

TEST REPORT

Jan. 20, 2025

LAB LOCATION: **REPORT NUMBER:** **VIET NAM**

EFFN24120508-CG-01

1 of 27

ISSUE DATE:

PAGE:

| Applicant: | GIGACLOUD TECHNOLOGY (USA) INC | | | |
|------------|---|------|---|--|
| Address: | 4388 SHIRLEY AVE, EL MONTE, CA 91731 | | | |
| Contact: | XĨN CẨM MÙI | | | |
| TEL: | 038 822 3938 | FAX: | - | |
| E-mail: | caigou mtn@gigacloudtech.com dafang.sp@gmail.com | | | |
| Сору То: | - | | | |

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

| Sample Information | | | | |
|-------------------------------|-------------------------------------|-------------------------------|-------------------------------------|--|
| Sample Description | FULL LOW LOFT BED V | VITH STAIR AND SHELF | | |
| Style Number | WF307238/ WF307239/ | WF307240 | | |
| SKU | - | | | |
| Vendor Name | - | | | |
| Vendor style number | - | | | |
| Quantity | 1 | PO Number | All PO | |
| Buyer's Name | GIGACLOUD TECHNOLOGY(USA) INC | Manufacturer | GIGACLOUD TECHNOLOGY(USA) INC | |
| Country of Origin | Viet Nam | Country of Destination | USA | |
| Code Number | - | Date of production | - | |
| Reference item/ style number | - | Color | Gray, White, Espresso | |
| Date of Submission | Dec. 30, 2024 | Test Performance Dates | Dec. 30, 2024 | |
| Testing Status | | | | |
| Pre-Shipment Lead Test | | Test for Protocol | - | |
| Retest | | Previous Report No.: - | | |



TEST REPORT

LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN24120508-CG-01

ISSUE DATE: Jan. 20, 2025

PAGE: 2 of 27

Sample Photo



EFFN24120508-CG-01

For and on behalf of

Eurofins MTS Consumer Product Testing Vietnam Ltd.

HARRY VU

HARDLINES LAB. ASSISTANT MANAGER





LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN24120508-CG-01

ISSUE DATE: Jan. 20, 2025

PAGE: 3 of 27

EXECUTIVE SUMMARY:

| TESTING RESULT SUMMARY | | | | | |
|---|------|------|------|----------|--|
| Test Property | PASS | FAIL | DATA | COMMENTS | |
| Total Lead Content in Paint or Similar Surface Coating | Х | - | - | - | |
| Total Lead Content - 15 U.S. Code §1278a | 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 | Χ | - | - | - | |





LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN24120508-CG-01

ISSUE DATE: Jan. 20, 2025

PAGE:

4 of 27

COMPONENT BREAKDOWN LIST:

| Test Item | Component Description |
|-----------|--|
| 01 | Silvery metal with golden plating (Allen head bolt) |
| 02 | Silvery metal with golden plating (Allen head bolt) (Same item 01) |
| 03 | Silvery metal with golden plating (Allen head bolt) |
| 04 | Silvery metal with golden plating (Allen head bolt) (Same item 03) |
| 05 | Silvery metal with golden plating (Allen head Screw) |
| 06 | Silvery metal with golden plating (Bolt - Knob) |
| 07 | Silvery metal with golden plating (Long Screw) |
| 08 | Silvery metal with golden plating (Short Screw) (Same item 07) |
| 09 | Silvery metal with golden plating (Cross dowel) |
| 10 | Silvery metal (Drawer slide) |
| 11 | Silvery metal (Wheel caster) |
| 12 | White plastic (Wheel caster) |
| 13 | Silvery metal (Rivet - Wheel caster) |
| 14 | Natural wood |
| 15 | Plywood |
| 16 | Particle board |
| 17 | White coating on wood (Bunk bed) (Color panel was tested) |
| 18 | White paper with black printing with glue backing and transparent plastic laminate (Label) |
| 19 | Gray coating on wood (Bunk bed) (Color panel was tested) |
| 20 | Espresso coating on wood (Bunk bed) (Color panel was tested) |
| 21 | MDF wood |

Remark:

- (1) Test result was transferred from report# 76124-020295 Revised 2.
- (2) Test result was transferred from report# 76124-090443 Revised 1.
- (3) Test result was transferred from report# 76124-011448.
- (4) Test result was transferred from report# 76124-050180.
- (5) Test result was transferred from report# 76124-010130 Revised 2.



