CPSC Staff Retail Meeting July 19, 2007

This information has not been reviewed by, and may not necessarily reflect the views of, the Commission



Agenda

- Discussion of Standards
- Overview of the Open-Flame Standard
- Understanding Prototyping
- Retailer Responsibility
- Retail Surveillance

~

Question & Answer Session



The Standards

- Part 1632 addresses cigarette ignition risk
- Part 1633 addresses open flame ignition
 - Provides occupants additional time to discover & escape a fire



Compliance with the Standards

- All Mattresses and Mattress Sets manufactured, imported or renovated on or after July 1, 2007 must comply with 16 CFR § 1633, Standard for the Flammability (Open- Flame) of Mattress Sets.
- A mattress set is defined as:
 - Mattresses and foundations labeled for sale as a set
 - Mattresses labeled for sale without a foundation



- All mattresses and mattress sets will bear a label indicating that they meet the standard and whether they are intended for sale alone or with an intended foundation (the mattress label must indicate the appropriate foundation ID).
- Mattresses must continue to comply with 16 CFR § 1632, Standard for the Flammability of Mattresses and Mattress Pads.



Retailers:

- Responsible for selling compliant sets.
- May choose
 - to conduct testing of sets that they put together, or
 - obtain objectively reasonable criteria to pair mattresses and foundations that may not have been previously qualified.



Guaranty

- Guaranty issued under the FFA
 - From manufacturer to retailer guarantees that reasonable and representative tests, made in accordance with the Standard, show the product covered by the guaranty conforms to the Standard.
 - Forms available under 16 CFR § 1608.2 and 1608.3



Consumer Safety Pamphlet

Sleep Safer Pamphlet for retailers



Retail Surveillance

- How?
- When?
- · Why?



Additional Information

Mattress information on the CPSC website: www.cpsc.gov/businfo/mattress.html

Office of Compliance contact:

Heather Sonabend
hsonabend@cpsc.gov



Scope

- All mattress sets manufactured, imported or renovated on or after July 1, 2007
- Mattress set
 - · Mattress and foundation labeled for sale as a set
 - Mattress labeled for sale without foundation



The Standard's Performance Requirements

Objectives:

- Limit fire intensity
- Provide time for discovery and escape by preventing or delaying flashover

· Performance criteria:

- Max. 15 MJ total heat release in 1st 10 min.
- Max. 200 kW peak rate of heat release at anytime during 30 min. test



What Is a Prototype?

- "Prototype" means a specific design of mattress set that serves as a model for production units intended to be introduced into commerce and is the same as the production units with respect to materials, components, design and methods of assembly.
- Mattresses intended for sale with one or more foundations constitute separate prototypes from those intended for sale without a foundation.



Three Kinds of Prototypes

Qualified Prototype

Confirmed Prototype

Subordinate Prototype



Mfrs/Importer Recordkeeping

■ Test Records

Prototype Records

Pooling Records

Quality Assurance Records



Labeling Requirements

- Each mattress set must bear permanent, conspicuous, and legible label, to include the following in English
 - Manufacturer name
 - For imported mattress sets, importer <u>and</u> foreign manufacturer name
 - Manufacturer's complete physical address
 - For imported mattress sets, complete physical address of foreign manufacturer and U.S. importer (or location of records in U.S.)
 - Month and year of manufacture
 - Model identification
 - Prototype identification number



Labeling Requirements (cont'd)

- Certification that mattress complies with the Standard either with or without a designated foundation, or both
- Statement identifying whether the manufacturer intends the mattress set to be sold alone, with a foundation, or both
- The reverse side of the label may show same information in any other language



Labeling Requirements (cont'd)

- Label content must meet specified wording, type size, font and dimensional requirements
- The Standard limits the information allowed on the label
- Purpose of the Label
 - · Enable consumers to choose correct foundation, if any
 - Ensure that information is not detracted from or minimized
 - · Prevent potential confusion between State and Federal labeling
 - Facilitate compliance activities



Labels for Domestic Mattress with Foundation

Stitch Line

Manufactured by: Company Name Street City, State ZIP

Date of Manufacture: MM/YYYY

Model: <Model ID>

Prototype ID: <Prototype ID>

This mattress meets the requirements of 16 CFR §1633 (federal flammability (open flame) standard for mattress sets) when used with foundation <ID>.

