



**BUREAU
VERITAS**

**DILLARD'S HOME MERCHANDISING DIVISION, INC. TEST PROTOCOL FOR
DILR-01990-USA- (V15)
LAW LABEL (BEDDING TAG)**

BV Lab Number:
Technician
Name:
Test Date:
Reviewed
By/Date: **Page 1 of 9**

Evaluation	Citation / Method	No. of Samples	Criteria	Remark	Rating	Results
SCOPE: Since some individual states regulate the use of "adjunctive terms", it is recommended for the vendor to consult the individual state when licensing the product for acceptance of the terminology.						
SUPPLEMENTARY PROTOCOL						
A R	Flammability for Upholstered Furniture CPSD-HL-PTCL-03001-USA		Shall meet the applicable requirement as specified.			
LABELING						
R	Law label material composition CPSD-GB-01057-MTHD		IABFLO required label must be Tyvek, Valeron Vellum cloth, or a material of comparable quality that will not flake when abraded. Only fail the law label when it is made of paper and/or poor label quality that can tear easily by hand.	BEDDING TAG / FURNITURE TAG		
R	Law label size CPSD-GB-01056-MTHD		Minimum size 2 x 3 inches as required by law Width: Measure the overall width. Length: Measure starting at the top of the word "UNDER" to bottom of "Country of origin" (the bottom of the country listed) Pass / Fail based on 1/8" tolerance	BEDDING TAG / FURNITURE TAG		
R	Uniform law label printing CPSD-GB-01057-MTHD		English language ONLY allowed (bilingual language not accepted in single label, other language would need to be separate label). Black font on white background, no printing on back.	BEDDING TAG / FURNITURE TAG		
R	Law label review: new format CPSD-GB-01057-MTHD		Should not contain any blank stamp block on law label Exception: If registered in PA, then block stamp is acceptable.	BEDDING TAG / FURNITURE TAG		
R	Law label review: point of sale placement CPSD-GB-01057-MTHD		[Label location] Upholstered furniture/bedding labels must be visible at point of sale through packaging box windows or the label must be an exact duplicate on package and identical to that on product (in terms of font size and every detail) on package/colorbox, or retail box with a white label and black lettering. There should be no other label or sticker stacked on top or covering the label. A shipping box would not be considered retail packaging.	BEDDING TAG / FURNITURE TAG		



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Evaluation	Citation / Method	No. of Samples	Criteria	Remark	Rating	Results
			Pass or fail based on complete visibility of label.			
R Law label review: law statement and font size	CPSD-GB-01057- MTHD		Verify presence and check the spelling on label, shall appear at the top of label: UNDER PENALTY OF LAW THIS TAG NOT TO BE REMOVED EXCEPT BY THE CONSUMER The minimum font size is: - 1/8" in height - Must be in capital letters - Must be Bold Print. - With separate solid line for sectional disclosure of information. Note: Separating line should extend to the edges of the label.	BEDDING TAG / FURNITURE TAG		
R Law label review: material statement font size and type	CPSD-GB-01056- MTHD		The word "ALL NEW MATERIAL" and the description of the filling materials and "CONTENTS STERILIZED" in this section. The minimum font size is 1/8 in. in height and - Must be in capital letters. - Must be Bold Print. The phrase "consisting of" can be lower case but needs to be Bold print. The phrase "consisting of" does not need to meet the 1/8 inch height. Do not Fail if all letters are capital letters since this is also allowed. This section of label is to be followed with a solid line to separate the disclosure of information presented on the label. Note: Separating line should extend to the edges of the label.	BEDDING TAG / FURNITURE TAG		
R Law label review: material statement	Visual		ALL NEW MATERIAL consisting of (Description of filling material by its true generic name. If more than one filling material is used, the percentage by weight in order of predominance , the largest component listed first.) Must use whole numbers and no decimal points when reporting the percentages. If filling material is in the form of a pad, the term pad is required as disclosure of the content (as applicable).	BEDDING TAG / FURNITURE TAG		



