

**LITTLETON JOYCE  
UGHETTA PARK & KELLY LLP**

NEW YORK CITY | PURCHASE, NY | RED BANK, NJ | LOS ANGELES | PHILADELPHIA

May 13, 2013

**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: Harley-Davidson Hybrid C/C Half Motorcycle Helmet (Size Large)**  
**NVS-222CCo**  
**OA-218-110907**

Dear Mr. Giuseppe:

In accordance with 49 CFR Part 573, KBCA America, Inc. ("KBCA"), which I represent as counsel, is submitting this information report involving Harley-Davidson Hybrid C/C Half Motorcycle Helmets, Size Large, manufactured in March 2011, which may not comply with the impact attenuation and penetration requirements of Federal Motor Vehicle Safety Standard ("FMVSS") 218.

**Description of Noncompliance**

Harley-Davidson Hybrid C/C Half Motorcycle Helmets, Size Large, manufactured in May 2011 may not comply with the impact attenuation and penetration requirements of Federal Motor Vehicle Safety Standard ("FMVSS") 218. KBCA is currently investigating any potential non-compliance and will supplement this report accordingly.

**Identification of Helmets Involved in Recall**

KBCA is currently investigating and will supplement this report accordingly.

**Recall Population**

KBCA is currently investigating and will supplement this report accordingly.

### **Percentage of Helmets Estimated to Contain Noncompliance**

KBCA is currently investigating and will supplement this report accordingly.

### **Chronology of Events**

By letter dated February 28, 2012, NHTSA advised KBC America, Inc. that on September 7, 2011, Act Lab LLC tested four Harley-Davidson Hybrid C/C Half Motorcycle Helmets, Size Large, as part of NHTSA'S Motorcycle Helmet Compliance Program. NHTSA further advised that Act Lab LLC determined that one helmet ("Helmet A") was non-compliant with S5.2 of FMVSS 218, one helmet ("Helmet B") was non-compliance with S5.1 of FMVSS 218, and one helmet ("Helmet C") was non-compliant with S5.1 and S5.2 of FMVSS 218. KBCA is currently investigating the existence and extent of the non-compliance reported by Act Lab LLC and will supplement this report accordingly.

### **Remedy**

KBCA is currently investigating and will supplement this report accordingly.

### **Proposed Manner of Notification**

KBCA is currently investigating and will supplement this report accordingly.

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: Peter Yoon  
KBC America, Inc.

Vince Sohn  
KBC America, Inc.

Andrew Magaletti  
National Highway Traffic Safety Administration