CONSUMER PRODUCTS SERVICES DIVISION

SILVER TIMING LTD

Technical Report: **(8523)019-0007** January 30, 2023
Date Received: January 19, 2023 Page 1 of 13

TERRY / KALI
SILVER TIMING LTD
UNIT 801-802, 8/F, PIONEER PLACE
33 HOI YUAN ROAD
KWUN TONG
KOWLOON
HONG KONG

Sample Description:	PARTY HORN NEW YEAR 13.5IN ON* 1.) A 2.) B 3.) C 4.) D		
Vendor:	N/A	Sample Size:	8
Manufacturer:	N/A	Style No(s):	G24461N
Buyer:	OWN NAME	SKN/SKU No.:	G24461N
Labeled Age Grade:	NOT PRESENT	PO No.:	7070
Appropriate Age Grade:	N/A (ADULT)	Ref #:	N/A
Client Specified Age Grade:	TOY	Country of Origin:	CHINA
Tested Age Grade:	OVER 2 YEARS OF AGE	Assortment No.:	N/A
UPC Code:	721003244610	Country of Destination:	USA

EXECUTIVE SUMMARY:

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

- The small part requirement of 16 CFR 1501 (FHSA Regulations).
- The flammability requirement of solids under ASTM F963-17 section 4.2 according to Annex A5, "Flammability testing procedure for solids and soft toys".
- The labeling requirements of ASTM F963-17, “Standard consumer safety specification for toy safety”.
- The mechanical hazards requirements of ASTM F963-17, “Standard consumer safety specification for toy safety”.
- The tracking label requirement of the Consumer Product Safety Improvement Act (CPSIA) of 2008 section 103 Tracking Labels for Children's Products.

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EXECUTIVE SUMMARY:

The style# A sample(s) MEET the following requirement(s):

- The soluble heavy metals content in surface coating requirements of ASTM F963-17, "Standard Consumer Safety Specification for Toy Safety," Section 4.3.5.1(2).

- The soluble heavy metals content in substrate requirements of ASTM F963-17, "Standard Consumer Safety Specification for Toy Safety," Section 4.3.5.2(2)(b).

- The initial total heavy metals content analysis for soluble heavy metals content in surface coating requirements of ASTM F963-17, "Standard Consumer Safety Specification for Toy Safety," Section 4.3.5.1(2).

- The initial total heavy metals content analysis for soluble heavy metals content in substrate requirements of ASTM F963-17, "Standard Consumer Safety Specification for Toy Safety," Section 4.3.5.2(2)(b).

- The phthalates (BBP, DBP, DEHP, DINP, DIBP, DPENP, DHEXP & DCHP) content requirements of the Consumer Product Safety Improvement Act (CPSIA) of 2008 Sec. 108(a) and 108(c), 16 CFR 1307).

- The total lead content of 100ppm requirements by composite testing in substrate materials (Consumer Products Safety Improvement Act (CPSIA) of 2008).

- The total lead content of 90ppm requirements of 16 CFR 1303, "Ban of lead-containing paint and certain consumer products bearing lead-containing paint" as mandated by Congress in section 101(f) of the Consumer Products Safety Improvement Act (CPSIA) of 2008, Public Law 110-314.

- The heavy metals content in packaging requirements of Model Toxics Legislation of the Toxics in Packaging Clearinghouse, TPCH (formerly the Coalition of Northeastern Governors, CONEG).

Note: According to the associated documents of Consumer Product Safety Improvement Act (CPSIA) of 2008, exemptions were granted to certain materials or products, such as natural materials / paper and similar materials / CMYK process printing inks / metal & alloys / electronics devices components / ordinary books / dyed & undyed textiles. Therefore, the lead content analysis of some components was not conducted.

BUREAU VERITAS SHENZHEN CO., LTD.