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	Evaluation	Citation / Method	No. of Samples	Criteria	Remark	Rating	Results
				<p>Note: The terms "batting" and "pad" will require a variance from the state of Pennsylvania since Pennsylvania does not accept these terms. A copy of the variance should be submitted-Rate as Data, Do Not Fail.</p> <p>If the material is in loose fiber form, should include "Fiber" example: Cotton Fiber or Polyester Fiber.</p> <p>Cannot use the term "OTHER FIBERS". IABFLO terminology that is acceptable is "TEXTILE FIBERS OF UNKNOWN KIND".</p> <p>Cannot use the term "Recycled". It is a prohibited term. If term is present in this section, rate as a Fail.</p> <p>Cannot use the term "Fiberfill".</p> <p>For adjunct terms follow the IABFLO terminology.</p> <p>Must have separate descriptions when cushions are loose.</p> <p>If part of a set, it can be sectional disclosed on one label.</p> <p>If pillow/cushion could also be used as a replacement, the label needs to be separate.</p> <p>Applicable to Down and Feather Only:</p> <p>For Feather & Down filling material. The statement "CONTENTS STERILIZED" must be added to the label in this section, followed by filling material(s) name.</p>			
R	Law label review: reg. and permit number with documentation	CPSD-GB-01057-MTHD		<p>Verify presence of the REG. NO.</p> <p>Vendor must include copy of registration notice from the originating state (per client protocol). Proof of permit, original or copy of current registration is acceptable. (Manufacturer's Uniform Registration Number, URN, information.) is acceptable.</p> <p>Permit Number Applicable to Down and Feather Only.</p> <p>REG. NO. PER. NO.</p>	BEDDING TAG / FURNITURE TAG		



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Evaluation	Citation / Method	No. of Samples	Criteria	Remark	Rating	Results
			<p>The minimum font size is 1/8" in height. Must be all capital letters and bold print. # Sign is not acceptable. Registration number must always have a prefix and suffix. A suffix is not required if URN is obtained in the state of manufacturer. Prefix is the two letter abbreviation of the state that issued the number. Suffix is the two letter abbreviation of the state or country where the manufacturing plant is located. Do not Fail if documentation is not supplied. Add comment in report that documentation was not supplied. - With separate solid line for sectional disclosure of information. Note: Separating line should extend to the edges of the label.</p>			
Law label review: reg. and permit number with documentation	CPSD-GB-01057-MTHD		<p>[Permit number applicable to down and feather only]</p> <p>REG. NO..... PER. NO</p> <p>The minimum font size is 1/8" in height. Must be all capital letters and bold print. # Sign is not acceptable. Registration number must always have a prefix and suffix. A suffix is not required if URN is obtained in the state of manufacturer. Prefix is the two letter abbreviation of the state that issued the number. Suffix is the two letter abbreviation of the state or country where the manufacturing plant is located. - With separate solid line for sectional disclosure of information. Note: Separating line should extend to the edges of the label.</p>	BEDDING TAG / FURNITURE TAG		
R Law label review: certification statement	Visual		<p>Verify presence of the following sentence on label. "Certification is made by the manufacturer that the materials in this article are described in accordance with law." With separate line for sectional disclosure of information. Note: Separating line should extend to the edges of the label. Note: If the label does not include the word "the" between the "that" and "materials" or a "." at the end, or a "the between "with" and "law", do not fail a running change should be made. The minimum font size is 1/8" in height for the capital letters.</p>	BEDDING TAG / FURNITURE TAG		
R Law label review: licensed registrar details	CPSD-GB-01057-MTHD		<p>May begin with "MADE BY" or "MADE FOR" This wording is accepted by all states. Cannot list both MADE BY" and "MADE FOR"</p>	BEDDING TAG / FURNITURE TAG		



