	Is the bed assembled in accordance with the provided instructions? Yes	Р	
5.2 Mattre	ess and Foundation Size and Fit—Upper Foundation:		
5.2.1- 5.2.3	Is any gap produced in the horizontal plane between the interior bed structure and the edges of the mattress and foundation as per section 5.2.2? <u>Yes</u>	Р	If F, attach photo and locate the failure gap(s):
	If <b>Yes</b> , does the wedge block pass through the gap(s) as per section 4.3? <u>No</u>		
5.3	Mattress Size and Fit—Lower Foundation	Р	
	Are there any space between the edge of the manufacturer's recommended mattress and the interior boundary of any attached component is between 1.88 in. (48 mm) and 9 in. (229 mm)? <b>No</b>		
5.4	Foundation Support System	Р	
	Does the foundation support system remain in place for a minimum of 5 min as per section 4.5.4? <u>Yes</u>		



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Clause	Requirement	Rating	Notes
5.5	Side Rails	Р	
	Apply force at Corner 1 of the bed? Yes		
	Apply force at Corner 2 of the bed? Yes		
	Apply force at Corner 3 of the bed? Yes		
	Apply force at Corner 4 of the bed? <u>Yes</u>		
	Is there no structural failure of bed side rail fastening systems as per section 4.6.3? <u>Yes</u>		
5.6	Guardrails	Р	
	Is there no opening in the rigid bed structure below the lower edge of any opening of the guardrail that would permit complete passage of wedge block as per section 4.7.4? <u>Yes</u>		
5.7 Bed E	ind Structures:		
5.7.1	Is there no opening in the rigid end structures of the upper bunk that will permit the free passage of the wedge block as per section 4.8.2 <b>Yes</b>	Р	
	(This requirement shall apply only to that portion of the bed end structure that is above the foundation support system of the upper bunk.)		
5.7.2 Low	er Bunk Boundaries:		
5.7.2.1	Without a mattress or foundation on the lower bunk foundation support, place the wedge block into any opening, tapered side first, in the most adverse orientation. Determine if the wedge block can pass freely through the opening. If the wedge block passes freely through the opening, determine if a 9 in. (229 mm) diameter rigid sphere can pass freely through the opening.	Р	
5.7.2.2	With the manufacturer's recommended mattress and foundation size in place, on the lower bunk foundation support, repeat the test in 5.7.2.1.	Р	
5.7.2.3- 5.7.2.4	Is any portion of the boundary of any opening of the lower bunk end structure that permits free passage of a 9 in. diameter rigid sphere? Yes If Yes, is there simultaneous contact between the boundary of the opening and both sides of the A section of the template? Yes If Yes, does the neck portion of the B section of the template completely enter the opening (passes 0.75in. or more beyond the points previously contacted by the A section of the template)? No	P	
	If <b>Yes</b> , does its lower boundary slope downward less than 45° for the whole distance from the narrowest part of the opening the neck can reach to the part of the opening as per section 4.8.4? * <b>Yes/ No/ NA</b>		
5.8 Metal	Beds- Frame and Fastenings:		
5.8.1- 5.8.1.1	Number of cycle _10000_ /_10000_ Number of loads per minute:20 (R: <24 loads per minute)	Р	_
	Is there no separation of any attachments of the foundation support system to the end structure of the bed as per section 4.10? <u>Yes</u>		



