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October 18, 2013

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
Orbit Baby, Inc. Car Seat Base G2 (Model No. ORB822000)**

Dear Administrator:

Orbit Baby, Inc. (“Orbit Baby” or the “Company”) has received consumer complaints that the StrongArm Knob component of the Orbit Baby Car Seat Base G2 (Model No. ORB822000) (the “G2 Car Seat Base”) detaches or spins without tightening the base, which makes the affected G2 Car Seat Base unable to be installed in accordance with the instruction manual. The recently reported Car Seat Bases were manufactured beginning on March 20, 2013 through July 20, 2013 with one of the following Batch Numbers: A0840, A0860 and A0880. As of October 15, 2013, Orbit Baby has received in the aggregate approximately 34 complaints regarding this issue with the affected units but has not received any report of injury related to this issue. As the Car Seat Base cannot be installed in accordance with the instruction manual when this occurs, Orbit Baby has decided to initiate a voluntary recall campaign to remedy this issue with the affected bases (the “G2 Car Seat Base Campaign”).

At this time, Orbit Baby has not made a determination that this issue is a defect that relates to motor vehicle safety. This issue makes the G2 Car Seat Base unable to be installed in accordance with the instruction manual but does not otherwise affect the performance of the Infant Car Seat G2 carrier (Model No. ORB833000) when used (i) without the Car Seat Base or (ii) with the Car Seat Base that is securely installed in accordance with the instruction manual. If the child restraint system is securely installed in accordance with the instruction manual, its ability to protect the occupant in the event of a motor vehicle crash is unaffected regardless of the presence or condition of the StrongArm Knob.

Nonetheless, out of an abundance of caution, Orbit Baby has decided to initiate a voluntary recall to address this issue and in accordance with the requirements of 49 CFR §573,

Orbit Baby submits this report having determined that Orbit Baby G2 Car Seat Bases (Model No. ORB822000) manufactured beginning on March 20, 2013 through July 20, 2013 with one of the Batch Numbers A0840, A0860 and A0880 contain a manufacturing defect.

In accordance with 49 CFR § 573.6, Orbit Baby provides the following information to the National Highway Traffic Safety Administration (“NHTSA”).

1. Manufacturer’s name/address:

Orbit Baby, Inc.
8445 Central Avenue,
Newark, CA 94560

2. Equipment included in this defect notification:

Select G2 Car Seat Bases (Model No. ORB822000) manufactured from **March 20, 2013 through July 20, 2013** with one of the following Batch Numbers:

Batch No.
A0840
A0860
A0880

NOTE: Infant Car Seat G2 carrier (Model No. ORB833000) is NOT included in this recall. Only the bases are included.

3. Total number of units:

Orbit Baby manufactured 5,330 G2 Car Seat Bases which are included in the G2 Car Seat Base Campaign with approximately 2,962 of such G2 Car Seat Bases sold to date. Approximately 2,368 of such G2 Car Seat Bases remain in Orbit Baby inventory.

Orbit Baby is working now to determine the number of G2 Car Seat Bases that are still in the retailer inventory and the number that are in the hands of consumers.

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

The Company is investigating, but as of the date of this letter, Orbit Baby cannot determine the exact percentage of the 5,330 G2 Car Seat Bases with the manufacturing defect. Approximately 2,368 of such G2 Car Seat Bases remain in Orbit Baby inventory.

5. Description of the defect:

The G2 Car Seat Bases (Model No. ORB822000) covered by this recall campaign include only those units that were manufactured in three (3) batches identified as Batch Numbers A0840, A0860 and A0880, all of which were manufactured between March 20, 2013

through July 20, 2013.

The G2 Car Seat Base has a patented StrongArm mechanism that tensions the LATCH belt, vehicle lap-shoulder belt or vehicle lap belt that is looped through the belt guides on the G2 Car Seat Base to secure the base into the vehicle. A consumer loops the applicable belt through the belt guides and is instructed to turn the StrongArm Knob in front of the car seat base to tension the belt for a secure installation. The StrongArm mechanism amplifies the strength of the consumer and tightens the car seat base into the vehicle. The consumer is then instructed to check for a secure/tight installation by tugging on the belt guides and checking that the upright portion of the car seat base does not move more than 2.5 cm (1 in) in any direction. When the StrongArm Knob detaches or spins without tightening the base, the G2 Car Seat Base cannot be properly secured into the vehicle in accordance with instruction manual.

A copy of the instructions can be found at:

www.orbitbaby.com/static/main/app_data/manuals/Orbit_Baby_830_InfantCarSeatBase_G2Manual_web_.pdf

The StrongArm Knob is connected by a pin to a rod that engages the StrongArm mechanism. In the affected G2 Car Seat Bases, the pin may loosen and fall out, in which case the StrongArm Knob either detaches or just spins without tightening the base. In either of these cases, the G2 Car Seat Base cannot be installed securely in accordance with the instruction manual because instruction manual advises the consumer to tighten the belt by using the StrongArm mechanism.

If the G2 Car Seat Base is securely installed in accordance with the instruction manual and the StrongArm Knob later detaches or just spins, the base will remain securely installed and can continue to be used with the car seat. This issue does NOT affect the performance of a securely installed G2 Car Seat Base in a crash.

This issue does NOT affect the Orbit Baby Infant Car Seat G2 carrier (Model No. ORB833000), which can be installed with or without the Car Seat Base. The Infant Car Seat G2 carrier can continue to be used without the base until a repair kit has been installed.