Victor Pang

Victor Pang
Assistant Manager
Toys And Juvenile Products Department

VP / jf

RESULTS:

APPROPRIATE AGE GRADE DETERMINATION

The Appropriate Age Grade is determined with reference to the Age Determination Guidelines of the Consumer Product Safety Commission (CPSC); and the ASTM F963-17, "Standard Consumer Safety Specification for Toy Safety". Annex A1
Note : The most stringent age grade from the Labeled Age Grade and the Appropriate Age Grade will be used for testing.
Note : If the client does not specify an age grade for testing or request Bureau Veritas Consumer Products Services, Inc. to determine an appropriate age grade, the labeled age grade will be used for testing.

USE AND ABUSE TESTS

The samples were undergo the tests in accordance with section 8.6 through 8.16, whichever is applicable		
Test	**Test Parameters**	**Standard Reference**
Impact Test	4 x 3 ft	1500.52(b)
Torque Test	4 in-lbs	1500.53(e)
Tension Test	15 lbs	1500.53(f)

RESULTS:

PHYSICAL AND MECHANICAL HAZARDS (ASTM F963-17)

Section	Requirement	Result
4.1	Material Quality	M
4.3.7	Stuffing Materials	N/A
4.5	Sound-Producing Toys	N/A
4.6	Small Objects	M
4.7	Accessible Edges	M
4.8	Projections	N/A
4.9	Accessible Points	M
4.10	Wires and Rods	N/A
4.11	Nails and Fasteners	N/A
4.12	Plastic Film	N/A
4.13	Folding Mechanisms and Hinges	N/A
4.14	Cords, Straps and Elastics	N/A
4.15	Stability and Over-Load Requirements	N/A
4.16	Confined Spaces	N/A
4.17	Wheels, Tires, and Axles	N/A
4.18	Holes, Clearances and Accessibility of Mechanisms	N/A
4.19	Simulated Protective Devices	N/A
4.20	Pacifiers	N/A
4.21	Projectile Toys	N/A
4.22	Teethers and Teething Toys	N/A
4.23	Rattles	N/A
4.24	Squeeze Toys	N/A
4.25	Battery-Operated Toys (exclude Section 4.25.10 Battery-powered ride-on toys & Section 4.25.11 Toys that Contain Secondary Cells or Secondary Batteries)	N/A
4.26	Toys Intended to be Attached to a Crib or Playpen	N/A
4.27	Stuffed and Beanbag-Type Toys	N/A
4.30	Toy Gun Marking	N/A
4.32	Certain Toys with Nearly Spherical Ends	N/A
4.34	Small Balls	N/A
4.35	Pompoms	N/A
4.36	Hemispheric-Shaped Objects	N/A
4.37	Yo Yo Elastic Tether Toys	N/A
4.38	Magnets	N/A
4.39	Jaw Entrapment in Handles and Steering Wheels	N/A
4.40	Expanding Materials	N/A

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

RESULTS:

LABELING AND INSTRUCTIONAL REQUIREMENT (ASTM F963-17)

Section	Requirement	Result
5.4 & 5.3	Aquatic Toys	N/A
5.5 & 5.3	Crib and Playpen Toys	N/A
5.6 & 5.3	Mobiles	N/A
5.7 & 5.3	Stroller and Carriage Toys	N/A
5.8 & 5.3	Toys Intended to be Assembled by an Adult	N/A
5.9 & 5.3	Simulated Protective Devices	N/A
5.10 & 5.3	Toys with Functional Sharp Edges or Sharp Points	N/A
5.11	Small Objects, Small Balls, Marbles and Balloons (16 CFR 1500.19)	N/A
5.12	Toy Caps (16CFR1500.86)	N/A
5.13	Art Materials (16 CFR 1500.14(b)(8))	N/A
5.15	Battery-Operated Toys (exclude 5.15.1 and 5.15.2)	N/A
5.15.1 & 5.3	Battery-Powered Ride-On Toys	N/A
5.15.2 & 5.3	Button or Coin Cell Batteries	N/A
5.16	Promotional Materials	M
5.17 & 5.3	Magnets	N/A
6.1	Definition and Description	M
6.2	Crib and Playpen Toys	N/A
6.3	Mobiles	N/A
6.4 & 5.3	Toys Intended to be Assembled by an Adult	N/A
6.5	Battery-Operated Toys	N/A
6.6	Battery-Powered Ride-On Toys	N/A
6.7	Toys in Contact with Food	N/A
7.1	Producer's Name and Address	M
7.2	Battery-Powered Ride-on Toys	N/A