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Clause	Requirement	Rating	Notes
5.8.2	Apply _298_N force at each point of attachment of the foundation support system to the end structure.	Р	
	Is there no separation of any attachments of the foundation support system to the end structure of the bed as per section 4.10? <u>Yes</u>		
5.9	Are cross-members utilized? Yes	Р	
	If <b>Yes</b> , Number of cross-members per bed: Upper bunk bed20 & Lower bunk bed20 (R: \geq 2)		
	If <b>More than 2</b> , does any gap(s) between adjacent cross-members or between the cross-members and the bed end structure permit complete passage of the wedge block? <b>No</b>		
	If <b>Yes</b> , does the gap(s) also permit complete passage of the 9 in. diameter rigid sphere? <u>Yes/No</u>		
	This requirement applies to both the upper and lower bunk foundation support systems.		
	nanency of Labels and Warnings		
5.10.1- 5.10.2	It is a <b>Paper Label</b> Label on the bed	Р	
	Is it a permanent label as tested per section 5.10.1 or 5.10.2? <u>Yes</u>		
5.10.3	Is the label attached by a seam? <u>Yes/ No</u>	NA	
	Does it detach when subjected to a 15-lbf. Pull force applied as per section 5.10.3? Yes/ No		
5.10.4	Can the tape test defined in Test Method B, Cross –Cut Tape Test of Test Methods D 3359 apply on all the warnings label? Yes/ No	NA	
	Is the printing in the area tested legible or attached after being subjected to this test? Yes/ No		
5.10.4.4	Shall the non-paper label during an attempt to remove it without the aid of tools or solvents, not be removed or not fit entirely within the small parts cylinder defined in 16 CFR 1501 if it can be removed? Yes/No	NA	
6 Marking	and Labeling:		
6.1	Each bunk bed set shall have label or marking to indicate the following: Name, City, State, & Zip code (1) of the manufacturer, distributor, or seller. Model number (2), the Month & Year (3) of manufacture	Р	(1): GIGALOUD TECHNOLOGY(USA) INC 18961 ARENTH AVENUE, CITY OF INDUSTRY, CA, 91748 (2): MF297907AAB/MF29790 8AAB (3):09/2022
6.2	Warnings		-



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Clause	Requ	irement	Rating	Notes
6.2.1.1	label shown in either Fig. 10(a permanently to the inside of a bed	oart of the bed structure, the warning ) or Fig. 10(b) shall be attached end structure of the upper bunk in a the bedding but that may be covered	P	
6.2.1.2	To help prevent serious or fatal injuries from entrapment or falls:  Never allow a child under 6 years on upper bunk. Use only mattress which is 74"-75" long and 371/5"-381/5" wide on upper bunk. Ensure thickness of mattress and foundation combined does not exceed and mattress is at least 5" below upper edge of guardralls. Use guardralls on both sides of upper bunk. Prohibit horseplay on or under bed(s). Prohibit more than one person on upper bunk. Use ladder for entering and leaving upper bunk. STRANGULATION HAZARD — Never attach or hang items to any part of the bunk bed that are not designed for use with the bed; for example, but not limited to, hooks, belts, and jumpropes.  DO NOT REMOVE THIS LABEL	To help prevent serious or fatal injuries from entrapment or falls:  • Never allow a child under 6 years on upper bunk.  • Use only mattress meeting the following specifications on upper bunk:  Bed Type Length Width  Standard Length 74"-75" 37½"-38½"  Extra Long 79"-80" 37½"-38½"  • Ensure thickness of mattress and foundation combined does not exceed " and mattress is at least 5" below upper edge of guardralls.  • Use guardralls on both sides of upper bunk.  • Prohibit norselay on or under bed(s).  • Prohibit norselay on or under bed(s).  • Prohibit more than one person on upper bunk.  STRANGULATION HAZARD — Never attach or hang items to any part of the bunk bed that are not designed for use with the bed; for example, but not limited to, hooks, belts, and jumpropes.  DO NOT REMOVE THIS LABEL	NA	
0.2.1.2	shown in either Fig. 10(c) or Fig. 10 the inside of a bed end structure	O(d) shall be attached permanently to of the upper bunk in a location that g but that may be covered by the		
	To help prevent serious or fatal injuries from entrapment or falls:  Never allow a child under 6 years on upper bunk.  Use only mattress which is 74"-75" long and 371/5"-381/5" wide on upper bunk.  Ensure thickness of mattress does not exceed "and the state of upper bunk.  Use guardrails on both sides of upper bunk.  Prohibit horseplay on or under bed(s).  Prohibit horseplay on or under bed bunk.  STRANGULATION HAZARD — Never attach or hang items to any part of the bunk bed that are not designed for use with the bed; for example, but not limited to, hooks, belts, and jumpropes.	To help prevent serious or fatal injuries from entrapment or falls:  Never allow a child under 6 years on upper bunk. Use only mattress meeting the following specifications on upper bunk: Bed Type Length Width Standard Length 74"-75" 37"1/s"-38"1/s" Extra Long 79"-80" 37"1/s"-38"1/s"  Extra Long 19"-80" 37"1/s"-38"1/s"  Ensure thickness of mattress does not exceed go quardrails Use guardrails on both sides of upper bunk. Prohibit horseplay on or under bed(s). Prohibit more than one person on upper bunk. STRANGULATION HAZARD — Never attach or hang items to any part of the bunk bed that are not designed for uses with the bed; for example, but not limited to, hooks, belts, and jumpropes.		
	(c)	(d)		