TEST REPORT

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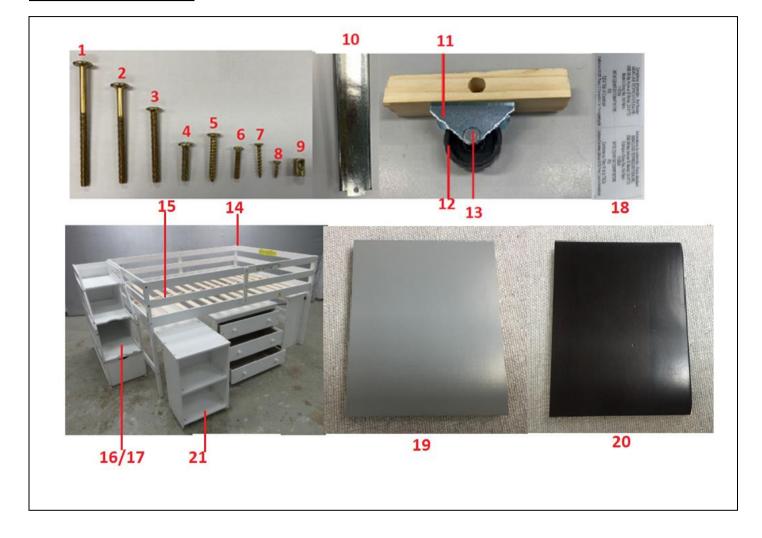
VIET NAM

EFFN24120508-CG-01

ISSUE DATE: Jan. 20, 2025

PAGE: 5 of 27

EXHIBIT BREAKDOWN:







LAB LOCATION: VIET NAM ISSUE DATE: Jan. 20, 2025

REPORT NUMBER: EFFN24120508-CG-01 PAGE: 6 of 27

TEST RESULT(S):

1. <u>Total Lead Content in Paint or Similar Surface Coating – U.S. CPSC 16 CFR 1303 and U.S. Consumer Product Safety Improvement Act of 2008 (CPSIA), Title I, Section 101</u>

Test Method: CPSC-CH-E1003-09.1. Analysis was performed by ICP-OES/ ICP-MS.

| To at Itam | Total Lead | Conclusion | |
|-------------------|------------|------------|------------|
| Test Item | Result | Limit | Conclusion |
| 17 ⁽¹⁾ | ND | 90 | PASS |
| 19 ⁽¹⁾ | ND | 90 | PASS |
| 20(1) | ND | 90 | PASS |

Note: ND = Not Detected (Lab reporting limit: 10 ppm)

ppm = part per million = mg/kg = milligram per kilogram

2. Total Lead Content - 15 U.S. Code §1278a

| To at Itama | Accessibility (#) Classification | Total Lead (Pb) (ppm) | | O a malausia m | |
|-------------------|----------------------------------|----------------------------------|--------|----------------|------------|
| Test Item | Accessibility (#) | Classification | Result | Limit | Conclusion |
| 01 ⁽³⁾ | Accessible as received | Accessible substrate | ND | 100 | PASS |
| 03(3) | Accessible as received | Accessible substrate | ND | 100 | PASS |
| 05 ⁽⁵⁾ | Accessible as received | Accessible substrate | ND | 100 | PASS |
| 06(2) | Accessible as received | Accessible substrate | ND | 100 | PASS |
| 07(5) | Accessible as received | Accessible substrate | ND | 100 | PASS |
| 09(3) | Accessible as received | Accessible substrate | ND | 100 | PASS |
| 10 ⁽²⁾ | Accessible as received | Accessible substrate | ND | 100 | PASS |
| 11 ⁽⁴⁾ | Accessible as received | Accessible substrate | ND | 100 | PASS |
| 12 ⁽⁴⁾ | Accessible as received | Accessible substrate | NA | 100 | NA |
| 13 ⁽⁴⁾ | Accessible as received | Accessible substrate | ND | 100 | PASS |
| 14 | Accessible as received | Accessible substrate | ND | 100 | PASS |
| 15 ⁽³⁾ | Accessible as received | Accessible substrate | ND | 100 | PASS |
| 16 ⁽⁴⁾ | Accessible as received | Accessible substrate | ND | 100 | PASS |
| 17 ⁽¹⁾ | Accessible as received | Paint or similar surface coating | ND | 90 | PASS |
| 18 ⁽³⁾ | Accessible as received | Accessible substrate | ND | 100 | PASS |
| 19 ⁽¹⁾ | Accessible as received | Paint or similar surface coating | ND | 90 | PASS |
| 20(1) | Accessible as received | Paint or similar surface coating | ND | 90 | PASS |
| 21 ⁽⁴⁾ | Accessible as received | Accessible substrate | ND | 100 | PASS |

Method:

The test is conducted according to the US CPSC Standard Operating Procedure for Determining Lead (Pb) in Paint and Other Similar Surface Coatings, February 25, 2011 (CPSC-CH-E1003-09.1)

2) Lead in metals:

The test is conducted according to the US CPSC Standard Operating Procedure for Determining Total Lead (Pb) in Children's Metal Products (Including Children's Metal Jewelry), November 15, 2012 (CPSC-CH-E1001-08.3)

Eurofins MTS Consumer Product Testing Vietnam Ltd.