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Evaluation	Citation / Method	No. of Samples	Criteria	Remark	Rating	Results
			<p>Other variations such as "MANUFACTURED BY", "IMPORTED BY", "DISTRIBUTED BY", or "MANUFACTURED FOR" or equivalent may also be used. Fail if the term "SOLD BY" is used. The preceding phrases should be in capital letters and bold print. The minimum font size for all capital letters is 1/8" in height</p> <p>Name and complete Address including street, city, state and zip. The minimum font size for the capital letters is 1/8" in height. The name and address is not required to be in bold print or all capital letters. Do not Fail if all letters are capital letters since this is also allowed. This section of label is to be followed with a solid line to separate the disclosure of information presented on the label. Note: Separating line should extend to the edges of the label.</p>			
R	Law label review: date of delivery	CPSD-GB-01057-MTHD	<p>"Date of Delivery" words are required along with a line. Report actual statement. Pass or Fail for presence of wording. The minimum the font size for the capital letters is 1/8" in height. Date of Delivery is not required to be in bold print or all capital letters. Do not Fail if all letters are capital letters since this is also allowed. The actual date is not required. Do not Pass or Fail if date is not listed.</p>	BEDDING TAG / FURNITURE TAG		
R	Law label review: finished product size	CPSD-GB-01057-MTHD	<p>[Bedding products such as sleeping bags, mattresses, comforters, mattress pads, pads, box springs, pillows and similar articles] [Not for decorative pillows] Report actual. Pass or fail is required Length expressed in inches Width expressed in inches Metric alone is not allowed The term in. inch or inches is acceptable The symbol (") is not acceptable</p>	BEDDING TAG / FURNITURE TAG		
R	Law label review: net weight of filling material	Visual	<p>[Sleeping bags, mattresses, box springs, pads (sewn in pads for mattresses) and similar items] [Not for bed pillows, decorative pillows, comforters, or mattress pads] Report actual. Pass or fail is required Weight expressed in pounds and ounces</p> <p>Note: If weight is less than 1lb, only the ounces need to be listed.</p>	BEDDING TAG / FURNITURE TAG		



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Evaluation	Citation / Method	No. of Samples	Criteria	Remark	Rating	Results
			If weight is over 1lb, both pounds and ounces need to be listed. If the weight only lists the lbs as a whole number, no need to list the ounces.			
R Law label review: federal RN #	CPSD-GB-01057- MTHD		Report actual Do not Pass or Fail. If required for product type for FTC. Different than the URN / REG NO for the states type	BEDDING TAG / FURNITURE TAG		
R Law label review: country of origin	Visual		"MADE IN" or similar (must be present) Report actual. MADE IN (COUNTRY OF ORIGIN) Should be all capital letters and bold print. The minimum font size is 1/8" in height. May be listed on two lines with the actual country on the second line. This should be last line in the "Other Information" section	BEDDING TAG / FURNITURE TAG		
R Law label review: fiber content	CPSD-GB-01057- MTHD		[Shell / lining / filling] Report actual Do not Pass or Fail.	BEDDING TAG / FURNITURE TAG		
R Law label review: care instruction	CPSD-GB-01057- MTHD		This is not permitted on law label. Pass or Fail is required.	BEDDING TAG / FURNITURE TAG		
R Law Label Review: Others	CPSD-GB-01057- MTHD		Report actual. Pass or fail is required No advertising or company logo (including company websites and patent numbers) is permitted on the law label. There should be no QR (Quick Response) code. No text or print on back of label. No dual language.	BEDDING TAG / FURNITURE TAG		
R Law label review: bar code	CPSD-GB-01057- MTHD		[Optional] Report actual Do not Pass or Fail Verify Presence Some states allow placement of a bar code at the bottom of the label separated by a bold black line from the rest of the label information	BEDDING TAG / FURNITURE TAG		



