


Protocol 337-E

Battery Operated Scale

Test Property	Test Method	Samples	Test Principle/Requirements	Rating (Section or Executive Summary which failed items can be referenced)
LABELING				
Labeling / Packaging Review	FPLA 16 CFR 500 & 19 CFR 134	All Samples	Should be legibly marked with the following information: - Distributor's name, trademark or other means of identification of the manufacturer or packer & address (City, State & Zip) - Product identification - Net quantity of the contents in terms of weight, measure or numerical count (Metric & US Standard) or a combination so as to give accurate information and facilitate value comparison by the consumer - Country of origin (if imported)	
Verify Label Claims	Visual Check	All Samples	Examine the retail packaging (or submitted artwork). Record each objective (factual) claim which can be substantiated by the testing within this protocols and rate accordingly. Any net quantity/dimensional claims evaluated in other sections of this protocol need not be recorded. All other claims (subjective and objective) shall not be recorded or evaluated.	
Adult Tracking Label: **If space limitations exist, contact Kohl's Quality Assurance & Product Integrity teams to discuss minimum required information: (quality.assurance@kohls.com).**	Kohl's Requirement	All Samples	Kohl's Assigned Factory Number Manufacture Date (Month/Year) UPC #	
User Manual /Important Safety Instructions/Assembly Instructions.	Visual Check	All Samples	Instructions and warnings shall be provided in the user manual identifying reasonable foreseeable uses or misuses of the product. It shall also include instructions regarding the installation, use, safety and maintenance. All accessories shall be described in the user's manual and provided with instructions for proper use	
Packaging / Product (Shall Be Permanently Marked on Battery Compartment)	Visual Check	All Samples	- Size of battery - Polarity of battery - Voltage of battery	
FCC part 15 rules (if applicable)	Document Check	All Samples	FCC part 15 report shall be provided for verification if the operating frequency > 9kHz for AC, or operating frequency > 1.705MHz for Battery operated product.	

FCC Part 15 marking and instruction (if applicable)	Visual Check	All Samples	<p>Marking shall include: - "This device complies with Part 15 of the FCC Rules.</p> <p>Operation is subject to the following two conditions: (1) this device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation."</p> <p>Instruction manual shall include: "Warning: Changes or modifications to this unit not expressly approved by the party responsible for compliance could void the user's authority to operate the equipment."</p> <p>"NOTE: This equipment has been tested and found to comply with the limits for a Class B digital device, pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference in a residential installation. This equipment generates uses and can radiate radio frequency energy and, if not installed and used in accordance with the instructions, may cause harmful interference to radio communications.</p> <p>However, there is no guarantee that interference will not occur in a particular installation. If this equipment does cause harmful interference to radio or television reception, which can be determined by turning the equipment off and on, the user is encouraged to try to correct the interference by one or more of the following measures: - Reorient or relocate the receiving antenna. - Increase the separation between the equipment and receiver. - Connect the equipment into an outlet on a circuit different from that to which the receiver is connected. - Consult the dealer or an experienced radio/TV technician for help."</p>	
Packaging / Instructions	ANSI C18.1M Part 2-2017 (modified)	All Samples	For products with more than one battery, must include: "Do Not Mix Old And New Batteries. Do Not Mix Alkaline, Standard (Carbon - Zinc), Or Rechargeable (Nickel - Cadmium) Batteries"	
	Visual Check	All Samples	Should provide use, care, and maintenance information, as well as disposal of batteries information	
US PL 104-142 Mercury in Batteries	Battery Act, Public Law 104-142	All Samples	Alkaline-manganese batteries, alkaline-manganese button cell batteries, zinc-carbon batteries, mercuric-oxide button cell batteries shall conform to respective requirements.	