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¹⁾ Lead in paint and other similar surface coatings:





LAB LOCATION: VIET NAM ISSUE DATE: Jan. 20, 2025

REPORT NUMBER: EFFN24120508-CG-01 PAGE: 7 of 27

3) Lead in other non-metal materials including plastics, glass and leather material: The test is conducted according to the US CPSC Standard Operating Procedure for Determining Total Lead (Pb) in Non-Metal Children's Products, November 15, 2012 (CPSC-CH-E1002-08.3)

Note: ND = Not Detected (Lab reporting limit: 10 ppm)

NA = Not applicable

ppm = part per million = mg/kg = milligram per kilogram

Remark:

#: The accessibility of the submitted sample is verified according to 16 CFR 1500.87 (e) before and after abuse.





LAB LOCATION: VIET NAM ISSUE DATE: Jan. 20, 2025 REPORT NUMBER: EFFN24120508-CG-01 PAGE: 8 of 27

3. ASTM F1427 - 21e1 Standard Consumer Safety Specification For Bunk Beds

| 4.1.1 All vertical 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 316 in. (4.8 mm) above the upper edge of the adjacent surface. Ladder stiles (uprights) shall not extend more than 316 in. (4.8 mm) at overtical protrusion alove the upper edge of the adjacent surface. Any cap used along the top surface of the upper bunk shall not have a vertical protrusion above the upper edge of the adjacent surface. If the cap is flush with or overhangs the edge of the eagle-cent surface. If the cap is flush with or overhangs the edge of the experiment 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 316 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 116 in. (2 mm). The cap shall have a maximum height of into more than 20% of the width or diameter of the cap. At no point shall the cap overhang the post more than 116 in. (2 mm). The cap 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 disengagement of the top bed from the bottom bed shall be 1,25in., or a fastening mechanism may be used that will prevent the disengagement of the top bed from the bottom beds of the mattress and foundation that will permit complete passage of the wedge block when tested in accordance with 5.2. 4.4.4 Mattress Size and Fit (Lower Foundation): There shall be no space, belween the edge of the manufacturer's recommended mattress and the interior boundary of any component(s) attached to lower boundation Support Systems: 4.5.1 The foundation support Systems shall confine the horizontal position of the mattress and the fou | Clause | Requirement | Rating | Notes | | | |
|--|-------------|---|--------|---|--|--|--|
| 4.1.1 All vertical protrusions along the top inside surfaces of any individual component (including but not limited to beed end structures and guard rails) of the upper bunk shall not extend more than 346 in. (4.8 mm) above the upper edge of the adjacent surface. Ladder stiles (upights) shall not extend more than 376 in. (4.8 mm) above the upper edge of the adjacent surface. 4.1.2 Any cap used along the top surface of the upper bunk shall not have a vertical protrusion greater than 376 in. (4.8 mm) at the edge of the post into the upper edge of the adjacent surface. If the cap is little with the upper edge of the adjacent surface if the cap is little with the upper edge of the adjacent surface. If the cap is little with the upper edge of the adjacent surface if the cap is little with the upper edge of the post of the upper edge of the post protrusion, to making the edge of the portions of shall not exceed 378 in. (4.8 mm) at the edge of protrusion, the making we write protrusion shall not exceed 378 in. (4.8 mm) at the edge of the upper edge of the top bed from the bottom bed shall be 1.25 in., or a fastening mechanism may be used that will prevent the disengagement of the top bed from the bottom bed. 4.3 Matress and Foundation Size and Fit (Top Bed): There shall be no gaps between the interior bed structure and the edges of the matriess and foundation that will permit complete passage of the wedge block when tested in accordance with 5.3. 4.5.1 The foundation support Systems shall confine the horizontal position of the venture of the foundation and shall prohibit the mattress and foundation from falling when the mattress or foundation is manipulated. | | 4 Performance Requirements: | | | | | |
| 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. 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 helph 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 comer post. 4.2 Fit of Top Bed to Bottom Bed: 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 disengagement of the top bed from the bottom bed shall be 1.25in, or a fastening mechanism may be used that will prevent the disengagement of the top bed from the bottom bed shall be wedge block when tested in accordance with 5.2. 4.4 Mattress and Foundation Size and Fit (Top Bed): 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. 4.5 Upper and Lower Foundation Support Systems: 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. 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 dista | 4.1 Vertica | al Protrusions: | | | | | |
| 4.1.2 Any cap used along the top surface of the upper bunk shall not have a vertical 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 3716 in. (4.8 mm). The cap shall have a maximum height of no more than 20% of the width or diameter of the eap. At no point shall the cap overhang the post more than 176 in. (2 mm). The cap shall fit flush with the top of the corner post. 4.2 Fit of Top Bed to Bottom Bed: 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 disengagement of the top bed from the bottom bed shall be 1.25in., or a fastening mechanism may be used that will prevent the disengagement of the top bed from the bottom bed. 4.3 Mattress and Foundation Size and Fit (Top Bed): 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): 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 1.86 in. (48 mm) and smaller than 9 in. (229 mm), when tested in accordance with 5.3. 4.5.1 The foundation support systems: 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 are utilized, they shall be spaced of the wedge block or will allow complete passage of the wedge block and the 9 in. (229 mm) diameter rigid sphere when tested in accordance with 5.9. 4.5.3 The foundation support system shall not be capable of being dislodge | 4.1.1 | 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) | Р | 0.17in. Position: corner post. ☑ Ladder stiles:0.16 | | | |
| vertical protrusion greater than 3/16 in. (4.8 mm) at the edge of the aprotrusion 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. 4.2 Fit of Top Bed to Bottom Bed: 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 disengagement of the top bed from the bottom bed. 4.3 Mattress and Foundation Size and Fit (Top Bed): 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): 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 1.86 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 shall confine the horizontal position of the mattress and the foundation and shall prohibit the mattress and foundation from falling when the mattress of foundation is manipulated. 4.5.2 In the event cross-members are utilized, a minimum of two per bed are required. If more than two 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 the vedge block or will allow complete passage of the vedge block or will allow complete passage of the vedge block or will allow complete passage of the v | | above the upper edge of the adjacent surface. | | 111. | | | |
