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12C-001
(6 pages)

Jan 26th, 2012

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention Recall Management Division
1200 New Jersey Avenue, SE
West Building
Washington, DC 20590
202-366-4000

RE: 49 Part 573 Report for voluntary recall of Britax Child Safety, Inc. Chaperone Infant Car Seat

Dear Sir or Madam:

For the past several months Britax Child Safety Inc. ("Britax") has continued to monitor consumer complaints related to harness adjusters detaching from the seat shell on certain Chaperone infant car seats. Based upon the review of consumer returns and product analysis, Britax has determined that for a limited number of Chaperone infant car seats manufactured between September 1, 2010 and April 30, 2011, variation in rivet composition used in attaching the harness adjuster to the shell has occurred causing the adjuster to become detached. Pursuant to the requirements of 49 CFR § 573 Britax submits this report having determined that such Chaperone infant car seats may contain a defect in the harness adjuster attachment which could result in the child not being properly restrained in a vehicle crash resulting in a potential increased risk of injury.

Britax also is concurrently filing Notice with Transport Canada as the Chaperone infant car seat was also sold in Canada.

In compliance with 49 CFR 573.6 Britax provides the following information.

1. Manufacturer's name/address:

Britax Child Safety, Inc. (Importer)
13501 South Ridge Drive
Charlotte, NC 28273

Laredo (Manufacturer) located at No 42, Kui Xing Road, Dong Sheng Town, Zhong Shan Guang Dong, P.R. China, 528414

Britax Child Safety, Inc.
13501 South Ridge Drive
Charlotte, NC 28273
USA

Tel: 704-409-1700
Fax: 704-409-1710

A Britax Childcare Group Ltd. company



2. Vehicles or Equipment involved in this defect notification:

Britax Chaperone infant car seats (See product codes and fashions below)

3. Total number of vehicles or items of equipment:

Britax/Laredo manufactured 17,820 Chaperone Infant Car Seats which are included in this campaign with approximately 3600 seats sold in Canada and 14,220 seats sold in the US since September 1, 2010 through April 30, 2011 with no seats remaining in Britax inventory.

4. Approximate percentage of vehicles or equipment estimated to actually contain the defect:

The Chaperone Infant car seat began manufacturing by Laredo on April 11, 2009 and were first imported into the US in June of 2009 with the initial distribution into Canada in August 2009 and into the US market beginning in June of 2009. Units affected by the variation in the rivet attachment of the harness adjuster were manufactured between September 1, 2010 and April 30, 2011. Units manufactured after April 30, 2011 were produced with a tubular rivet rather than the original push rivet and the harness adjusters are secure.

Units manufactured after April 30, 2011 are also **not** included in this campaign.

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Of the 17,820 affected Chaperone Infant Car Seats sold to date and manufactured between September 1, 2010 and May 1, 2011, Britax estimates that approximately 0.18% of the car seats actually contain the defect based upon the 60 car seats that have been reported with a detached harness adjuster.

The Fashion and Product codes for the Chaperone Infant Car Seats are as follows:

Product Code	Fashion	Number of Units
US Affected Units (Manufactured September 1, 2010—May 1, 2011)		
E9L692J	Black/Silver	6480
E9L 692K	Red	2520
E9L692L	Cowmooflage	3780
E9L692M	Green	1440
Canadian Affected Units (Manufactured September 1, 2010 –May1, 2011)		
E9L952J	Black/Silver	1440
E9L952K	Red	900
E9L952L	Cowmooflage	1260

5. Description of the defect:

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The harness adjuster ensures that the harness straps can be properly tightened and secured over the infant shoulders. As originally specified, the harness adjuster was attached to the infant carrier seat shell with a single pop rivet which was installed using a prescribed air pressure range required to secure the rivet correctly. For all Chaperone infant carriers manufactured from the beginning date of production in April 2009 until September 1, 2010, no units have been reported returned with detached harness adjusters.

Beginning on September 1, 2010 and based upon product inspection and testing, it appears that variation in the composition of the aluminum rivets may have resulted in reduced material hardness in the rivets that were then damaged when pressure was applied during harness adjuster attachment to the shell. This resulted in excessive deformation to the rivets and a compromised harness adjuster attachment. Beginning on May 1, 2011, Laredo began using a different type tubular rivet and no units have been reported returned with detached harness adjusters made from April 30, 2011.

The use of the tubular rivet coupled with enhanced quality assurance practices and testing by the manufacturer should prevent this from occurring again.

6. Chronological summary of events leading to this determination:

In March of 2011, Britax began to receive consumer reports of detached harness adjusters from the Chaperone seat when the consumer attempted to tighten

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the harness straps. A review of then available product and quality assurance records disclosed that early production was assembled properly. Britax continued to monitor returns, review production records from Laredo and assess assembly protocols to ascertain the cause of the complaints and confirm that consumer mis-use of the units was not involved.

Based upon extensive review of product returns and production dates, on site testing and review of production protocols, and coupled with an alteration in the type of rivet used beginning after April 30, 2011 Britax has determined the likely cause of the defect and the production affected. To date there have been a total of 57 complaints of harness adjuster detachment from the US and 3 consumer complaints in Canada. There have **not** been any reports of harm or injury received to date.

7. Description of proposed remedy (including schedule for dealer and customer notification):

Britax will shortly submit draft copies of the Retailer and Consumer notices pursuant to FMVSS 577. Britax will make available to retailers and consumers a kit to ensure a secure attachment of the harness adjuster. Britax is prepared to offer the repair kits by Feb 6th, 2012 and until then will continue to replace seats in which the harness adjusters have detached from the units.

It is anticipated that any campaign announcement will also be coordinated with Transport Canada.

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8. Program for remedy campaign (including program for reimbursing any consumer who obtained the remedy at his/her own expense within one year of the opening of the EA, or within one year of this 573 report, whichever is earlier):

Britax will mail the Consumer Notice and Remedy Kits to all registered US consumers beginning on Feb 6th 2012. Information and instructions related to the campaign will be posted on the Britax web site at www.Britaxusa.com and through company sponsored social media no later than Feb 6th 2012.

It is not necessary to reimburse the consumer as the remedy will be provided at no cost and consumers that have a detached harness adjuster will be provided a free replacement unit.

Britax will mail Retailer Notices also beginning on Feb 6th 2012.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Kenneth Wittenauer".

Kenneth Wittenauer
Vice President and General Counsel
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