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

FLAMMABILITY (ASTM F963-17 section 4.2 according to Annex A5)

Requirement	Test Method Reference	Findings
Burn rate no greater than 0.1 of an inch per second	ASTM F963-17 section 4.2 according to Annex A5	Ignited but Self-Extinguished.

RESULTS:

TOTAL LEAD CONTENT IN SURFACE COATING BY COMPOSITE TESTING ("Ban of Lead-containing paint and certain consumer products bearing Lead-containing paint", Consumer Product Safety Improvement Act (CPSIA) of 2008)

Test Method: U.S. CPSC-CH-E1003.09.1:2011

Element:				Lead		
Requirement: Maximum allowable limit:				90 mg/kg		
Sample Description				Result (mg/kg)		Conclusion
Color / Component		Location	Style	Overall	Potential	
(A)	All coating	Horn	A	LT 10	-	Pass
(B)	Shiny silver coating	Tassel	A	LT 10	-	Pass
	Shiny magenta coating	Tassel	A			
	Bright silver coating	Beads of necklace	A			

LT = Less Than
** = Average of duplicate analyses*

mg/kg = milligrams per kilogram (ppm = parts per million)
Potential = Estimated lead content per component is based on calculation by component individual weight

TOTAL LEAD CONTENT IN SUBSTRATE BY COMPOSITE TESTING (100PPM) (Consumer Product Safety Improvement Act (CPSIA) of 2008)

Test Method: U.S. CPSC-CH-E1001-08.3:2012 or U.S. CPSC-CH-E1002-08.3:2012

Analyte	Lead	
Requirement: Maximum allowable limit:	100 mg/kg	

Analyte				Lead (Pb)	Conclusion
Sample Description				Result	
Color / Component		Location	Style	(mg/kg)	
(A)	Clear plastic	Tassel	A	LT 10	Pass
	Silver plastic/paper	Horn	A		
(B)	White plastic	Whistle	A	10	Pass
	Beige plastic	Beads of necklace	A		
(C)	Silvery metal	Staple on tassel	A	LT 10	Pass

LT = Less Than
** = Average of duplicate analyses*

mg/kg = milligrams per kilogram (ppm = parts per million)

RESULTS:

TOTAL HEAVY METALS CONTENT - INITIAL ANALYSIS FOR SOLUBLE HEAVY METALS CONTENT IN SURFACE COATING (ASTM F963-17, Section 4.3.5.1(2))

Test Method: ASTM International Standard ASTM F963-17, Section 8.3.1 and Annex A7.

Sample Identity	Color	Location	Style
A	All coating	Horn	A
B	Shiny silver coating	Tassel	A
	Shiny magenta coating	Tassel	A
	Bright silver coating	Beads of necklace	A

Analyte	As	Ba	Cd	Cr	Hg	Pb	Sb	Se	
Max. Limit (mg/kg)	25	1000	75	60	60	90	60	500	

Analyte	As	Ba	Cd	Cr	Hg	Pb	Sb	Se	Conclusion
Sample	Result (mg/kg)								
A	LT 7	17	LT 10	LT 7	LT 5	LT 10	34	LT 10	Pass
B	LT 7	100	LT 10	LT 7	LT 5	LT 10	260	LT 10	Data

mg/kg = milligrams per kilogram (ppm=parts per million)
LT = Less Than

As = Arsenic, Ba = Barium, Cd = Cadmium, Cr = Chromium, Hg = Mercury, Pb = Lead, Sb = Antimony, Se = Selenium

Remark:
On an initial analysis for soluble heavy metals content, any component of greater than 80% of the set limit, the result is inconclusive for the requirement and therefore were retested with soluble heavy metals analysis of ASTM F963-17, Sections 8.3.2 to 8.3.4 as specified in Section 8.3.1.3. The result herein is for reference only (show Data), please refer to soluble heavy metals content analysis for the corresponding conclusive results.