| 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 disengagement of the top bed from the bottom bed. 4.3 Mattress and Foundation Size and Fit (Top Bed): 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): 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: 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. 4.5.1 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. The foundation support system shall not be capable of being dislodged without the release of positive fastening devices or the use of hand tools. The foundation support system shall not fail when tested in accordance with 5.4. | 4.1.2 | 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 | NA | W:in. (H _{max} = 20%W) | | | |
| 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 disengagement of the top bed from the bottom bed. 4.3 Mattress and Foundation Size and Fit (Top Bed): 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): 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: 4.5.1 The foundation support systems shall confine the horizontal position of the mattress and the foundation at shall prohibit the mattress and foundation from falling when the mattress or foundation is manipulated. 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. The foundation support system shall not be capable of being dislodged without the release of positive fastening devices or the use of hand tools. The foundation support system shall not fail when tested in accordance with 5.4. | 4.2 | Fit of Top Bed to Bottom Bed: | NA | | | | |
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| 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. Mattress Size and Fit (Lower Foundation): 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. The foundation Support Systems: 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. 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. The foundation support system shall not be capable of being dislodged without the release of positive fastening devices or the use of hand tools. The foundation support system shall not fail when tested in accordance with 5.4. | | | | ☑ Bed post no separate | | | |
| 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): 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: 4.5.1 The foundation support systems shall confine the horizontal position of the mattress and foundation from falling when the mattress or foundation is manipulated. 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. 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. 4.5.4 The foundation support system shall not fail when tested in accordance with 5.4. | 4.3 | Mattress and Foundation Size and Fit (Top Bed): | 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: 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. 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. The foundation support system shall not be capable of being dislodged without the release of positive fastening devices or the use of hand tools. The foundation support system shall not fail when tested in accordance with 5.4. | | of the mattress and foundation that will permit complete passage of the | | | | | |
| 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: 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. 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. 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. The foundation support system shall not fail when tested in accordance with 5.4. | 4.4 | Mattress Size and Fit (Lower Foundation): | NA | | | | |
| 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. 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. The foundation support system shall not be capable of being dislodged without the release of positive fastening devices or the use of hand tools. The foundation support system shall not fail when tested in accordance with 5.4. | | 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 | | | | | |
| the mattress and the foundation and shall prohibit the mattress and foundation from falling when the mattress or foundation is manipulated. 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. 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. The foundation support system shall not fail when tested in accordance with 5.4. | 4.5 Upper | and Lower Foundation Support Systems: | | | | | |
| 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. The foundation support system shall not be capable of being dislodged without the release of positive fastening devices or the use of hand tools. The foundation support system shall not fail when tested in accordance with 5.4. P | 4.5.1 | the mattress and the foundation and shall prohibit the mattress and | Р | | | | |
| without the release of positive fastening devices or the use of hand tools. 4.5.4 The foundation support system shall not fail when tested in accordance with 5.4. | 4.5.2 | 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 | Р | -Slat to slat: 3-1/8 inSlat to Bed end structure: 3 in. Lower foundation: -Slat to slat: inSlat to Bed end structure: | | | |
| with 5.4. | 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 | | | | |
| 4.6 Side Rails: | 4.5.4 | | P | | | | |
| | 4.6 Side F | ails: | | • | | | |

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TEST REPORT

LAB LOCATION:

VIET NAM

ISSUE DATE:

Jan. 20, 2025

REPORT NUMBER:

EFFN24120508-CG-01

PAGE: 9 of 27

| Clause | Requirement | Rating | Notes |
|-----------|---|--------|--------------------------------|
| 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 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: 2in. apart on their center. ($REQ: \ge 1.5in.$) | | |
| | When the bolts are fully tightened in the assembled bed, no more than 0.25 in. 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 | rails: | | |
| 4.7.1 | The underside of the foundation is:in. from the floor. (REQ: over 30 inches.) | Р | |
| | How many guardrail(s) accompany the bed:2_ | | |
| | (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? Yes | Р | |
| 4.7.3 | The upper edge of the guardrails is: <u>7-5/8</u> in. 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. ($REQ: \geq 5in.$) | 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 terminates 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: $\underline{0}$ in. $(R: \leq 15in.)$ | 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: $\phantom{aaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaaa$ | | |
| 4.8 Bed S | tructure: | | |