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6.2.2	The height of the letters of the word "WARNING":0.21in. (R: >0.1875 in. (4.8 mm) and uppercase boldface type.)	Р	
	The height of the letters of the word "DO NOT REMOVE THIS LABEL":in. (R: >0.125 in. (3.175mm) and uppercase boldface type.)		
	The height of the words "To help prevent":0.14in. (R: >0.125 in. (3.175mm) and boldface type.)		
	The height of the remainder of the text in warning statement:0.14in. (R: >0.125 in.(3.175mm))		
	The label contains sizes appropriate to that mattress as defined in the ISPA Voluntary Dimensional Guideline for Bedding Products and Components. <b>Yes</b>		
	The label is attached to the inside of a bed end structure of the upper bunk. <b>Yes</b>		
	The label is not covered by the bedding. <b>Yes</b> (Exception: it may be covered by the placement of a pillow.)		
6.2.3	Do warnings, including applicable mattress dimensional specifications, appear on the carton containing bed ends on at least one face and one end? <b>Yes</b>	Р	
	The height of the letters:0.19in. (R: >0.1875 in.(4.8mm))		
6.3	Do the permanent labels (section 6.1) meet the requirement of section 5.10? <b>Yes</b>	Р	
	Do warning labels (section 6.2.1) applied to the bed meet the requirement of section 5.10? <b>Yes</b>		
7 Instructi	onal Literature		
7.1	Is the instruction provided with the bed? Yes	Р	
7.2	Are all parts necessary to assemble the bunk bed set listed? Yes	Р	
	Are the tools necessary for the bunk bed assembly listed as well? Yes		



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7.3		embly instruction containing <b>detail</b> should be assembled? <u>Yes</u>	diagram showing ex	xactly	Р	
	It contains the	specific instructions pertaining to	the following:			
		Bed end structures	<u>Yes</u>			
		Attachment of side rails	<u>Yes</u>			
		nstallation of the mattress/ foundation support system	Yes			
	7.3.4 I	it of upper bunk to lower bunk	<u>Yes</u>			
	7.3.5	Attachment of guardrail	Yes			
	7.3.6	Attachment of ladder	Yes			
7.4	Is the size of t	the intended mattress clearly state	ed? <u>Yes</u>		Р	
	*Conventiona other: FULL	l Bedding term: <u>./<b>TWIN</b></u>				
	*Dimensions to Upper bed: Lower bed:	for finished mattress: 74-75" (length) <b>x</b> 53-1/4' 74-75" (length) <b>x</b> 38-1/2'				
		um thickness of the mattress that		nance		
7.5		nt parts information present? Yes			Р	
7.6	Does the inst	ruction contain the Safety Warni	ngs as per section 7	7.6.1-	Р	
7.6.1		ormation on the warnings appeari on the carton. Do not remove wa			Р	<ul><li>✓ Provided</li><li>✓ Not Provided</li></ul>
7.6.2	Alwavs use th	ne recommended size mattresses	s or mattress suppor	ts. or	P	☑ Provided
		prevent the likelihood of entrapme		,	·	☐ Not Provided
7.6.3		ttress must be at least 5 in. (127 r	nm) below the upper	edge	Р	☑ Provided
	of guardrails.					☐ Not Provided
7.6.4	Do not allow o	children under 6 years of age to u	se the upper bunk.		Р	☑ Provided
						☐ Not Provided
7.6.5		check and ensure that the gua			Р	☑ Provided
	components a connectors ar	are in their proper position, free f e tight.	rom damage, and th	nat all		☐ Not Provided
7.6.6		norseplay on or under the bed ar	nd prohibit jumping o	n the	Р	☑ Provided
	bed.					☐ Not Provided
7.6.7	Always use th	e ladder for entering and leaving	the upper bunk.		Р	☑ Provided
						☐ Not Provided
7.6.8		substitute parts. Contact the ma	anufacturer or deale	er for	Р	☑ Provided
	replacement p	parts.				☐ Not Provided