RESULTS:

TOTAL HEAVY METALS CONTENT – INITIAL ANALYSIS FOR SOLUBLE HEAVY METALS CONTENT IN SUBSTRATE (ASTM F963-17, Section 4.3.5.2(2)(b))

Test Method: ASTM International Standard ASTM F963-17, Section 8.3.1 and Annex A7.

Sample Identity	Color	Location	Style
Type I: Substrate other than modeling clay			
A.	Clear plastic Silver plastic/paper	Tassel Horn	A A
B.	White plastic Beige plastic	Whistle Beads of necklace	A A

Analyte	As	Ba	Cd	Cr	Hg	Pb	Sb	Se
Max. Limit Type I (mg/kg)	25	1000	75	60	60	90	60	500
Max. Limit Type II (mg/kg)	25	250	50	25	25	90	60	500

Analyte	As	Ba	Cd	Cr	Hg	Pb	Sb	Se	Conclusion
Sample	Result (mg/kg)								
A	LT 7	15	LT 10	LT 7	LT 5	LT 10	23	LT 10	Pass
B	LT 7	500	LT 10	LT 7	LT 5	10	180	LT 10	Data

mg/kg = milligrams per kilogram (ppm=parts per million)
LT = Less Than
ND = None Detected
Detection limit (mg/kg): As and Cr = 7, Hg = 5, other elements = 10

As = Arsenic, Ba = Barium, Cd = Cadmium,
Cr = Chromium, Hg = Mercury, Pb = Lead,
Sb = Antimony, Se = Selenium

Remark:
Textiles (natural or synthetic) are exempted for lead content requirement according to clarification of Toy Industry Association for ASTM F963-17. The lead content analysis result of corresponding material herein is for client's reference only.
On an initial analysis for soluble heavy metals content, any individually tested component of greater than the set limit or any composite tested components of greater than 80% of the set limit, the result is inconclusive for the requirement and therefore were retested with soluble heavy metals analysis of ASTM F963-17, Sections 8.3.5 (excluding 8.3.5.5(3)) as specified in Section 8.3.1.3. The result herein is for reference only (show data), please refer to soluble heavy metals content analysis for the corresponding conclusive results.

RESULTS:

SOLUBLE HEAVY METALS CONTENT IN SURFACE COATING (ASTM F963-17, Section 4.3.5.1(2))

Test Method: ASTM International Standard ASTM F963-17, Section 8.3.2 to 8.3.4

Sample Identity	Color	Location	Style
A.	Shiny silver coating	Tassel	A
B.	Shiny magenta coating	Tassel	A
C.	Bright silver coating	Beads of necklace	A

Analyte	As	Ba	Cd	Cr	Hg	Pb	Sb	Se
Maximum Limit (mg/kg)	25	1000	75	60	60	90	60	500
Analytical Correction	60%	30%	30%	30%	50%	30%	60%	60%

Analyte	As	Ba	Cd	Cr	Hg	Pb	Sb	Se	Mass of Trace Amount	Conclusion
Sample	Result (mg/kg)								(g)	
A.	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2	-	Pass
B.	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2	-	Pass
C.	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2	-	Pass

LT = Less Than
CR = adjusted analytical result
mg/kg = milligrams per kilogram (ppm=parts per million)
** = Average of duplicate analysis*