TEST REPORT

LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN24120508-CG-01

ISSUE DATE: Jan. 20, 2025

PAGE: 10 of 27

| Clause | Requirement | Rating | Notes |
|-----------|--|--------|----------------|
| 4.8.1 | The total distance between the two posts at the head of the upper bunk: 53_in. | Р | |
| | The distance between the two posts at the head of the upper bunk at 5 in above the sleeping surface:in. | | |
| | Percentage of that at the head: <u>100</u> % (R: ≥ 50%) | | |
| | The total distance between the two posts at the foot of the upper bunk: | | |
| | The distance between the two posts at the foot of the upper bunk at 5in above the sleeping surface:53_in. | | |
| | Percentage of that at the foot:100% (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. | NA | |
| 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. | NA | |
| 4.9 Ladde | ers: | | |
| 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 | | |



TEST REPORT

LAB LOCATION:

VIET NAM

ISSUE DATE:

Jan. 20, 2025

REPORT NUMBER:

EFFN24120508-CG-01

PAGE: 11 of 27

| 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 | Р | a A |
| | openings? Yes | | b |
| | Width of the ladder measured from the inside of the stiles:in. $(R: \ge 10in.)$ (a) | | |
| | Vertical spacing of ladder steps measured between steps: <u>12-1/4</u> in. (R: ≤12in.; if bed structure is used as ladders, vertical spacing ≤16in.) (b) | | |
| | Vertical spacing of ladder steps measured from the floor to the first step: | | |
| 4.9.3 | Are there openings between the ladder step and the upper bunk boundary that allow complete passage of the wedge block? No | Р | |
| | If Yes, does the 9 in. diameter rigid sphere pass freely through the openings? Yes/No | | |
| 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. | NA | Record:in. |
| 4.10 | Metal Beds: Frame and Fastenings: | NA | |
| | 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 | ethods: | | |
| 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 Yes , does the wedge block pass through the gap(s) as per section 4.3? No | | |
| 5.3 | Mattress Size and Fit—Lower Foundation | NA | |
| | 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)? No | | |
| 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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TEST REPORT

12 of 27

LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN24120508-CG-01

ISSUE DATE: Jan. 20, 2025

PAGE:

| 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? Yes | | |
| 5.7 Bed E | and 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 Yes | 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 | ver 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. | NA | |
| 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. | NA | |
| 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 | NA | |
| 50444 | If Yes , 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? * Yes/ No/ NA | | |
| | Beds- Frame and Fastenings: | | |
| 5.8.1- | Number of cycle/ | NA | |
| 5.8.1.1 | Number of loads per minute: | | |
| | (R: ≤24 loads per minute) | | |
| | 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/ No</u> | | |

Eurofins MTS Consumer Product Testing Vietnam Ltd.



TEST REPORT

LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN24120508-CG-01

ISSUE DATE: Jan. 20, 2025

PAGE: 13 of 27

| Clause | Requirement | Rating | Notes |
|-------------------|---|--------|---|
| 5.8.2 | Apply force at each point of attachment of the foundation support system to the end structure. | NA | |
| | 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/ No</u> | | |
| 5.9 | Are cross-members utilized? <u>Yes</u> | Р | |
| | If Yes , Number of cross-members per bed: Upper bunk bed14 & Lower bunk bed (R: ≥2) | | |
| | If More than 2 , 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? <u>No</u> | | |
| | If Yes , 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. | | |
| 5.10 Perm | nanency of Labels and Warnings | | |
| 5.10.1- 5.10.2 | It is a Paper 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? Yes/ No | 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? <u>Yes/ No</u> | NA | |
| | Is the printing in the area tested legible or attached after being subjected to this test? $\underline{\text{Yes/No}}$ | | |
| 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): GIGACLOUD TECHNOLOGY (USA) INC. 4388 Shirley Avenue El Monte, CA 91731 (2): WF307238 / WF307239 / WF307240 (3): 11/2024 |
| 6.2 | Warnings | | |

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TEST REPORT

LAB LOCATION:

VIET NAM

ISSUE DATE:

Jan. 20, 2025

REPORT NUMBER:

EFFN24120508-CG-01

PAGE: 14 of 27

| Requirement | | Rating | Notes |
|--|------------------------------|--------|-------|
| If the foundation is not an integral part of the bed structure label shown in either Fig. 10(a) or Fig. 10(b) shall permanently to the inside of a bed end structure of the ullocation that cannot be covered by the bedding but that m by the placement of a pillow. | l be attached pper bunk in a | 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 mattress which is 74"–75" long and 37½"–38½" wide on upper bunk. Ensure thickness of mattress and foundation combined does not exceed" and mattress is at least 5" below upper edge of guardrails. Use guardrails 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 | | | |
| | | | |
| (a) | | | |
| | | | |
| 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 Standard Length Standard Length Y"-75" Standard Length Standard Length Standard Length Y"-75" Standard Length Standard Length Tay"-381/2" Ensure thickness of mattress and foundation combined does not exceed "and mattress is at least 5" below upper edge of guardrails. Use guardrails 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 | | | |
| (b) | | | |



TEST REPORT

LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN24120508-CG-01

ISSUE DATE: Jan. 20, 2025

PAGE: 15 of 27

| Clause | Requirement | Rating | Notes |
|---------|---|------------------|-------|
| 6.2.1.2 | If the foundation is an integral part of the bed structure, the warnin shown in either Fig. 10(c) or Fig. 10(d) shall be attached permane the inside of a bed end structure of the upper bunk in a locatic cannot be covered by the bedding but that may be covered placement of a pillow. | ently to on that | |
| | △ warning | | |
| | 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 371/2"—381/2" wide on upper bunk. Ensure thickness of mattress does not exceed " and mattress is at least 5" below upper edge of guardrails. Use guardrails 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 | | |
| | (c) A warning | | |
| | 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" 371/2"-381/2" Extra Long 79"-80" 371/2"-381/2" Ensure thickness of mattress does not exceed ——————————————————————————————————— | | |
| | (d) | | |



TEST REPORT

LAB LOCATION:

VIET NAM

ISSUE DATE:

Jan. 20, 2025

REPORT NUMBER:

EFFN24120508-CG-01

PAGE: 16 of 27

| Clause | Requirement | Rating | Notes |
|-------------|--|--------|-------|
| 6.2.2 | The height of the letters of the word "WARNING":0.24in. (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":0.15in. (R: >0.125 in. (3.175mm) and uppercase boldface type.) | | |
| | The height of the words "To help prevent":0.15in. (R: >0.125 in. (3.175mm) and boldface type.) | | |
| | The height of the remainder of the text in warning statement:0.15in. (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. Yes | | |
| | The label is attached to the inside of a bed end structure of the upper bunk. <u>Yes</u> | | |
| | The label is not covered by the bedding. <u>Yes</u> (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? Yes | Р | |
| | The height of the letters: 0.2 in. (R: >0.1875 in.(4.8mm)) | | |
| 6.3 | Do the permanent labels (section 6.1) meet the requirement of section 5.10? <u>Yes</u> | Р | |
| | Do warning labels (section 6.2.1) applied to the bed meet the requirement of section 5.10? Yes | | |
| 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 | | |
| | | | |
| | | | |
| | | | |



TEST REPORT

LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN24120508-CG-01

ISSUE DATE:

PAGE:

Jan. 20, 2025

17 of 27

| Clause | Requirement | | Rating | Notes |
|--------|--|--|--------|----------------|
| 7.3 | Does the assembly instruction containing detail d how the bed should be assembled? Yes | iagram showing exactly | Р | |
| | It contains the specific instructions pertaining to t | he following: | | |
| | 7.3.1 Bed end structures | Yes | | |
| | 7.3.2 Attachment of side rails | <u>Yes</u> | | |
| | 7.3.3 Installation of the mattress/ foundation support system | <u>Yes</u> | | |
| | 7.3.4 Fit of upper bunk to lower bunk | <u>Yes</u> | | |
| | <u> </u> | <u>Yes</u> Yes | | |
| | 7.3.0 Attachment of lauder | res | | |
| 7.4 | Is the size of the intended mattress clearly stated | ? <u>Yes</u> | Р | |
| | *Conventional Bedding term: other: Full | | | |
| | *Dimensions for finished mattress: Upper bed: 74" – 75" (length) x 54" (width Lower bed: (length) x (width | | | |
| | Is the maximum thickness of the mattress that we to the guardrail provision of section 4.7.3 stated? | | | |
| 7.5 | Is replacement parts information present? Yes | | Р | |
| 7.6 | Does the instruction contain the Safety Warnings as per section 7.6.1-7.6.13? Yes | | Р | |
| 7.6.1 | Follow the information on the warnings appearing on the upper bunk end | | Р | ☑ Provided |
| | structure and on the carton. Do not remove warn | ing label from bed. | | ☐ Not Provided |
| 7.6.2 | | use the recommended size mattresses or mattress supports, or | | ☑ Provided |
| | both, to help prevent the likelihood of entrapment | or ialis. | | ☐ Not Provided |
| 7.6.3 | Surface of mattress must be at least 5 in. (127 mn | n) below the upper edge | Р | ☑ Provided |
| | of guardrails. | | | ☐ Not Provided |
| 7.6.4 | Do not allow children under 6 years of age to use | the upper bunk. | Р | ☑ Provided |
| | | | | ☐ Not Provided |
| 7.6.5 | Periodically check and ensure that the guard | rail, ladder, and other | Р | ☑ Provided |
| | components are in their proper position, free fro connectors are tight. | | | ☐ Not Provided |
| 7.6.6 | Do not allow horseplay on or under the bed and | prohibit jumping on the | Р | ☑ Provided |
| | bed. | | | ☐ Not Provided |
| 7.6.7 | Always use the ladder for entering and leaving th | e upper bunk. | Р | ☑ Provided |
| | | | | ☐ Not Provided |
| 7.6.8 | Do not use substitute parts. Contact the man | ufacturer or dealer for | Р | ☑ Provided |
| | replacement parts. | | | ☐ Not Provided |
| 7.6.9 | Use of a night light may provide added safety pre | caution for a child using | Р | ☑ Provided |
| | the upper bunk. | | 1 | ☐ Not Provided |

