



5/4/2012

Nancy L. Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Ave. S.E.
Washington, D.C. 20590
Attention: Recall Management Division (NVS-215)

RE: Dorel Juvenile Group 573.6 Noncompliance Information Report – DJG
Institutional Infant Child Restraints

Dear: Ms. Lewis:

Dorel Juvenile Group (DJG) is submitting this 573.6 Noncompliance Information Report for two models of Infant child restraints which were specific to the “institutional” market. Those two models were sold without the base, which contains the required LATCH attachment assembly. For this reason, the restraints in question are noncompliant to 571.213 Child Restraint Standard.

1. *Manufacturer's name/address*

Dorel Juvenile Group
2525 State Street
Columbus, IN 47201

2. *Equipment included in this noncompliance notification*

There are two model numbers involved with this Noncompliance Information Report.

IC124FSM OnBoard 35 Infant child restraint

IC123FSM Comfy Carry Infant child restraint

These units were produced from May of 2011 until this issue was discovered. All units with these model numbers are included.



3. *Total number of units*

IC123FSM Comfy Carry – 1,734 Units

IC124FSM OnBoard 35 – 3 Units

4. *Approximate percentage of equipment estimated to actually contain the noncompliance.*

All of the 1,737 units produced did not contain the LATCH as required by FMVSS 213 and are therefore noncompliant.

5. *Description of the noncompliance*

The infant child restraints that are subject of this report were distributed without the separate base that contains the required LATCH attachment assembly. These units are therefore noncompliant to FMVSS 213. Although the LATCH attachment assembly on these units is located on the base, and these particular models were distributed without the base, the subject child restraints can be safely and effectively installed in a motor vehicle utilizing the vehicle belt system.

6. *Chronological summary of events leading to this determination.*

Production of these models began in May 2011. The units were not sold in the normal retailer venue but rather these units were made available to “institutional” customers. Institutional customers include various Safe Kids programs, hospitals, and organizations which typically assist low income families by making child restraints available at a low cost or even no cost. The reason these units were distributed without a base was an attempt to keep the cost down at the request of the institutional customers, so that more affordable child restraints could be made available to a greater number of children with the need for reliable child restraint systems. In late April 2012, DJG was notified by a certified Child Passenger Safety Technician of a concern that the seat being checked did not have LATCH. Upon investigation, DJG was able to confirm there were two models which did not contain the required LATCH attachment hardware. DJG advised the National Highway Traffic Safety Administration informally by telephone and is following up with this noncompliance information report.



7. *Description of proposed remedy*

Bases which include LATCH systems will be provided at no cost to all those who verify they have the affected units.

8. *Program for remedy*

DJG will contact registered owners, distributors, and utilize other methods such as our websites and Child Passenger Safety social media to notify persons regarding the remedial activity. This will take place as soon as possible, no later than 30 days after the announcement.

DJG is proceeding with the remedial action with regard to this noncompliance. There have been no reported issues regarding installation of these units. There have been no claims, injuries, or deaths reported associated with this noncompliance.

DJG appreciates the opportunity to cooperate with the National Highway Traffic Safety Administration related to this activity.

Please contact me directly if there are any questions or concerns.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Terry Emerson", written over a horizontal line.

Terry Emerson
Director of Quality Assurance
Dorel Juvenile Group
812-314-4432

Cc: Jeff Giuseppe – NHTSA
Mark Evanko - DJG