As = Arsenic, Ba = Barium, Cd = Cadmium,
Cr = Chromium, Hg = Mercury, Pb = Lead,
Sb = Antimony, Se = Selenium

RESULTS:

SOLUBLE HEAVY METALS CONTENT IN SUBSTRATE (ASTM F963-17, Section 4.3.5.2(2)(b))

Test Method: ASTM International Standard ASTM F963-17, Section 8.3.5 (Excluding 8.3.5.5(3))

Sample Identity	Color	Location	Style
Type I: Substrate other than modeling clay			
A	White thread	Necklace	A
B	White plastic	Whistle	A
C	Beige plastic	Beads of necklace	A

Analyte	As	Ba	Cd	Cr	Hg	Pb	Sb	Se
Max. Limit Type I (mg/kg)	25	1000	75	60	60	90	60	500
Max. Limit Type II (mg/kg)	25	250	50	25	25	90	60	500
Analytical Correction	60%	30%	30%	30%	50%	30%	60%	60%

Analyte	As	Ba	Cd	Cr	Hg	Pb	Sb	Se	Mass of Trace Amount	Conclusion
Sample	Result (mg/kg)								(g)	
A	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2	3	LT 2	-	Pass
B	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2	-	Pass
C	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2	LT 2	-	Pass

mg/kg = milligrams per kilogram (ppm=parts per million)
CR = adjusted analytical result
LT = Less Than
ND = None Detected

As = Arsenic, Ba = Barium, Cd = Cadmium,
Cr = Chromium, Hg = Mercury, Pb = Lead,
Sb = Antimony, Se = Selenium

Remark:
Textiles (natural or synthetic) are exempted for lead content requirement according to clarification of Toy Industry Association for ASTM F963-17. The lead content analysis result of corresponding material herein is for client's reference only.

RESULTS:

Heavy Metals Content In Packaging – Model Toxics Legislation Of The Toxics In Packaging Clearinghouse (TPCH)

Analyte	Sum of Pb, Cd, Hg & Cr VI	
Requirement: Maximum allowable limit:	100 mg/kg	

Analyte				Sum of Pb, Cd, Hg & Cr VI	
Sample Description				Result (mg/kg)	Conclusion
Color / Component		Location	Style		
(A)	All coating (> 4 colors)	Tag	A	LT 20	PASS
(B)	White / grey paper	Tad	A	LT 20	PASS
(C)	Bright silvery metal	Staple	A	LT 20	PASS

LT = Less Than
** = Average of duplicate analysis*
mg/kg = milligrams per kilogram (ppm=parts per million)
Pb = Lead, Cd = Cadmium, Hg = Mercury, Cr VI = Hexavalent chromium

Remark:
The former name of the working group of this legislation was Coalition of Northeastern Governors (CONEG).

RESULTS:

PHTHALATES CONTENT IN CHILDREN`S TOYS AND CHILD CARE ARTICLES (Consumer Product Safety Improvement Act (CPSIA) of 2008, Section 108(a) and 108(c), 16 CFR 1307)

Test Method: With reference to U. S. CPSC-CH-C1001-09.3 (April 1, 2010) / CPSC-CH-C1001-09.4 (January 17, 2018).

