

evenflo

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Mrs. Kelly Schuler
National Highway Traffic Safety Administration
400 Seventh St., S.W.
Washington, DC 20590

RE: Safety Recall Campaign 01^c-019 (Joyride)

Dear Mrs. Schuler:

I have received your fax regarding safety campaign 01^c-019. Your fax points out that NHTSA considers the completion rate (effectiveness) of Evenflo's campaign, 1.6% at the end of Q3 2001, to be low and requests "a meaningful increase in future reporting quarters."

As you may be aware, the Joyride car seat has not been sold in the United States for over three years. Moreover, when it was sold in the U.S., the average retail price was around \$30. In addition, both the industry and NHTSA have recommended car seats not be used once they become six years old (a majority of Joyride car seats are now over six years old). Based upon this, it is reasonable to assume that the vast majority of Joyrides have been discarded by consumers and are no longer in use. Moreover, you will find that this response rate is similar for all of the car seats that have been recalled for similar complaints. I would also point out that this campaign received significant and widespread coverage in the news media including the banner headline in USA Today. As such, it is not likely that Evenflo could appreciably increase the effectiveness of the campaign.

Please note that apparently because the alleged Joyride failures occurred outside of the vehicle, the Consumer Product Safety Commission asserted jurisdiction in this matter. Evenflo was very open from the beginning that, though both NHTSA and CPSC were involved in discussions concerning this campaign, Evenflo could not allow itself to be put in the position of reporting to both agencies. Evenflo did agree, however, to supply NHTSA with copies of our reports to CPSC strictly for informational purposes (and has continued to do so). As such, I can neither acknowledge nor decline your request other than to take it under advisement.

If you have any questions, please don't hesitate to call me. Thank you for your time and attention to this matter.

Sincerely,



Russ Butson