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TEST REPORT

LAB LOCATION: VIET NAM ISSUE DATE: Jan. 20, 2025 REPORT NUMBER: EFFN24120508-CG-01 PAGE: 18 of 27

| Clause | Requirement | Rating | Notes |
|--------|---|--------|---------------------------|
| 7.6.10 | Always use guardrails on both long sides of the upper bunk. If the bunk 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. | Р | ☑ Provided □ 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 the bunk bed that are not designed for use with the bed; for example, but not limited to, hooks, belts and jump ropes. | Р | ☑ Provided □ Not Provided |
| 7.6.13 | Keep these instructions for future reference. | Р | ☑ Provided □ Not Provided |

NOTE: P = Pass F = Fail NA = Not Applicable NR = Not Requested

NT = Not Tested





LAB LOCATION: VIET NAM ISSUE DATE: Jan. 20, 2025 REPORT NUMBER: EFFN24120508-CG-01 PAGE: 19 of 27

4. 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. | Р | |
| | 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. | | |
| | 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). | P | |
| 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. | NA | |
| | 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). | NA | |

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TEST REPORT

LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN24120508-CG-01

ISSUE DATE:

PAGE:

Jan. 20, 2025

20 of 27

| Clause | Requirement | Rating | Notes |
|-----------|--|--------|-------|
| 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. | 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 | | |
| 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: | | |
| | 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. | | |

NOTE:

P = Pass

NT = Not Tested

F = Fail

NA = Not Applicable

NR = Not Requested

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LAB LOCATION: VIET NAM ISSUE DATE: Jan. 20, 2025 REPORT NUMBER: EFFN24120508-CG-01 PAGE: 21 of 27

5. 16 CFR Part 1513-Requirements For Bunk Beds

| Clause | Requirement | Rating | Notes |
|-----------|---|--------|----------------|
| 1513.3 R | 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 | nd 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. | NA | |
| (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). | NA | |
| 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 | |
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TEST REPORT

LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN24120508-CG-01

ISSUE DATE:

Jan. 20, 2025

PAGE: 22 of 27

| Clause | | Requirement | Rating | Notes |
|-----------|---|---|---------------|---------------|
| (b) | of an upper bunk b | ing label shall be permanently attached to the inside sed end structure in a location that cannot be covered that may be covered by pillow. | Р | |
| | | △ WARNING | | |
| | To help prevent se | erious or fatal injuries from entrapment or falls: | | |
| | Never allow | a child under 6 years on upper bunk | | |
| | Use only a r wide on upp | nattress that is inches long and inches er bunk | | |
| | does not exc | ness of mattress and foundation combined ceed inches and that mattress surface is at below upper edge of guardrails | | |
| | | DO NOT REMOVE THIS LABEL | | |
| 1513.6 In | structions | Instructions shall accompany each bunk bed set, and information. | shall include | the following |
| (a) | clearly stated, either terms such as twir thickness of the ma | nd foundation. dth of the intended mattress and foundation shall be er numerically or in conventional a size, twin extra-long, etc. In addition, the maximum attress and foundation required for compliance with § b)(1) of this part shall be stated. | Р | |
| (b) | | The instructions shall provide the following safety | | |
| (1) | Do not allow childre | en 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 ente | ering or leaving upper bunk. | Р | |
| (6) | length of the bed sh | be placed next to a wall, the guardrail that runs the full nould be placed against the wall to prevent entrapment nd the wall. (This applies only to bunk beds without two ls.) | Р | |

NOTE:

P = Pass NT = Not Tested F = Fail

NA = Not Applicable

NR = Not Requested

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LAB LOCATION: VIET NAM ISSUE DATE: Jan. 20, 2025 REPORT NUMBER: EFFN24120508-CG-01 PAGE: 23 of 27

6. Sharp Point, Sharp Edges

| TEST METHOD | TEST REQUIREMENT | RESULT | |
|-----------------------|---|--------|--|
| Hazardous sharp edges | There shall be no hazardous sharp edges as defined by 16 | DACC | |
| (16 CFR 1500.49) | CFR 1500.49 before or after testing to this specification | PASS | |
| Hazardous sharp point | There shall be no hazardous sharp points as defined by 16 | D4.00 | |
| (16 CFR 1500.48) | CFR 1500.48 before or after testing to this specification | PASS | |