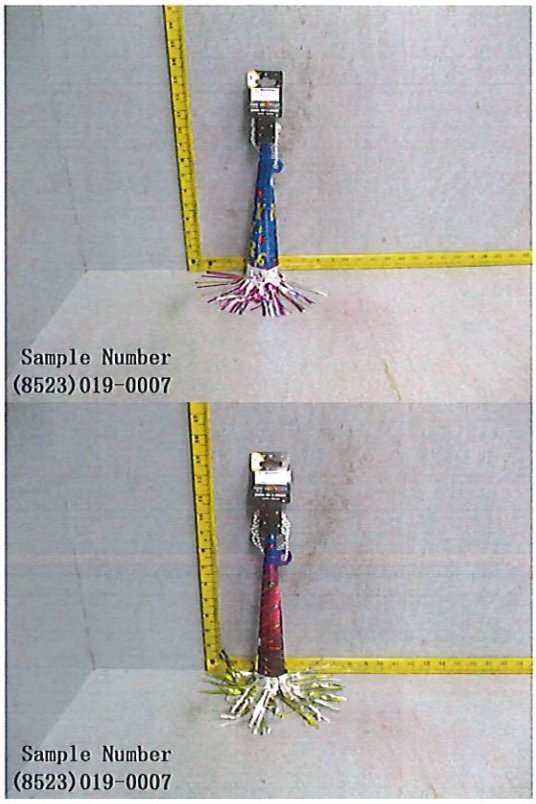
Sample Identity	Color / Component	Location	Style
A.	All coating	Horn	A
	Shiny silver coating	Tassel	A

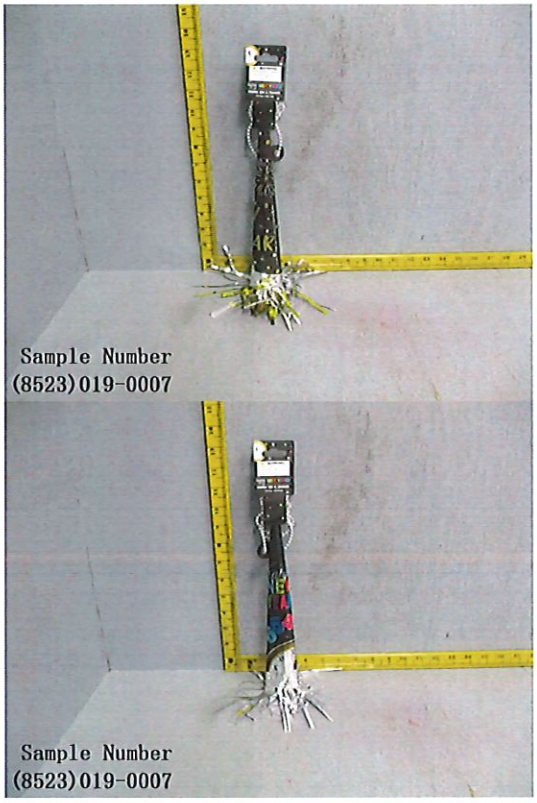
Test Parameter:	Listed Phthalates (See Remark)		
Requirement:	Each 0.1%		
Sample ID	Detected Analyte	Concentration (%)	Conclusion
A.	DEHP	0.015	Pass

Results reported in percentage
ND = None detected
Detection Limit: Each Phthalate (0.005%)

LIST OF RESTRICTED PHTHALATES		
Number	Chemical Name	CAS Number
1.	Butyl benzyl phthalate (BBP)	85-68-7
2.	Dibutyl phthalate (DBP)	84-74-2
3.	Di(2-ethylhexyl) phthalate (DEHP)	117-81-7
4.	Di-iso-nonyl phthalate (DINP)	28553-12-0 & 68515-48-0
5.	Di-iso-butyl phthalate (DIBP)	84-69-5
6.	Di-n-pentyl phthalate (DPENP or DnPP)	131-18-0
7.	Di-n-hexyl phthalate (DHEXP or DnHP)	84-75-3
8.	Dicyclohexyl phthalate (DCHP)	84-61-7

RESULTS:





