



CONSUMER PRODUCTS SERVICES DIVISION

## PILLOWFLEX, INC

**Technical Report:** (5116)239-0255  
Date Received: August 26, 2016

September 06, 2016  
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PETE EDMONDSON

PILLOWFLEX, INC  
511 TOMMY LEE COOK RD  
PALMETTO, GA 30268  
UNITED STATES

Sample Description:	9X4.5 INCH URETHANE FOAM PORTABLE BED RAIL		
Vendor:	PILLOWFLEX, INC	Sample Size:	2
Manufacturer:	PILLOWFLEX, INC	Style No(s):	N/A
Buyer:	N/A	SKN/SKU No.:	9X4.5 SEMI CIRCLE
Labeled Age Grade:	NOT PRESENT	PO No.:	08241601
Appropriate Age Grade:	CHILDREN PRODUCTS, FROM 2 TO 5 YEARS OF AGE	Ref #:	N/A
Client Specified Age Grade:	NOT REQUESTED	Country of Origin:	UNITED STATES
Tested Age Grade:	CHILDREN PRODUCTS, FROM 2 TO 5 YEARS OF AGE	Assortment No.:	N/A
UPC Code:	0091037318886		

### EXECUTIVE SUMMARY:

The sample(s) MEETS the following requirement(s):

- The requirements of 16 CFR 1224, "Safety Standard for Portable Bed Rails".
- The requirements of ASTM F2085-12, "Standard Consumer Safety Specification for Portable Bed Rails".

BVCPSP Buffalo Contact Information for this Report:

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/gf

cc: KIM GAY, PILLOWFLEX, INC

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**RESULTS:**

**SAFETY STANDARD FOR PORTABLE BED RAILS (16 CFR 1224)**

**ASTM F2388-12, "STANDARD CONSUMER SAFETY SPECIFICATION FOR PORTABLE BED RAILS"**

Section	Requirement	Result
<b>5.</b>	<b>General Requirements</b>	
5.1	No sharp points or edges present as defined by 16 CFR 1508.48 and 16 CFR 1508.49.	M
5.2	No small parts present as defined by 16 CFR 1501.	M
5.3	Any exposed wood parts shall be smooth and free from splinters.	NA
5.4	Shall conform to 16 CFR 1303.	NA
5.5	Non-rigid bed rails need only meet the general requirements of section 5, the performance requirement of 6.3, and the warning requirements of 9.3.	M
5.6	Warning labels shall be permanent when tested per sections 10.1-10.3. Warning statements applied directly onto the surface of the product by hot stamping, heat transfer, printing, wood burning, etc. shall be permanent when tested per 10.4. Nonpaper labels shall not liberate small parts when tested in accordance with 10.5	M
5.7	Installation components that are required to meet the performance requirements of 6.4, 6.5, and 6.6 shall be fully assembled, inseparable, and permanently attached to a component requiring consumer assembly (this excludes any consumer adjustment).	NA
5.8	For products requiring consumer assembly, supplied hardware used for assembly of the bedrail such as screws, nuts or bolts shall be captive hardware to their respective components.	NA
<b>6.</b>	<b>Performance Requirements</b>	
6.1	Structural Integrity – All tests of 8.1 shall be performed sequentially. After testing in accordance with 8.1, there shall be no hazardous condition created.	NA
6.2	Openings – Holes and slots that extend entirely through a wall section of any rigid material less than 0.375 in. thick and admit a 0.210 in. diameter rod shall also admit a 0.375 in. diameter rod. Holes and slots that are between 0.210 in. and 0.375 in. and have a wall thickness less than 0.375 in. but are limited in depth to 0.375 in. maximum by another rigid surface shall be permitted.	NA
6.3	Enclosed Openings – When tested in accordance with 8.2, no enclosed opening in the bed rail shall permit passage of the Torso probe.	NA
6.4	Openings Created by Bed Rail Displacement of Adjacent Style Portable Bed Rail - When tested in accordance with 8.3, no opening shall be created between the mattress and the bed rail that will allow the passage of the Torso probe.	NA



