



U.S. Department of Transportation
**National Highway Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

November 5, 2012

Mr. Ken Wittenauer
Vice president and General Counsel
Britax Child Safety, Inc.
13501 South Ridge Drive
Charlotte, NC 28273

NVS-215KS
12C-004

Subject: Possible Choking Hazard

Dear Mr. Wittenauer:

This letter serves to acknowledge Britax Child Safety, Inc.'s notification to the National Highway Traffic Safety Administration (NHTSA) of a safety recall which will be conducted pursuant to Federal law for the product(s) listed below. Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

Makes/Models/Model Years:

BRITAX/ADVOCATE 70 G3/9999
BRITAX/BOULEVARD 70 G3/9999
BRITAX/PAVILION 70 G3/9999

Mfr's Report Date: November 2, 2012

NHTSA Campaign Number: 12C-004

Components:

CHILD SEAT: HARNESS

Potential Number of Units Affected: 55,455

Problem Description:

Britax is recalling certain convertible child restraints, models Boulevard 70 G3, Advocate 70 G3, and Pavilion 70 G3, Model Numbers: E9LJ91A, E9LJ91M, E9LJ91S, E9LJ92E, E9LJ93P, E9LJ93S, E9LK91A, E9LK31A, E9LK31Q, E9LK32D, E9LK32Z, E9LK33Q, E9LL11A, E9LL11Q, E9LL12D, E9LL12Z, E9LG81A, E9LG83N, E9LG83P, E9LG83X, E9LG83Y, E9LL21A, E9LL23P, E9LL23Y, manufactured from June 11, 2012, through August 31, 2012. These seats were manufactured with a softer chest pad material that may be bitten or chewed into pieces by a child using the seat.

Consequence:

If the child bites off a piece of the softer pad, it could be a choking hazard, resulting in injury or death.

Remedy:

Britax will provide owners with replacement HUGS pads that are made from a firmer material and instructions on how to replace the pads free of charge. To view a video on how to remove and replace the HUGS chest pads visit www.BritaxUSA.com/support/safety-notice and select the product from the menu on the right side. The safety recall is expected to begin shortly. Owners may contact Britax Customer Service Department at 1-888-427-4829 with questions or to request replacement pads in the event their restraint is not already registered with Britax.

Notes:

Owners may also contact the National Highway Traffic Safety Administration Vehicle Safety Hotline at 1-888-327-4236 (TTY 1-800-424-9153), or go to www.safercar.gov.

Please be reminded of the following requirements:

Copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

As stated in Part 573.7, submission of the first of six consecutive quarterly status reports is required within one month after the close of the calendar quarter in which notification to purchasers occurs. Therefore, the first quarterly report will be due on, or before, 30 days after the close of the calendar quarter.

Your contact for this recall will be Kelly Schuler who may be reached by phone at (202) 366-5227, or by email at kelly.schuler@dot.gov or through the office email at rmd.odi@dot.gov. We look forward to working with you.

Sincerely,



Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigations
Enforcement