THIS MATTRESS IS INTENDED TO BE USED WITH FOUNDATION(S):

< FOUNDATION ID>

Stitch Line

Manufactured by: Company Name Street City, State ZIP

Date of Manufacture: MM/YYYY

Model: <Model ID>

Prototype ID: <Prototype ID>

Foundation ID: <ID>

Foundation Label

Mattress Label



Labels for Imported Mattress with Foundation

Stitch Line

Manufactured by: Foreign Company Name Street City, State Country

Date of Manufacture: MM/YYYY

Importer/U.S. Records Location: Importer Name Street City, State ZIP

Model: <Model ID>

Prototype ID: <Prototype ID>

This mattress meets the requirements of 16 CFR §1633 (federal flammability (open flame) standard for mattress sets) when used with foundation <ID>.

THIS MATTRESS IS INTENDED TO BE USED WITH FOUNDATION(S):

< FOUNDATION ID>

Stitch Line

Manufactured by: Foreign Company Name Street City, State Country

Date of Manufacture: MM/YYYY

Importer/U.S. Records Location: Importer Name Street City, State ZIP Model: <Model ID>

Prototype ID: <Prototype ID>

Foundation ID: < ID>

Foundation Label



Mattress Label

Labels for Domestic and Imported Mattresses Alone

Stitch Line

Manufactured by: Company Name Street City, State

Date of Manufacture: MM/YYYY

Model: <Model ID>

Prototype ID: <Prototype ID>

This mattress meets the requirements of 16 CFR §1633 (federal flammability (open flame) standard for mattress sets) when used without a foundation

THIS MATTRESS
IS INTENDED TO BE USED
WITHOUT A FOUNDATION

Domestic Mattress

Stitch Line

Manufactured by: Foreign Company Name Street City, State Country

Date of Manufacture: MM/YYYY

Importer/U.S. Records Location: Importer Name Street City, State ZIP

Model: <Model ID>

Prototype ID: <Prototype ID>

This mattress meets the requirements of 16 CFR §1633 (federal flammability (open flame) standard for mattress sets) when used without a foundation.

THIS MATTRESS
IS INTENDED TO BE USED
WITHOUT A FOUNDATION



Imported Mattress

Labels for Domestic and Imported Mattresses Alone and with Foundation

Stitch Line

Manufactured by: Company Name Street City, State

Date of Manufacture: MM/YYYY

Model: <Model ID>

Prototype ID: <Prototype ID> <Prototype ID>

This mattress meets the requirements of 16 CFR §1633 (federal flammability (open flame) standard for mattress sets) when used without a foundation or with foundations <ID>

THIS MATTRESS
IS INTENDED TO BE USED

WITHOUT A FOUNDATION OR

WITH FOUNDATION(S):

<FOUNDATION ID>

Stitch Line

Manufactured by: Foreign Company Name Street City, State Country

Date of Manufacture: MM/YYYY

Importer/U.S. Records Location: Importer Name Street City, State ZIP

Model: <Model ID>

Prototype ID: <Prototype ID> <Prototype ID>

This mattress meets the requirements of 16 CFR §1633 (federal flammability (open flame) standard for mattress sets) when used without a foundation or with foundations <ID>

THIS MATTRESS
IS INTENDED TO BE USED

WITHOUT A FOUNDATION OR

WITH FOUNDATION(S):

< FOUNDATION ID>



Domestic Mattress

Imported Mattress

Question & Answer Session



Closing Remarks