**SAFETY STANDARD FOR PORTABLE BED RAILS (16 CFR 1224)**




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Section	Requirement	Result
6.5	Openings Created by Displacement Mattress-Top Portable Bed Rails – When tested in accordance with 8.4, the Wedge Probe shall not penetrate to a depth greater than 4.5 in. The bed rail shall not displace horizontally such that the inner edge of the rail moves off the top mattress surface.	NA
6.6	Openings Created by Displacement of Portable Bed Rails Intended for use on Specific Manufacturers' Beds – When tested in accordance with 8.5 there shall be no opening between the mattress and bed rail that will permit passage of torso probe.	NA
6.7	Protrusions – When tested in accordance with 8.6, neither string on the weight gage shall stay attached to any protrusion.	NA
6.8	Openings Between Bedposts and Ends of Portable Bed Rail – There shall be a minimum length of 9 in. between the ends of the bed rail and the corresponding ends of the test mattresses on test platforms 1 & 2.	NA
6.8.1	Adjacent Style and Mattress Top Portable Bed Rails– There shall be a minimum length of 9 in. between the left and right ends of the portable bed rail and the corresponding left and right ends of the test mattress on test platforms 1 & 2.	NA
6.8.2	Bed Manufacturer Specific Type Portable Bed Rails- There shall be a minimum of 9in. between the left and right ends of the portable bed rail and the corresponding left and right ends of the test mattress on platforms 1 & 2.	NA
6.9	Bedrail components requiring consumer assembly shall not be able to be misassembled when evaluated to 6.9.1.	NA
<b>9.</b>	<b>Marking and Labeling</b>	
9.1	Product and the retail package shall both be marked to indicate the following:	
9.1.1	Name and place of business (city, state and mailing address, including zip code) or telephone number of the manufacturer, importer, distributor, or seller.	NA
9.1.2	Code Mark or other means that identifies the date (month and year minimum) manufactured.	NA
9.2	Any upholstery label required by law shall not be used to meet the requirements of 9.1.	NA
9.3	Each product and the retail packaging shall have warning statements. The warning statements shall be in contrasting colors, permanent, conspicuous, and sans serif style font. In warning statements, the safety alert symbol "⚠" and the word "WARNING" shall not be less than 0.20 in. (5 mm) high. The remainder of the text shall be characters whose upper case shall be at least 0.10 in. (2.5 mm) high.	M



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**ASTM F2388-12, "STANDARD CONSUMER SAFETY SPECIFICATION FOR PORTABLE BED RAILS"**

Section	Requirement	Result
9.3.1	<p>The warning statements shall include the following, exactly as stated below:</p> <p> WARNING</p> <p>SUFFOCATION AND STRANGULATION HAZARD</p> <p>Gaps in and around bed rails have entrapped young children and killed infants.</p> <p>-NEVER use with children younger than 2 years old. Use ONLY with older children who can get in and out of adult bed without help. NEVER use in place of crib.</p> <p>-NEVER use unless bed rail is tight against mattress, without gaps, and at least 9 in. from headboard and footboard. Do not fill gaps with pillows, blankets, or other items that can suffocate children.</p> <p>-NEVER use on toddler bed, bunk bed, water bed, or bed with inflatable mattress. Use ONLY on adult bed.</p>	M
9.3.2	<p>-For manufacturers' specific bed rails:</p> <p>(1) Use only on (manufacturer insert applicable bed and mattress/platform information).</p>	NA
9.4	<p>At least one installation component must be labeled with the entrapment hazard warning in 9.4.1. The entrapment hazard warning shall be in contrasting colors, permanent, conspicuous, and sans serif style font.</p> <p>In the entrapment hazard warning statement the safety alert symbol "" and the words "WARNING - ENTRAPMENT HAZARD" shall not be less than 0.20 in. (5 mm) high. The remainder of the text shall be characters whose upper case shall be at least 0.10 in. (2.5 mm) high.</p>	NA
9.4.1	<p>The following warning shall be addressed:</p> <p> WARNING – ENTRAPMENT HAZARD</p> <p>NEVER use bedrail without properly securing bed rail to bed.</p> <p>Incorrect installation can allow bedrail to move away from mattress, which can lead to entrapment and death.</p>	NA
<b>10.</b>	<b>Permanency of Labels and Warnings</b>	
10.1	A paper label shall be considered permanent if it cannot be removed with tearing the label or damaging the surface to which it is attached.	M
10.2	A non-paper label shall be considered permanent if it cannot be removed or attempting such action damages the surface to which it is attached.	NA
10.3	A warning label attached by a seam shall not detach when subjected to a 15 lbf. tension test. (Use 3/4 in. diameter clamp surface.)	NA



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Section	Requirement	Result
10.4	Adhesion testing – For warnings applied directly to surface of product:	
10.4.1	After applying Test Method B, Cross-Cut Tape Test of Test Methods D 3359 (eliminating parallel cuts) once in each different location where warnings are present, the printing shall remain attached and legible.	NA
10.5	If a non-paper label can be removed with the aid of tools or solvents, no part of the label shall be able to fit entirely within the small parts cylinder.	NA
<b>11.</b>	<b>Instructional Literature</b>	
11.1	Assembly, maintenance, cleaning, operating, and adjustments and warning instructions shall be included and easy to read and understand.	NA
11.1.1	The instructions shall contain the warning statements, required by 9.3.1, and, where applicable, shall address the statements in 9.3.2. In addition, instructions shall address the following:	NA
11.1.1.1	Discontinue use if damaged, broken, or if parts are missing.	NA
11.2	Warnings must include safety alert symbol and must adhere to the text height requirements as specified in 9.3.	NA

*M = Meet NM = Not Meet N/A = Not Applicable R = Refer to Comment Section*

**EXHIBIT #1**



**SAMPLE PRODUCT**