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(12 pages)

Form Approved: O.M.B. No. 2127-0004

Safety Defect and Noncompliance Report Guide for Equipment
PART 573 Defect and Noncompliance Report¹

On November 22, 2006, Compass [MFR] decided that (a defect which relates to motor vehicle safety)(a noncompliance with Federal Motor Vehicle Safety Standard No. 213) exists in items of motor vehicle equipment listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports.

Date this report was prepared: December 3, 2006

Furnish the manufacturer's identification code for this recall (if applicable): _____

1. Identify the full corporate name of the fabricating manufacturer/brand name/trademark owner of the recalled item of equipment. If the recalled item of equipment is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

Compass 3430 South Dixie Highway Suite 301 - Kettering, Ohio 45439

Contract manufacturer - Lerado - North Dongsheng Road - Zhongshan Guangdong Prov. China

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

Jody Malone - Project Manager

Telephone Number: 1-937-293-9120 ext.105 Fax No.: 1-937-293-9130

Name and Title of Person who prepared this report.

Jody Malone

Project Manager

¹Each manufacturer must furnish a report, to the Associate Administrator for Safety Assurance, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part 573, "Defect and Noncompliance Reports" and also outlines information currently requested. Any questions, please consult the complete Part 573 or contact Mr. Jon White at (202) 366-5226 or by FAX at (202) 366-7882.

Signed: Jody M. Malone 12-04-06

I. Identify the Recalled Items of Equipment

2. Identify the Items of Equipment Involved in this Recall, for each make and model or applicable item of equipment product line (provide illustrations or photographs as necessary to describe the item of equipment), provide:

Generic name of the item: Infant Child Restraint

Make: Compass Model: I420-ARD, I420-FUO & I420-MAR

Part Number: _____ Size: _____

Function: _____

Other information which characterizes/distinguishes the items of equipment to be recalled:

Make: _____ Model: _____

Part Number: _____ Size: _____

Function: _____

Other information which characterizes/distinguishes the items of equipment to be recalled:

Make: _____ Model: _____

Part Number: _____ Size: _____

Function: _____

Model Years Involved: _____

Other information which characterizes/distinguishes the items of equipment to be recalled:

Make: _____ Model: _____

Part Number: _____ Size: _____

Function: _____

Other information which characterizes/distinguishes the items of equipment to be recalled:

The Date of Manufacturing appears on the unit and on the packaging.

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Widgets equipped with certain items of equipment from January 1, 1996, through April 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period.

II. Identifying the Recall Population

3. Furnish the total number of items of equipment recalled potentially containing the defect or noncompliance.

Model	Year	Number of Items Potentially Involved
I420-ARD	2006	680
I420-FUO	2006	680
I420-MAR	2006	300

Total Number Potentially Affected by the Recall:

1660

4. Furnish the approximate percentage of the total number of items of equipment estimated to actually contain the defect or noncompliance: 10 TO 15 %

Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled items of equipment: Compass had a random crash test failure. Upon examination of units of the same DOM an assembly error was found.

2 additional test were conducted and confirmed the non compliance. A search of inventory of defect vs. non defective was used to determine the % rate.

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

The crotch anchor which is located on the bottom of the I420 infant seat was installed incorrectly on about 10 to 15% of the units manufactured during initial start of manufacturing for the I420.

See attachment 1

Describe the cause(s) of the defect or noncompliance condition.

Assembly error

Describe the consequence(s) of the defect or noncompliance condition.

The crotch anchor can become dislodged during a FMVSS 213 crash test, which can allow the dummy to travel up the seat back causing breakage in the upper seat back and a seat back rotation non compliance.

No reports or call from consumers have been recieved relating to the defect.

Identify any warning which can (a) precede or (b) occur.

na

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

na

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:
na

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.

See attchment 2 for Chronological order and dates

See attachemnt 3 Which will include the MGA test report.

V. Identify the Remedy

8. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

The root cause of the defect is an assembly error and is not design realted.

The incorrect crotch anchor position will be corrected with a repair kit which will include instructions and a screw driver to correct the defect.

See attchent 4 for Remidiation

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

No production has taken place since the condition was indentified. The manufacturing facility has been notified and has taken corrective action to eliminate the defect in the future..

VI. Identify the Recall Schedule

Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.

Compass wants expedite the schedule on a mutually agreeable schedule.

Compass would like to have the announcement before Christmas.

VII. Furnish Recall Communications

9. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. A *DRAFT* copy of the

Note: As commincation and bulletins become available the items will provided to NHTSA.

notification documents should be submitted to this office by Fax (202-366-7882) for review prior to mailing.

Note: These documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.

The Privacy Act of 1974 - Public Law 93-579, As Amended: This information is requested pursuant to the authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response maybe used to assist the NHTSA in determining whether a manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administration enforcement or litigation against a manufacturer, your response, or statistical summary thereof, may be used in support of the agency's action.

Compass I420 Issue Containment

Number of units produced in May, 06

ARD	680	DOM Affected	05/07/06 & 05/15/06
FUO	680	“	05/07/06 & 05/13/06
MAR	300	“	05/07/06 & 05/13/06
Total	1660		

Inventory on Hand from May, 06

ARD	OH	48
	CA	181
FUO	OH	45
	CA	53
MAR	OH	99
	CA	1

Total On Hand

427

Total Exposure in Field

1233

Containment by Date

An inspection of inventory was conducted after the crash test of the same DOM. The condition that caused the crash test failure was found on units from the above DOM's DOM's from June, 2006 did not have the condition that was found in the May, 2006 production.

The I420 was not produced before May, 2006.



Attachment 2

Chronological Order of Events

- 1-Compass received word from MGA research of a potential failure. DATE 11/13/06
- 2-Compass researched inventory DOM of the I420-MAR in question. 11/15& 11/16/06
- 3-Discovered a potential root cause for the failure. (Crotch anchor not installed correctly)
- 4-Crash tested 2 units at MGA research on 11/22/06 and confirmed non compliance.
- 5-Review MGA test report and footage to determine a noncompliance existed. 11/28/06.
- 5-Compass determined total production and quantity affected. 12/03/06
- 6-Notified NHTSA on 12/04/06

Remediation

Registered Owners

Compass will send the 50 registered owners a repair kit on a date that is mutually agreeable.

A picture based work instruction draft will be completed on 12/6/06.

Non Registered Owners

Compass will send the owners a repair kit or direct the owners to the work instructions on the www.compassbaby.com website to complete the defect correction.

Retailer

Compass will offer the following;

- 1-Return affected inventory and replace with unaffected inventory.
- 2-Offer to sort inventory at retailer's warehouse and return affected inventory.
- 3-Rework stock at retailers and mark with Quality checked label on carton and on units.
- 4-Return affected inventory

In house Inventory

- 1-Sort by DOM- Completed 12/03/06
- 2-Rework and correct defect, 45% completed.