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	Evaluation	Citation / Method	No. of Samples	Criteria	Remark	Rating	Results
R	Law label review: Date Code / Date of Manufacture	CPSD-GB-01057-MTHD		Some states allow placement of a date code/date of manufacture at the bottom of the label separated by a bold black line from the rest of the label information.	BEDDING TAG / FURNITURE TAG		
R	Law label review: material statement	CPSD-GB-01057-MTHD		ALL NEW MATERIAL (Percentages of the filling materials are not required on toy labels.) Must be listed in order of predominance. Filling materials also include plastic pellets, polystyrene foam beads, sand, gravel, rice, beans or other similar fillers are recommended to be inner-bagged and listed. Also if the toy contains any stiffeners such as wire, plastic, wood, cardboard, they also need to be listed. Note: Excluded items from being listed on the tag include: rattles, squeakers, music boxes, voice chips, battery operated mechanical or electronic devices inside.	LABELING - TOY Tag (PA, OH, & MA)		
	Optional information - law label - toy tag	CPSD-GB-01057-MTHD		[State Laws (PA, OH & MA)] May be listed on face or back side of label. May include other optional information such as the following: Company name and address Age limits Washing instructions etc. Tracking label Report actual	LABELING - TOY Tag (PA, OH, & MA)		
R	Registration Number with Documentation	CPSD-GB-01057-MTHD		REG. NO. Must include PA registration number at a minimum. May also include MA registration number. Vendor is requested to include a copy of registration notice from the originating state (per client protocol). Anything official with state letterhead and accurate product description is acceptable. Do not Fail if documentation is not supplied.	LABELING - TOY Tag (PA, OH, & MA)		
R	Labeling review: country of origin	16 CFR 300/303, 19 CFR 134.11	1	"Made in" or similar (must be present) Report actual.	LABELING - TOY Tag (PA, OH, & MA)		
	Toys Sold in Sets - law label - toy tag	CPSD-GB-01057-MTHD		[State Laws (PA, OH & MA)] Components labeled separately	LABELING - TOY Tag (PA, OH, & MA)		



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LAW LABEL (BEDDING TAG)

Evaluation	Citation / Method	No. of Samples	Criteria	Remark	Rating	Results
			Or Main Component with sectional disclosure of all components.			
R Law label material composition	CPSD-GB-01057-MTHD		IABFLO required label must be Tyvek, Valeron Vellum cloth, or a material of comparable quality that will not flake when abraded. Note: Form, design, color or size of label is left up to mfr/importer provided that the information is clearly legible. Printing is allowed on both sides.	LABELING - TOY Tag (PA, OH, & MA)		
R Law label review: Label Location - Upholstered Furniture	Visual		Report data for mock up sample and make a note. If there are actual sample received should be given the pass or fail Securely attached by stitching. Adhesive law labels on folding metal chairs are permitted. Adhesive law labels with all 4 corners stapled are permitted on items such as barstools and desk chairs where there are no seams for sewing.	LABEL LOCATION		
R Law label review: Label Location - Pillow and Cushion	CPSD-GB-01057-MTHD		Report DATA for mock up sample and make a note. If there are ACTUAL SAMPLE received should be given the PASS or FAIL Label must be attached by stitching	LABEL LOCATION		
R Law label review: Label Location - Other product	CPSD-GB-01057-MTHD		[LABEL LOCATION (Report DATA for mock up sample and make a note. If there are ACTUAL SAMPLE received should be given the PASS or FAIL)] Attached by stitching There should be no other label or sticker stacked on top or covering the label.	LABEL LOCATION		

Refer to DILR-GB-\$LST-GB-PRICE LIST for price

No. Of Samples Required for Complete Testing		
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Client Approval:	Lucy Feng
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DILLARD'S HOME MERCHANDISING DIVISION, INC. TEST PROTOCOL FOR
DILR-01990-USA- (V15)
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No. Of (Fully Packed) Cartons For Transit Testing:		
No. Of Working Days For Complete Testing:	1	

	25/Aug/2022
Creation Date:	27/Sep/2005
Last Revision Date:	23/Aug/2022
Pricing Review Date	
Technical Review Date:	

Key

A	Additional Charge For This Test
M	Mandatory
R	Regulatory

Result Key

C	Claimed
R	Recorded
M	Meets
NM	Does Not Meet
NA	Not Applicable
NT	Not Tested

Rating Key

PASS	Pass
FAIL	Fail
NR	Not Requested