



Re: CPSIA

We have received questions concerning the federal Consumer Product Safety Improvement Act of 2008 in regard to “children’s products”. This letter will provide you with general information about certain aspects of the law as they pertain to our product. For more information you can go to the U.S. Consumer Product Safety Commission website at <http://www.cpsc.gov/ABOUT/Cpsia/overview.html>

Our products are designed to be compliant with all consumer product safety requirements applicable to our products that are currently in effect. At Peerless, we strive to produce quality and safe products.

According to the CPSC’s guidance, a “children’s product” is one designed or intended primarily for children 12 years of age or younger. None of the products that we sell to you is a consumer product designed or intended primarily for children 12 years of age or younger. Rather, all of the products that we sell to you are designed for business and corporate use by adults. This is apparent from our marketing of our products and the logos that we place on the products.

Since we do not control “downstream” distribution and sale of our products we offer the following suggestions for your consideration. The product should be decorated, packaged, displayed, promoted and advertised in a manner consistent with its logo to make clear that it is intended only for business and corporate use. The product should not be decorated or promoted in such a way that could indicate it is intended for use by a child.

Please note that according to a 1/8/09 news release on the CPSC website: as of February 10, 2009, children's products cannot be sold if they contain more than 600 parts per million (ppm) total lead. Certain children's products manufactured on or after February 10, 2009 cannot be sold if they contain more than 0.1% of certain specific phthalates or if they fail to meet new mandatory standards for toys. Under the new law, children's products with more than 600 ppm total lead cannot lawfully be sold in the United States on or after February 10, 2009, even if they were manufactured before that date. The total lead limit drops to 300 ppm on August 14, 2009. The new law requires that domestic manufacturers and importers certify that children's products made after February 10 meet all the new safety standards and the lead ban.

Again, the products that we sell to you are not children’s products and are not intended or designed for children. Also, given the limits mentioned above, it is possible that we could have some product that would not comply with such limits if it were a children’s product. It is important that we are notified as soon as possible if an order is intended for children 12 years and younger.