



RECARO North America, Inc 4120 Luella Lane Auburn Hills, MI 48326

Daniel C. Smith
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attn: Recall Management Division (NVS-215)
1200 New Jersey Avenue S.E.
Washington, DC 20590

Your message SAFETY RECALL NOTIFICATION
Your reference Michael Murto
Our reference Director Engineering
Organization ID RECARO North America, Inc.
Department Engineering

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Date 2009-04-13
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09C-002 Amendment – 13-April-2009

Subject: **SAFETY RECALL NOTIFICATION**

Dear Mr. Smith,

On April 9th, 2009 RECARO North America, Incorporated decided to amend recall 09C-002. The population in the notification of February 24th, 2009, relating to motor vehicle safety, has been expanded to include RECARO Signo and Como child restraint systems manufactured from Nov 1st, 2007 until February 16th, 2009.

RECARO is filing this amended Defect Information Report in compliance with 49 CFR 573.

§ 573.6(c)

(1) *The manufacturer's name:*

RECARO North America, Inc.
4120 Luella Lane
Auburn Hills MI 48326

Contact: Michael W. Murto

Phone: 248-340-1183

Email: mike.murto@recarousa.com

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OFFICE OF DEFECTS
INVESTIGATION

(2) Identification of the items of motor vehicle equipment potentially containing the defect:

Signo child restraint systems manufactured from February, 2008 to September, 2008.

Signo Models:	Cobalt	330.00.MM58, & 330.01.MM58
	Midnight Desert	330.00.MM14, & 330.01.MM14
	Sand	330.00.MM34, & 330.01.MM34
	Blush	330.00.MM5A, & 330.01.MM5A

Como Models:	Cobalt	331.00.MM58, & 331.01.MM58
	Midnight Desert	331.00.MM14, & 331.01.MM14
	Sand	331.00.MM34, & 331.01.MM34
	Blush	331.00.MM5A, & 331.01.MM5A

(3) The total number of child restraint systems potentially containing the defect:

	27-Feb-09 notification	13-April-09 notification	Total
Signo:	5,444 Child restraint systems	908 Child restraint systems	6,352 Child restraint systems
Como:	none	6,363 Child restraint systems	6,363 Child restraint systems

(4) The percentage items of equipment estimated to actually contain the defect:

Less than 0.07 %

(5) A description of the defect:

Brief Description: A metal adjuster (A lock) controls the tightness of the shoulder harness in the child seats. A mechanical spring, located inside the locking cam, was either manufactured outside the dimensional requirements of the released drawing, or was deformed during assembly of the metal adjuster. The central front adjuster strap on those seats containing the incorrectly manufactured spring will slip within the metal adjuster (A lock) and this prevents the harness from being securely tightened. If this condition existed and a vehicle crash occurred, the child would not be securely fastened to their child restraint system and may sustain an injury. The defect exists at the time of delivery and RECARO believes that it is immediately recognizable by the consumer when securing a child.

(6) A chronology of events that were the basis for the determination that the defect related to motor vehicle safety:

In January 2009, RECARO North America received its first customer complaints regarding the A-lock not functioning properly. RECARO requested the return of the product for root cause analysis. All the seats were unused, as the defect was noticed by the consumers prior to the seat being used in the field.

Upon receipt of the returned seats, February 2009, RECARO verified the complaints and initiated our complaint management process which included contacting the manufacturer of the seat assembly and its relevant sub-component suppliers.

In February 2009, RECARO embargoed the seat complete inventories and began re-inspection. All seats are re-inspected prior to shipment. All A-lock assemblies, components, and in-process materials have been inspected and rechecked by our vendor and their sub-suppliers. The spring manufacturing process and stocks were re-checked and equipment's capability was re-confirmed.

Results:

- Defective Child Seats Discovered = Zero;
- Defective A-Locks Discovered = Zero;
- Defective Springs Discovered = Zero.

February 2009, a Root Cause Analysis Results is still pending

February 2009, last shipment from RNA without inspection

March 2009, investigation by the A-lock vendor, Holmbergs Childsafety Co. Ltd., did not identify root cause. The vendor has not been cooperative in our continued attempts to find the root cause of the defect.

March 2009, RECARO hires Metallurgical Engineering and Testing company to support investigation process.

March 24th 2009, Defect was observed in a Signo child restraint outside of the manufactured date range.

March 25th 2009, Defect was observed in a Como child restraint system.

April 2009, RECARO amends recall timeframe and includes Como child restraint.

April 2009, root cause still under investigation. All observations and current investigations indicate that the defect cause occurs prior to use in the field and that the defect is 100% detectable by the consumer.

(8)(i) A description of the manufacturer's program for remedying the defect or noncompliance.

RECARO is of the opinion that the defect is 100% detectable by the consumer prior to use.

RECARO has implemented a 100% inspection of all goods, (containment actions implemented).

RECARO will contact consumers and dealers requesting they inspect the product. RECARO will replace any product containing the defect.

(ii) The estimated date(s) on which it will begin sending notifications to owners, and to dealers and distributors:

RECARO Dealer notification letter:	March 2009, amended April 2009
RECARO announcement notification letter:	March 2009, amended April 2009
RECARO Inspection Instructions	March 2009, amended April 2009

(10) A representative copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and are sent to more than one manufacturer, distributor, dealer or purchaser. These copies shall be submitted to NHTSA's Recall Management Division (NVS-215) (RMD), not later than 5 days after they are initially sent to manufacturers, distributors, dealers, or purchasers. Submission shall be made by any means, including those means identified in §573.9 of this part, which permits the manufacturer to verify promptly that the copy was in fact received by RMD and the date it was received by RMD.

Please see attached documents: Dealer Letter, Announcement Letter, Inspection instructions.

(11) The manufacturer's campaign number, if not identical to the identification number assigned by NHTSA.

RECARO North America intends to use the NHTSA campaign number, 09C-002.

§ 573.13— Reimbursement for pre-notification remedies.

All subject Child Restraint Systems are still under warranty, so RECARO is not implementing a pre-notification reimbursement plan.

Kind regards,



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Cc: Fax to George Person (202-366-7882)