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7.6.9	Use of a night light may provide added safety precaution for a child using	Р	☑ Provided
	the upper bunk.		☐ Not Provided
7.6.10	Always use guardrails on both long sides of the upper bunk. If the bunk	Р	☑ Provided
	bed will be placed next to the wall, the guardrail that runs the full length of the bed should be placed against the wall to prevent entrapment between the bed and wall.		☐ Not Provided
7.6.11	The use of water or sleep flotation mattresses is prohibited.	Р	☑ Provided
			☐ Not Provided
7.6.12	STRANGULATION HAZARD-Never attach or hang items to any part of	Р	☑ Provided
	the bunk bed that are not designed for use with the bed; for example, but not limited to, hooks, belts and jump ropes.		☐ Not Provided
7.6.13	Keep these instructions for future reference.	Р	☑ Provided
			☐ Not Provided

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### 2. 16 CFR Part 1213 Safety Standard For Entrapment Hazards In Bunk Beds

Clause	Requirement	Rating	Notes
1213.3	Requirements		
1213.3(a)	Guardrails		
	Any bunk bed shall provide at least two guardrails, at least one on each side of the bed, for each bed having the underside of its foundation more than 30 inches (760 mm) from the floor.	Р	
	One guardrail shall be continuous between each of the bed's end structures. "Continuous" means that any gap between the guardrail and end structure shall not exceed 0.22 inches (5.6mm) (so as to not cause a finger entrapment hazard for a child).	Р	
	The other guardrail may terminate before reaching the bed's end structures, providing there is no more than 15 inches (380mm) between either end of the guardrail and the nearest bed end structures.	Р	
	For bunk beds designed to have a ladder attached to one side of the bed, the continuous guardrail shall be on the other side of the bed.	Р	
	Guardrails shall be attached so that they cannot be removed without either intentionally releasing a fastening device or applying forces sequentially in different directions.	Р	
	The upper edge of the guardrails shall be no less than 5 inches (130 mm) above the top surface of the mattress when a mattress of the maximum thickness specified by the bed manufacturer's instructions is on the bed.	_	
	This requirement does not prohibit a wall-side guardrail that terminates in a quarter-circle bend and attaches to the side rail of the upper bunk foundation.	Р	
	With no mattress on the bed, there shall be no openings in the structure between the lower edge of the uppermost member of the guardrail and the underside of the upper bunk's foundation that would permit passage of the wedge block of this part when tested in accordance with the procedure at §1213.4(a).	Р	



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Clause	Requirement	Rating	Notes
1213.3(b)	Bed end structures.		
	The upper edge of the upper bunk end structures shall be at least 5 inches (130 mm) above the top surface of the mattress for at least 50 percent of the distance between the two posts at the head and foot of the upper bunk when a mattress and foundation of the maximum thickness specified by the manufacturer's instructions is on the bed.	Р	
	With no mattress on the bed, there shall be no openings in the end structures above the foundation of the upper bunk that will permit the free passage of the wedge block when tested in accordance with the procedure at § 1213.4(b).	Р	
	When tested in accordance with § 1213.4(c), there shall be no openings in the end structures between the underside of the foundation of the upper bunk and upper side of the foundation of the lower bunk that will permit the free passage of the wedge block, unless the openings are also large enough to permit the free passage of a 9 inch (230 mm) diameter rigid sphere.	Р	
	All portions of the boundary of any opening required by §§ 1213.4(c)(1) and (2) to be probed by the wedge block, and that permits free passage of a 9-inch diameter sphere, must conform to the neck entrapment requirements of § 1213.4(c)(3).	Р	
1213.5	Marking and labeling.		
1213.5(a)	There shall be a permanent label or marking on each bed stating the name and address (city, state, and zip code) of the manufacturer, distributor, or retailer; the model number; and the month and year of manufacture.	Р	
1213.5(b)	The following warning label shall be permanently attached to the inside of an upper bunk bed end structure in a location that cannot be covered by the bedding but that may be covered by the placement of a pillow.		
	△ WARNING		
	To help prevent serious or fatal injuries from entrapment or falls:  • Never allow a child under 6 years on upper bunk	Р	
	Use only a mattress that is inches long and inches wide on upper bunk		
	Ensure thickness of mattress and foundation combined does not exceed inches and that mattress surface is at least 5 inches below upper edge of guardrails		
	DO NOT REMOVE THIS LABEL		





