

**LITTLETON JOYCE
UGHETTA PARK & KELLY LLP**

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December 19, 2012

VIA EMAIL

National Highway Traffic Safety Administration
Office of Vehicle Safety Compliance (NVS-222)
Room W43-499
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Attn: Mr. Jeffrey Giuseppe, Chief
Equipment Division

Re: Vega XTS Motorcycle Helmet
NVS-222CCo
OA-218-120105

Dear Mr. Giuseppe:

In accordance with 49 CFR Part 573, Vega Helmet Corporation (“Vega”), which I represent as counsel, is submitting this information report involving all Vega XTS model motorcycle helmets, sizes Large, Extra Large, and Extra Extra Large (hereinafter referred to as “L”, “XL,” and “XXL”) manufactured from May 2011 to October 2012, which may not comply with the impact attenuation requirements of Federal Motor Vehicle Safety Standard (“FMVSS”) 218.

Description of Noncompliance

Some Vega XTS model motorcycle helmets, sizes L, XL, and XXL manufactured from May 2011 to October 2012 may not comply with the impact attenuation requirements of Federal Motor Vehicle Safety Standard (“FMVSS”) 218.

Identification of Helmets Involved in Recall

Some Vega XTS model motorcycle helmets, sizes L, XL, and XXL manufactured from May 2011 to October 2012.

Recall Population

The number of helmets involved in this recall is 30,546.

Percentage of Helmets Estimated to Contain Noncompliance

Unknown, so Vega will, in an abundance of caution, voluntarily recall all L, XL, and XXL Vega XTS model motorcycle helmets manufactured from May 2011 to October 2012, even those helmets that are in compliance with FMVSS 218.

Chronology of Events

By letter dated September 25, 2012, NHTSA advised Vega Helmet Corporation that on January 5, 2012, Southwest Research Institute tested four XL Vega XTS model motorcycle helmets as part of NHTSA'S Motorcycle Helmet Compliance Program. NHTSA further advised that Southwest Research Institute determined that the four helmets it tested were noncompliant with S5.1 of FMVSS 218. After investigation, Vega identified the cause of the noncompliance as changes to the EPS and shell configuration that occurred in May 2011. Vega subsequently provided a timely response to NHTSA's September 25, 2012 letter, which requested certain information regarding the XTS model helmet and advised NHTSA that the design of L, XL, and XXL XTS helmets would be reconfigured to immediately rectify any noncompliance. Because Vega cannot be sure which L, XL, and XXL Vega XTS model motorcycle helmets manufactured from May 2011 to October 2012 comply with S5.1 of FMVSS 218, it has decided to voluntarily recall all of those helmets.

Remedy

Vega will provide owners of the recalled helmets, including dealers that have affected helmets in inventory, with either: 1) a replacement XTS model helmet which complies with FMVSS 218; or 2) other model helmet of equal or lesser value.

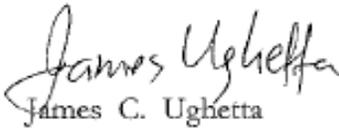
Proposed Manner of Notification

Vega has contact information for dealers that purchased the affected helmets, but does not have any means of obtaining the identity or addresses of helmet owners and users affected by this recall. For this reason, Vega proposes to provide public notice, as contemplated by 49 CFR §577.7(a)(2)(ii)(B). Drafts of Vega's proposed letter to dealers and public notice will be prepared and submitted to NHTSA for its review soon. Further, Vega will be prepared to proceed with the owner notification of this recall by means of the referenced public notice within (30) days of NHTSA's approval of the notice documents and issuance of a recall identification number.

Please advise the undersigned, James C. Ughetta, Esq. of Littleton Joyce Ughetta Park & Kelly LLP, The Centre at Purchase, 4 Manhattanville Road, Suite 202, Purchase, NY 10577, by letter or email (james.ughetta@littletonjoyce.com) of the NHTSA recall number assigned to this campaign, and if NHTSA has any questions concerning this matter.

Very truly yours,

LITTLETON JOYCE UGHETTA PARK & KELLY LLP


James C. Ughetta

cc: Ms. Jeanne DeMund
Vega Helmet Corporation

Andrew Magaletti
National Highway Traffic Safety Administration