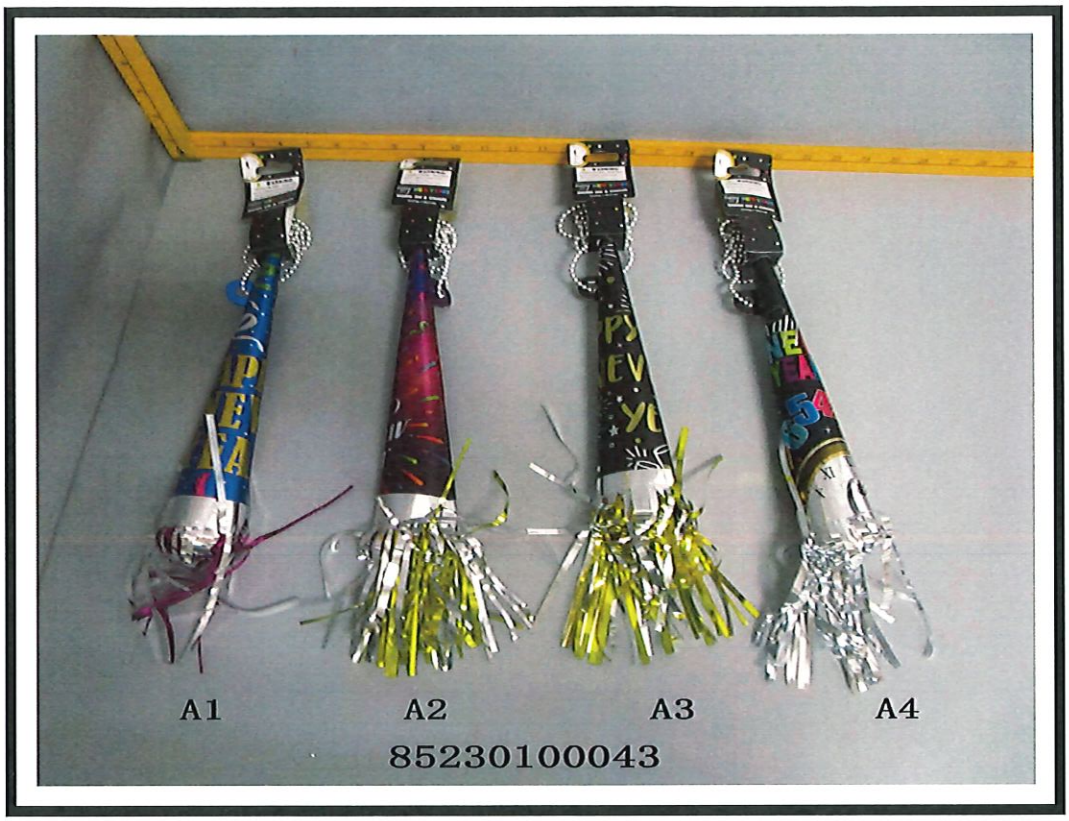
END OF REPORT

G24461N

REPORT

Technical Report: (8523)010-0043

January 13, 2023



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TEST REPORT

SILVER TIMING LTD.
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LAB LOCATION: SHENZHEN
LAB NUMBER: (8523)010-0043

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DATE IN: January 10, 2023
MOD. LOG IN: /
DATE OUT: January 13, 2023
REVISED DATE: /
WORKING DAYS: 4
PAGE: 2 OF 4

OVERALL RATING	
PASS	X
FAIL	
DATA	

TESTING FOR
CPSD-AN-08443-USA-3 STAR
NON-CPSIA REQUIREMENTS SUPPLEMENT

Sample Description:	PARTY HORN NEW YEAR 13.5IN ON*								
Manufacturer:	/			**P.O. No.:**	7070				
Buyer:	OWN NAME			**Style:**	/				
Country of Origin:	CHINA			**Country of Destination:**	USA				
Color:	/			**SKU Number:**	G24461N				
Re-test:	**Yes:**		**No:**	X	**Charge Vendor:**	**Yes:**	X	**No:**	
Previous Report No.:	/								

EXECUTIVE SUMMARY:

SUMMARY OF TEST RESULTS

TEST REQUESTED	CONCLUSION	REMARK
Lead content in surface coating	PASS	See attached result
CA PROP 65	NA	See remark

REMARK(S):

1. See enclosed protocol(s) for the test results.

2. As per client's request, only below tests were conducted in this report:
   - Lead content in surface coating
   - CA PROP 65

3. The submitted sample did not contain any material which is under the scope of CA Prop 65. Therefore, no testing under CPSD-6572-USA protocol was conducted in this report

NOTE: If there are questions or concerns regarding above report, please contact the appropriate lab persons.