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Clause	Requirement	Rating	Notes
1213.6	Instructions.	Р	
	Instructions shall accompany each bunk bed set, and shall include the following information.		
1213.6(a)	Size of mattress and foundation.	Р	
	The length and width of the intended mattress and foundation shall be clearly stated, either numerically or in conventional terms such as twin size, twin extra-long, etc. In addition, the maximum thickness of the mattress and foundation required for compliance with § 1213.3(a)(5) and (b)(1) shall be stated.		
1213.6(b)	Safety warnings The instructions shall provide the following safety warnings:	Р	
	Do not allow children under 6 years of age to use the upper bunk.	Р	
	Use guardrails on both sides of the upper bunk.	Р	
	Prohibit horseplay on or under beds.	Р	
	Prohibit more than one person on upper bunk.	Р	
	Use ladder for entering or leaving upper bunk.	Р	
	If the bunk bed will be placed next to a wall, the guardrail that runs the full length of the bed should be placed against the wall to prevent entrapment between the bed and the wall.	Р	
	This applies only to bunk beds without two full-length guardrails.		

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### 3. 16 CFR Part 1513-Requirements For Bunk Beds

Clause	Requirement	Rating	Notes
	equirements.		
(a) Guard			
(1)	Any bunk bed shall provide at least two guardrails, at least one on each side of the bed, for each bed having the underside of its foundation more than 30 inches (760 mm) from the floor.	Р	
(2)	One guardrail shall be continuous between each of the bed's end structures. "Continuous" means that any gap between the guardrail and end structure shall not exceed 0.22 inches (5.6 mm) (so as to not cause a finger entrapment hazard for a child).	Р	
(3)	The other guardrail may terminate before reaching the bed's end structures, providing there is no more than 15 inches (380 mm) between either end of the guardrail and the nearest bed end structure.	Р	
(4)	For bunk beds designed to have a ladder attached to one side of the bed, the continuous guardrail shall be on the other side of the bed.	Р	
(5)	Guardrails shall be attached so that they cannot be removed without either intentionally releasing a fastening device or applying forces sequentially in different directions.	Р	
(6)	The upper edge of the guardrails shall be no less than 5 inches (130 mm) above the top surface of the mattress when a mattress of the maximum thickness specified by the manufacturer's instructions is on the bed. This requirement does not prohibit a wall-side guardrail that terminates in a quartercircle bend and attaches to the side rail of the upper bunk foundation.	Р	
(7)	With no mattress on the bed, there shall be no openings in the structure between the lower edge of the uppermost member of the guardrail and the underside of the upper bunk's foundation that would permit passage of the wedge block shown in Figure 1 of this part when tested in accordance with the procedure at § 1513.4(a).	Р	
(b) Bed e	and structures.		
(1)	The upper edge of the upper bunk end structures shall be at least 5 inches (130 mm) above the top surface of the mattress for at least 50 percent of the distance between the two posts at the head and foot of the upper bunk when a mattress and foundation of the maximum thickness specified by the manufacturer's instructions is on the bed.	Р	
(2)	With no mattress on the bed, there shall be no openings in the rigid end structures above the foundation of the upper bunk that will permit the free passage of the wedge block shown in Figure 1 when tested in accordance with the procedure at § 1513.4(b).	Р	
(3)	When tested in accordance with § 1513.4(c), there shall be no openings in the end structures between the underside of the foundation of the upper bunk and upper side of the foundation of the lower bunk that will permit the free passage of the wedge block shown in Figure 1, unless the openings arealso large enough to permit the free passage of a 9-inch (230-mm) diameter rigid sphere.	Р	
(4)	All portions of the boundary of any opening required by §§ 1513.4(c)(1) and (2) to be probed by the wedge block of Figure 1, and that permits free passage of a 9-inch diameter sphere, must conform to the neck entrapment requirements of § 1513.4(c)(3).	Р	