TEST REPORT

LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN24120508-CG-01

ISSUE DATE: Jan. 20, 2025

PAGE:

24 of 27

EXHIBIT(S):





Exhibit. 3



Exhibit. 4



Exhibit. 5







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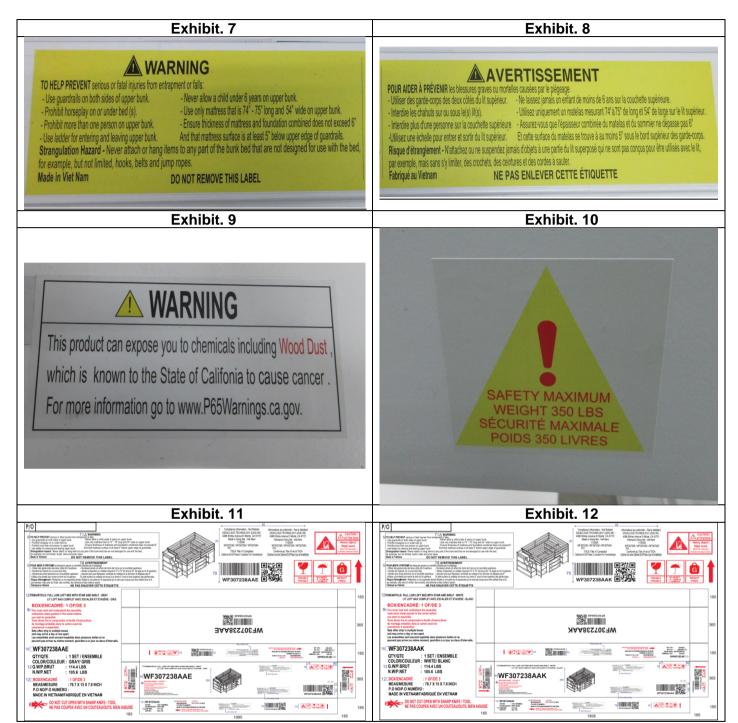
LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN24120508-CG-01

ISSUE DATE: Jan. 20, 2025

PAGE: 25 of 27



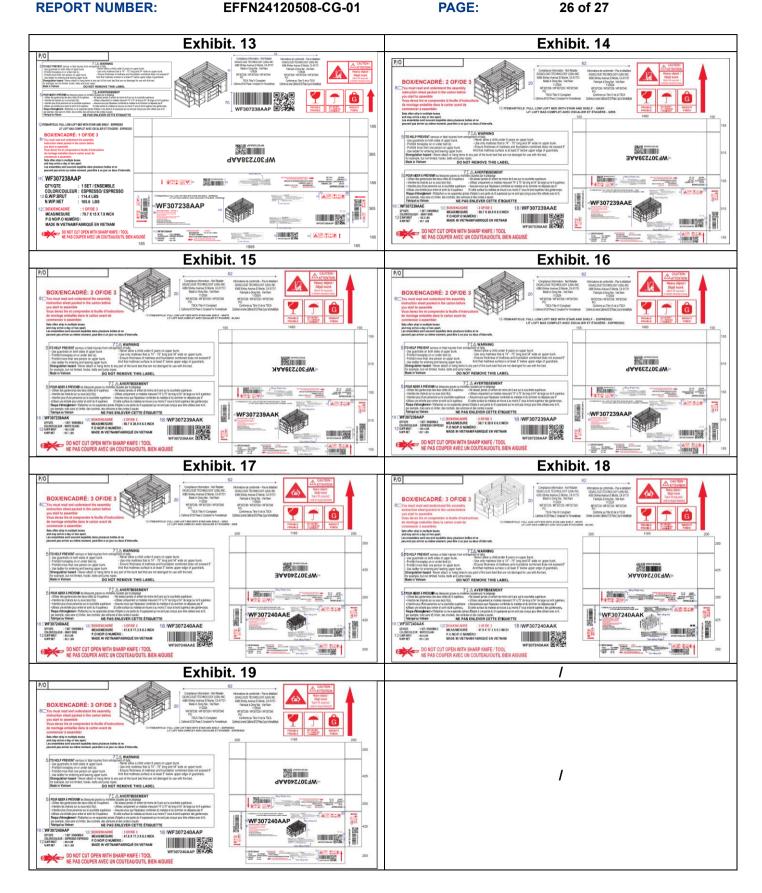
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TEST REPORT

LAB LOCATION: VIET NAM ISSUE

ISSUE DATE: Jan. 20, 2025



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LAB LOCATION: REPORT NUMBER:

VIET NAM

EFFN24120508-CG-01

ISSUE DATE: Jan. 20, 2025

PAGE: 27 of 27

NOTE:

The test results are considered as conform to specification based on the general consideration simple acceptance as stated in ISO/IEC GUIDE 98-4:2012.

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