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BUREAU VERITAS SHENZHEN CO., LTD

LARRY CHING
SENIOR MANAGER – HARDLINES DIVISION

BUREAU VERITAS

BV Lab Number:	(8523)010-0043
Technician Name:	FANCY
Test Date:	JANUARY 13, 2023
Reviewed By/Date:	FANCY/JANUARY 13, 2023
	Page 4 of 4

Protocol Number	CPSD-AN-08443-USA-3 STAR	**Version**	12
Protocol Description	NON-CPSIA REQUIREMENTS SUPPLEMENT		
Country	United States		
Scope	This protocol applies to all products Except toys, children products and child care article as defined by CPSIA, all furniture including adult furniture, and household paint.		
Creation Date	20/Oct/2009	**Last Revision Date**	12/May/2022
Client Approval Date		**Approver**	
No. of Sample for testing	6		
No. of Working Days for testing	7		

Keys					
A	Additional Charge For This Test	M	Mandatory	R	Regulatory

	Evaluation	Citation / Method	Criteria	1 Star	2 Star	3 Star	Result	Rating
ANALYTICAL								
A	Total lead in surface coating	CPSC-CH-E1003-09.1	All accessible surface coatings in the as received state on items outside of the scope of 16 CFR 1303 shall not contain lead or lead components in which the lead content is in excess of 90 ppm (0.009%) of the weight of the total content. Note: - Report actual results or include data table within report. - Component testing is allowed. - Based on CPSC SOP, will composite up to 3 colors. If any color in the composite exceeds 80% of the limit (72 ppm), based on the lowest weight component, individual colors will be analyzed. - Non-suspect materials as defined by the Consumer Products Safety Commission under 16 CFR 1500.88 and 16 CFR 1500.91 (d) and (e) will not be tested. It is the vendor's responsibility to ensure compliance to the applicable requirements. Client requirement		X	X	M SEE RESULT TABLE	PASS

END OF REPORT

TOTAL LEAD CONTENT IN SURFACE COATING

☐ **Consumer Product Safety Improvement Act (CPSIA) of 2008"Ban of Lead-containing paint and certain consumer products bearing Lead-containing paint",(16 CFR 1303)**
☐ **Canadian Hazardous Products Act (CHPA), R.S., c. H-3, Schedule I, Part 1, Item 2**
☒ **Client's total lead in surface coating**

☐ NO COMPOSITE ☒ COMPOSITE

Element:				Lead			
Requirement: Maximum allowable limit:							
☐CPSIA limit :				☐90 mg/kg			
☐CHPA limit:				☐600 mg/kg			
☒Client's limit:				☒90 mg/kg			
Sample Description				Result	Conclusion		
	Color / Component	Location	Style	(mg/kg)	☐CPSIA (90ppm)	☐CHPA (600ppm)	☒Client's Limit 90ppm
1.	All coating (>4colors)	Horn	A4	<10	☐PASS ☐FAIL	☐PASS ☐FAIL	☒PASS ☐FAIL
2.	Shiny silvery coating	Chain	A4	<10	☐PASS ☐FAIL	☐PASS ☐FAIL	☒PASS ☐FAIL
	Bright shiny silvery coating	Ribbon	A4				

LT = Less Than *mg/kg = milligrams per kilogram (ppm = parts per million)*
** = Average of duplicate analyses*

Remark: In some cases, the tested component cannot be tested individually due to overlapped coatings. And it is not considered as "COMPOSITE".

CPSIA Third Party Report (☐COULD/ ☐COULDN'T/☒NO COMMENT) be issued.