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Clause	Requirement	Rating	Notes
1513.5 M	arking and labeling		
(a)	There shall be a permanent label or marking on each bed stating the name and address (city, state, and zip code) of the manufacturer, distributor, or retailer; the model number; and the month and year of manufacture.	Р	
(b)	The following warning label shall be permanently attached to the inside of an upper bunk bed end structure in a location that cannot be covered by the bedding but that may be covered by the placement of a pillow.	Р	
	△ WARNING		
	To help prevent serious or fatal injuries from entrapment or falls:		
	Never allow a child under 6 years on upper bunk		
	Use only a mattress that is inches long and inches wide on upper bunk		
	Ensure thickness of mattress and foundation combined does not exceed inches and that mattress surface is at least 5 inches below upper edge of guardrails		
	DO NOT REMOVE THIS LABEL		
1513.6 ln	structions Instructions shall accompany each bunk bed set, and shall in	clude the foll	owing information.
(a)	Size of mattress and foundation.  The length and width of the intended mattress and foundation shall be clearly stated, either numerically or in conventional terms such as twin size, twin extra-long, etc. In addition, the maximum thickness of the mattress and foundation required for compliance with § 1513.3 (a)(5) and (b)(1) of this part shall be stated.	Р	
(b)	Safety warnings. The instructions shall provide the following safety warnings:		
(1)	Do not allow children under 6 years of age to use the upper bunk.	Р	
(2)	Use guardrails on both sides of the upper bunk.	Р	
(3)	Prohibit horseplay on or under beds.	Р	
(4)	Prohibit more than one person on upper bunk.	Р	
(5)	Use ladder for entering or leaving upper bunk.	Р	
(6)	If the bunk bed will be placed next to a wall, the guardrail that runs the full length of the bed should be placed against the wall to prevent entrapment between the bed and the wall. (This applies only to bunk beds without two full-length guardrails.)	Р	

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### 4. Sharp Point, Sharp Edges

TEST METHOD	TEST REQUIREMENT	RESULT
Hazardous sharp	There shall be no hazardous sharp edges as defined by	
edges (16 CFR	16 CFR 1500.49 before or after testing to this	PASS
1500.49)	specification	
Hozordous sharp point	There shall be no hazardous sharp points as defined by	
Hazardous sharp point	16 CFR 1500.48 before or after testing to this	PASS
(16 CFR 1500.48)	specification	



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EXHIBIT(S):





**Exhibit 3** 





Model #: MF297907AAB/MF297908AAB Distributed by: GIGACLOUD TECHNOLOGY(USA) 18961 ARENTH AVENUE, CITY OF INDUSTRY, CA, 91748 PO: Manufactured: 09/2022