Please see attached Exhibit A for pictures relating to the StrongArm Knob.

6. Chronological summary of events:

The three (3) affected manufacturing batches of the G2 Car Seat Bases were manufactured between March 20, 2013 and July 20, 2013. With respect to these batches, a new material for the StrongArm Knob was implemented which changed the fit of the connecting pin used to secure the StrongArm Knob.

With respect to these batches, on July 16, 2013, Orbit Baby received the first complaint that a consumer was unable to install the car seat base because the StrongArm Knob had

detached and the consumer requested a replacement component. As of October 15, 2013, Orbit Baby has received in the aggregate approximately 34 complaints regarding this issue with the affected units.

No additional batches of the G2 Car Seat Bases with the manufacturing defect have been produced since the date of the last batch. Orbit Baby is implementing a production change for all future production which will have different date of manufacture and batch numbers.

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

Orbit Baby will submit draft copies of the Retailer and Consumer Notices pursuant to FMVSS 577.

On October 15, 2013 Orbit Baby began informally notifying retailers advising them to check their inventory and stop sale of all products from the affected manufacturing dates and batches. An official Retailer Notice will be distributed after it has been reviewed by NHTSA.

Orbit Baby will make available repair kits to registered consumers and to retailers with inventory of affected units. Orbit Baby will make such repair kits available shortly after the remedy program is reviewed by NHTSA.

For those bases affected by the recall, Orbit Baby will make available a repair kit consisting of a barrel nut, screw, allen wrench and repair instructions to registered consumers and to retailers with inventory of affected units. With the use of the included allen wrench, a person can easily and securely re-attach the StrongArm Knob into the rod that engages the StrongArm mechanism for those units where the knob detaches or has detached.

Until the StrongArm Knob has been secured to the rod that engages the StrongArm mechanism using the repair kit, consumers can continue to use the Infant Car Seat G2 carrier with the base provided that the base is securely installed in accordance with the instruction manual or they can use the Orbit Baby Infant Car Seat G2 carrier without the G2 Car Seat Base.

8. Program for remedy campaign:

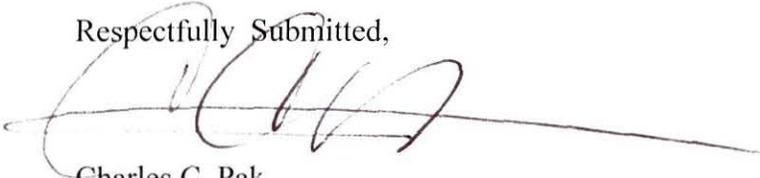
Orbit Baby will issue a press release announcing the voluntary recall. The press release will advise consumers with affected units to contact Orbit Baby Customer Service (1-877-672-2229) for more information.

Orbit Baby will directly mail the repair kit to all registered US consumers of the affected units. Currently, there are approximately 391 registered US consumers. Information and instructions related to the campaign including an instructional video will be posted on the

Orbit Baby web site. Please see attached Exhibit B for a draft copy of the repair kit instructions. It is not necessary to reimburse consumers as all repair kits will be provided at no cost.

Orbit Baby will mail Retailer Notices to retailers selling the affected units after such Notice has been reviewed by NHTSA.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'C. Pak', with a long horizontal line extending to the right.

Charles C. Pak
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888 S. Figueroa St., Suite 2050
Los Angeles, California 90017
Direct Phone: (213) 607-1932
Email: cpak@ergobaby.com

cc: Margaret Hardin
Michael Sanders

EXHIBIT A – STRONGARM KNOB



EXHIBIT B – REPAIR KIT INSTRUCTIONS

StrongArm™ Knob Repair Kit Instructions

For Car Seat Base G2 (Model No. ORB822000)
 Customer Service: 1-877-ORB-BABY (672-2229) | support@orbitbaby.com

Your Repair Kit provides the parts to re-attach the StrongArm knob onto your Car Seat Base G2. Before opening your Repair Kit, take the following steps:

- First, inspect your base to determine if the pin securing the StrongArm knob is missing, allowing the StrongArm knob to detach or just spin without tightening the base.
- If the StrongArm knob has detached or detaches when pulled, proceed to re-attach the StrongArm knob by following the instructions below.
- If the StrongArm knob is secure and tightens the base when turned, store the Repair Kit and install it should the StrongArm knob later detach or spin without tightening the base.



Your Repair Kit comes with a barrel nut (A), a screw (B), and an allen wrench (C).

The repair should take approximately 3 to 5 minutes.

Pull on the StrongArm knob to see if it detaches from the rod portion of the base. If the knob has detached or pulls off, continue onto step 3. If not, keep the Repair Kit in the event the StrongArm knob later detaches or spins without tightening the base.

Slide the StrongArm knob onto the rod portion of the base so that the hole in the StrongArm knob is aligned with the hole in the rod.

Insert the barrel nut into the hole. Press the barrel nut firmly down.

Keep your finger on the barrel nut and turn the StrongArm knob so the other side is now facing upwards.



Insert the screw and turn clockwise a few times to engage the threads.

While keeping your finger underneath holding the barrel nut, take the allen wrench and tighten the screw.

Tighten the screw using the short end of the allen wrench to ensure the screw is fully secure.

Pull on the StrongArm knob to make sure it is secure. It should not come off.

Repair is now complete. Please discard plastic bag and allen wrench.