

① 20312

② 20362

③ 30059

④ 30061

⑤ 30029

Certification of Compliance Rock 'N Learn, Inc.

Products:

- Packaged CD and printed material in industry standard plastic case and packaged together in RF sealed plastic to be discarded and not used or played with as a children's product. Affects RL901, RL906, RL907, RL908, RL909, RL910, RL911, RL914, RL915, RL919, RL925, RL926, RL929, RL932, RL933, RL934, RL941, RL953, RL957, RL959, RL960 (identical components, materials, manufacturing processes, and dates of manufacture and assembly; intellectual content is only distinguishing difference)

Certification Requirements:

- This product complies with all applicable rules, bans, standards, or regulations under any statute enforced by the Consumer Product Safety Commission, as are currently effective. CPSA §102(a)(1).
- CPSIA §101 - 16 CFR Part 1303.1 - Lead in Paint & Surface Coatings
- CPSIA §101 - Lead in Substrate of Children's Products

*based on a reasonable testing plan, regarding currently effective requirements and without conceding the applicability of any specific requirements

Manufacturers:

Evatone, Inc. 4801 Ulmerton Road, Clearwater, FL 33762 • (727) 572-7076
Lenco PMC, 10240 Deer Park Road, Waverly, Nebraska 68462 • (402) 786-5050
WikoffColor, 1886 Merritt Rd., Fort Mill, SC 29715 • (803) 548-2210

Based on results provided by our manufacturers involving reasonable testing programs commissioned by our manufacturers, Rock 'N Learn, Inc. certifies that this product is free from lead and that any plastics used in this product do not contain added phthalates. This product meets or exceeds the hazardous material requirements of the Consumer Product Safety Improvement Act of 2008 (CPSIA). Subsection 108 of CPSIA prohibits the manufacture, import, distribution, or sale of children's toys or child care articles containing more than 0.1% of benzyl butyl phthalate (BBP), dibutyl phthalate (DBP), or di-(2-ethylhexyl) phthalate (DEHP), on products manufactured after February 10, 2009. DVD and CD products have been widely distributed in the United States without presenting safety concerns; Rock 'N Learn, Inc.'s sole use of a domestic manufacturing facility that adheres to ISO standards further insures the safety of these products. To maintain the highest possible quality control and safety, Rock 'N Learn, Inc. has refrained from using any printing or production facility located outside the United States. Moreover, Rock 'N Learn products are free from any components that could be potentially swallowed by a child up to six years of age. Rock 'N Learn product parts cannot be mouthed as specified in the criteria for toys under current CPSC guidelines.

Records Contact:

Richard Caudle, President, Rock 'N Learn, Inc. 105 Commercial Circle, Conroe, Texas 77304
richard@rocknlearn.com • (936) 539-2731, ext. 15

Place of Manufacture/Assembly:

- 4801 Ulmerton Road, Clearwater, FL (manufacture and all assembly)
- 10240 Deer Park Road, Waverly, NE (manufacture of plastic components)
- 1886 Merritt Rd., Fort Mill, SC 29715 (manufacture of all inks)

Date(s) of Manufacture/Assembly:

Manufactured: May 2008, January 2009; Assembled: November 2008, December 2008, January 2009

Independent Product Testing Date(s) & Location(s):

06/07/08

Applied Technical Services, Incorporated
1049 Triad Court, Marietta, Georgia 30062
(770) 423-1400

Other Information Supporting Compliance:

from January 8 CPSC communication:

“The new safety law does not require resellers to test children’s products in inventory for compliance with the lead limit before they are sold. However, resellers cannot sell children’s products that exceed the lead limit and therefore should avoid products that are likely to have lead content, unless they have testing or other information to indicate the products being sold have less than the new limit.” —U.S. Consumer Product Safety Commission, Office of Information and Public Affairs, January 8, 2009

The key phrase here is: “testing or other information to indicate...” Rock ’N Learn products have sufficient information to indicate total compliance.

ISO certification ensures that a manufacturing plant is following a defined set of safety and quality control procedures. ISO includes consumer product safety standards and banned materials, which would meet the criteria of a “reasonable testing program” as specified by CPSIA. Rock ’N Learn, Inc. uses only ISO certified manufacturers of its product, based in the United States.

ISO certification does not allow for the use of any banned substances. Four-color printing ink from the United States does not contain lead. Some printing inks manufactured overseas, with high metallic luster, have been shown to contain high levels of lead. With four-color ink manufactured in the U.S., there should be no reason for additional testing. Laws banning lead in printer inks have been in place for decades, with stiff penalties for violation.

Phthalates would not be added to optical discs; that would defeat the purpose of rigidity that the discs inherently require to function properly. Phthalates add flexibility and a “chewy” quality to plastics. A manufacturer would not want this quality in an optical disc. Similarly, cases for DVDs and CDs must provide rigidity and a sturdy quality to protect the discs from damage during transit and storage.

CPSIA is being misinterpreted in many instances, according to the Toy Industry Association (TIA). CPSIA was never intended to require unnecessary testing of all children’s products. That would overtax laboratory resources that need to be available for products that present a genuine concern. “While CPSC expects every company to comply fully with the new laws resellers should pay special attention to certain product categories. Among these are recalled children’s products, particularly cribs and play yards; children’s products that may contain lead, such as children’s jewelry and painted wooden or metal toys; flimsily made toys that are easily breakable into small parts; toys that lack the required age warnings; and dolls and stuffed toys that have buttons, eyes, noses or other small parts that are not securely fastened and could present a choking hazard for young children.” — from CPSC source cited above, January 8, 2009

Yes, CPSIA requires that CDs, DVDs, and printed material not exceed the limits of lead or phthalates, if potentially used by a child 12 and under. However, “testing or other information” would include ISO certification of a facility and affirming that only domestically produced 4-color inks are used. Logically, if phthalates would greatly detract from the functionality of a product, they are not going to be in the products. Therefore, testing for phthalates in CDs, DVDs, and storage cases would constitute “unreasonable testing” procedures by unnecessarily submitting these products to a lab for testing.

Rock ’N Learn cases have been tested for lead levels by the manufacturer using an independent accredited lab, and Rock ’N Learn, Inc. maintains a copy of those results on file. We also maintain certification of the contents of the inks from the manufacturer of our products.

Our manufacturers also maintain Material Data Safety Sheets (MSDS), which document all chemicals used in the manufacturing process, readily available in the event of an audit.