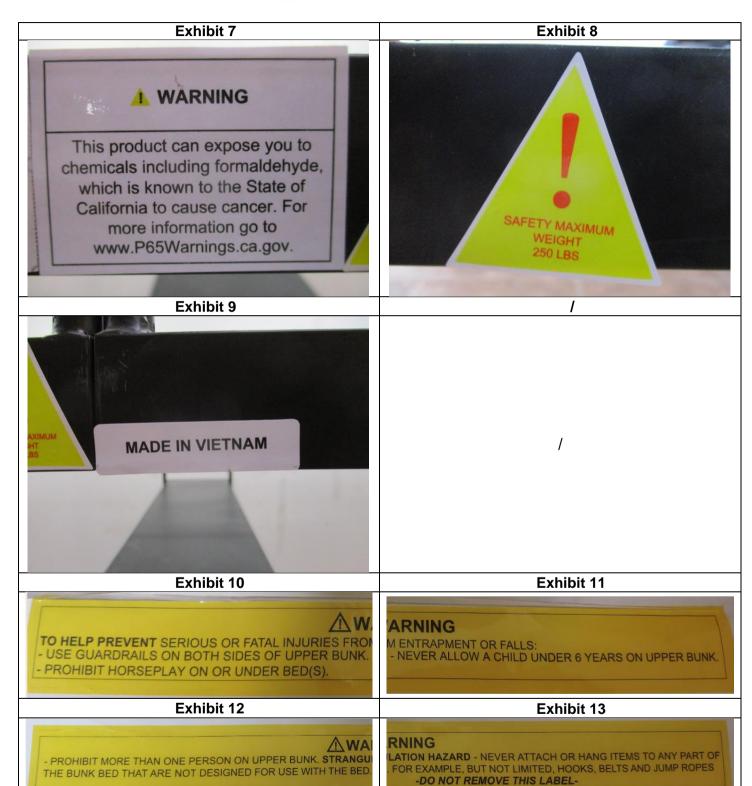
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#### **Eurofins MTS Consumer Product Testing Vietnam Ltd.**

Lot II-12, Street 19/5A, Tan Binh Industrial Park, Tay Thanh Ward, Tan Phu District, HCM City, Vietnam
Tel: (+84) 862896363 Fax: (+84) 862896262 Email: info@mtsvietnam.com.vn Website: www.mts-global.com



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SURFACE IS AT LEAST 5" BELOW UPPER EDGE OF GUARDRAILS

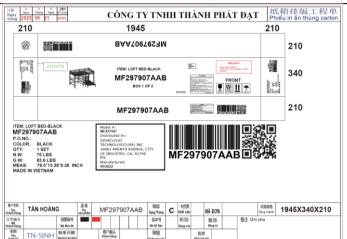
Exhibit 14

Exhibit 16



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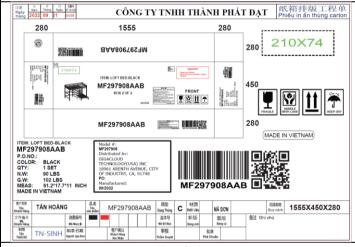
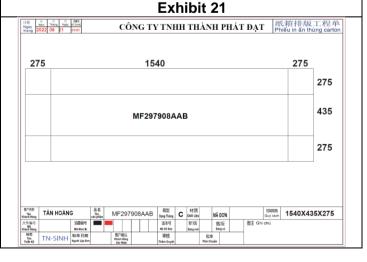


Exhibit 19

### Exhibit 20 ITEM: LOFT BED-BLACK Important MF297908AAB BOX 2 OF 2 WARNING olay on or under bed (s). ress which is 74" - 75" long; S3-1/2" wide,6" red and 74" - 75" long;38-1/2" wide. 8"thirs en one person on upper bunk. end - Never attach or hang items t



**Eurofins MTS Consumer Product Testing Vietnam Ltd.** 

Lot II-12, Street 19/5A, Tan Binh Industrial Park, Tay Thanh Ward, Tan Phu District, HCM City, Vietnam Tel: (+84) 862896363 Fax: (+84) 862896262 Email: info@mtsvietnam.com.vn Website: www.mts-global.com



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#### **NOTE:**

If there is question or concern regarding the above results, please contact the appropriate lab person below:

**Technical questions:** 

Primary Contact: Allen Hsu

Tel: +84-28-6289-6363 Ext: 127

Email: allenhsu@mts-global.com

Tel: +84-28-6289-6363 Ext: 175

Email: harryvu@mts-global.com

**Concerns About Billing and General Inquiries:** 

Primary Contact: Vincent Pham Tel: +84-28-6289-6363 Ext: 114 Email: vincentpham@mts-global.com

Back-up Contact: Wendy Do Tel: +84-28-6289-6363 Ext: 123 Email: wendydo@mts-global.com

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