Rechargeable Batteries (If Applicable)	Battery Act	All Samples	<p>Rechargeable cell batteries must be labeled</p>  <p>Nickel-Cadmium Batteries Must Be Labeled "Nickel-Cadmium" or "Ni-Cd," with the phrase "BATTERY MUST BE RECYCLED OR DISPOSED OF PROPERLY." Regulated Lead-Acid Batteries Must Be Labeled "Pb" or with words "LEAD," "RETURN", and "RECYCLE" and if the regulated batteries are sealed, the phrase "BATTERY MUST BE RECYCLED." Non Removable Regulated Lead-Acid Batteries Must Be Labeled With the Phrase "CONTAINS SEALED LEAD BATTERY. BATTERY MUST BE RECYCLED."</p>	
Battery product compartment design guidance	Visual Check	All Samples	<p>Shall have the following permanent markings visible when replacing batteries:</p> <ul style="list-style-type: none"> - Size of battery / type / designation - Direction of polarity in battery compartment - Nominal voltage - Number of batteries required 	
*Reese's Law Supplemental Protocol	Refer to Protocol 1700	All Samples	All samples shall be reviewed against the requirements of Reese's Supplement Protocol to determine if additional testing or labeling is required	
PHYSICAL CHARACTERISTICS				
Dimensions (LxWxH) (In.)	FPLA/ UPLR	3 Samples	Report dimensions, shall meet the label claims (If applicable)	
Overall Weight	General Measurement	All Samples	Report weight, shall meet the label claims (If applicable)	
Defects	Visual Check	All Samples	Shall have no discernible surface degradation, including crazing, shivering, bubbles, cracks, stains, deformations, chips, fractures, heavy lines, waves, shear marks, scratches, scuff marks, indentations, or blisters.	
PERFORMANCE				
Functionality	Actual Use	All Samples	Shall function as intended as received and after abused test. Failure on either of these states constitutes a fail of this clause. Report details of evaluation (features tested/methods used/materials used/etc) for features not already covered by other clauses but described in instructions/labels; also report those described features not evaluated.	
Ease of Installation	Actual use	All Samples	Follow the instructions for assembly and disassembly the product; and comment on the method of the installation. Parts shall not be easy to break during normal use.	
Ease of Cleaning	Actual use	All Samples	Follow the instructions to clean up the unit. Comment on the method of cleaning.	
Scale Range & Increment	Visual Check	1 Sample	As Specified / Claimed	

Accuracy of Scale	In-house method	1 Sample	Less than 100 Lbs – within ±5% More than 100 Lbs – within ±3%	
Repeatability	In-house method	1 Sample	All readings must be within ±2%	
Ease Of Calibration	Actual Use	1 Sample	Shall Be Easy To Calibrate	
Flammability	16 CFR 1500.44	1 Sample	Less than 0.1"/sec.	
Switch (If applicable)	Actual Use	1 Sample	Shall be no lossening or failure of the switch after the below number of times of operation Tier 1: 100 times Tier 2: 150 times	
Humidity Test	Kohl's TM 31	1 Sample	No failure at 95% RH at 100 F (38 C) for below defined hours Tier 1 & Tier 2: 24 hours	
Reverse Voltage Test	Visual	1 Sample	For replaceable batteries, reversing battery orientation shall not damage unit. Report discrepancies	
Resistance to corrosion	ASTM B117-11 modified	1 Sample	[Applicable to samples / sample components constructed of metal or samples with metallic coatings that can be exposed to the environment] Shall withstand 24 hours in 1% salt spray (fog) with no noticeable oxidation / corrosion / visual changes. Modification = 1% salt spray (fog).	

ANALYTICAL

*Food contact materials (Plastic)	FDA 21 CFR 175/177	All Sample	Must Comply With Regulations Of US FDA Food Simulating Solvent And Extraction	
*Chromium (Cr) Content Applicable to stainless steel food contact items sold for non-cooking purpose only	Acid digestion / ICP or AAS	All Sample	Recommendation for Generally Recognized as Safe (GRAS) Minimum 16% chromium content	
*FDA Food Contact Safety Test Applicable to food contact materials	21 CFR 170-190	All Sample	FDA food contact material requirement	
*FDA Food Contact Safety Test Applicable to Ceramic or glass (Interior)	With reference to FDA CPG Sec. 545.450 and CPG Sec. 545.400	All Sample	FDA CPG Sec. 545.450 and CPG Sec. 545.400 -Leachable Lead & Cadmium	
*Lead In Scrapable Surface Coating	ASTM E1613/E1645	1 Sample	≤90 ppm (0.009% by weight).	
* CA Prop 65	Refer to Protocol 1300	All Samples	All samples shall be reviewed against the requirements of California Proposition 65 to determine if additional testing or labeling is required.	

PRICING AND ADDITIONAL NOTE:

***Please refer to Kohl's preferred third party labs for individual pricing and sample size**
In addition to this protocol, any products designed for, intended for or appealing primarily to children, requires additional testing per Kohl's Testing Protocol # 601.

Protocol Version	Description of Change	Revised by/Date	Approved by/Date
337-A	Initial Release	Jerry Chen April 14, 2016	Jerry Chen April 14, 2016
337-B	Revised the protocol version from 01 to 337-A, Add two test item of FDA Food Contact Safety Test, and revised the stainless steel food contact items of FDA.	Jerry Chen April 22, 2016	Elizabeth Armstrong April 25, 2017
337-B	Updated test method for food contact materials for typo	Elizabeth Armstrong May 26, 2017	Elizabeth Armstrong May 26, 2017
337-C	Updated packaging instructions, battery product compartment design guidance, resistance to corrosion, and FDA food contact requirements.	Charlene Swanson Nov. 2020	Charlene Swanson Nov. 2020
337-D	Added Reese's Law Supplemental Protocol test line under Label Verification	Kevin Makocy November 2023	Kevin Makocy November 2023
337-E	Removed Tier 3 testing requirements	Charlene Swanson October 2024	Charlene Swanson October 2024