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May 22, 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: Ms. Kelly Schuler
Recall Management Division - Office of Defects Investigation

**Re: Harley-Davidson Hybrid Classic Cruiser Half Helmets
Sizes L, XL, and XXL, Manufactured in March 2011
NHTSA Campaign No.: 13E-025**

Dear Ms. Schuler:

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

Identification of Helmets Involved in Recall

All L, XL, and XXL size Harley-Davidson Hybrid Classic Cruiser Half Helmets manufactured in March 2011. These helmets were manufactured in Production Lot 10-455 and this recall pertains to all L, XL, and XXL size helmets from that production lot.

Recall Population

This recall pertains to 456 helmets manufactured in March 2011.

Percentage of Helmets Estimated to Contain Noncompliance

Unknown. In an abundance of caution, all L, XL, and XXL size Harley-Davidson Hybrid Classic Cruiser Half Helmets manufactured in March 2011 will be recalled.

Chronology of Events

By letter dated February 28, 2012, NHTSA advised KBCA that on September 7, 2011, Act Lab LLC tested four Harley-Davidson Hybrid Classic Cruiser Half 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 determined that the helmets that Act Lab LLC tested were part of Production Lot 10-455, which was manufactured in March 2011. Production Lot 10-455 contained a total of 456 L, XL, and XXL size helmets. Because KBCA is unable to determine whether the L, XL, and XXL size helmets from Production Lot 10-455 comply with FMVSS 218, it has decided, in an abundance of caution, that all L, XL, and XXL size Harley-Davidson Classic Cruiser Half Helmets from Production Lot 10-455 will be recalled.

Remedy

KBCA is in the process of determining what remedy will be provided to owners of the affected helmets and will supplement this report accordingly.

Proposed Manner of Notification

KBCA does not have a record of, or any means of obtaining the identity/addresses of helmet owners and users affected by this recall. For this reason, KBCA proposes that owners of the affected helmets be advised of this recall by public notice, as contemplated by 49 CFR §577.7(a)(2)(ii)(B). A draft of this notice will be prepared and submitted to NHTSA for its review within one week after completion of this Part 573 report. Further, KBCA will be prepared to proceed with the owner notification pursuant to this recall by means of the referenced public notice within thirty (30) days of NHTSA's approval of the draft notice document.

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) 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