

14C-001
5 pages - Amended

March 7, 2014

VIA E-MAIL (RMD.ODI@DOT.GOV)

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Amended Part 573 Report

Dear Ms. Lewis:

Graco Children's Products, Inc. ("Graco") submits this amended report pursuant to 49 C.F.R. Part 573. This report supplements Graco's prior reports submitted on February 7 and 10, 2014. Graco has decided to conduct a safety recall with regard to certain toddler and harnessed booster car seats. The report identifies the car seat models incorporating the buckles at issue and the dates of their manufacture.

The overall number of subject car seats includes an additional 403,222 units primarily due to the inclusion of units manufactured prior to 2009. In addition, Graco has more specifically identified the car seats through grouping them by model family and including some new model names. For example, the prior Part 573 report listed the "Nautilus," whereas this report specifically breaks out by unique name the three car seats in the Nautilus family: the Nautilus 3-in-1, the Nautilus Plus, and the Nautilus Elite.

Graco's records captured all car seats with the subject buckles in its production volume database by using a higher-level description of the type of car seat than the specific model name, which is why some additional model names have been added. All of these model names appear on Graco's website posting and are shown on order forms used by consumers to order their replacement buckle kits. Graco can also confirm that all model names (and derivatives noted in the report) have already received significant orders from consumers.

Graco will submit any additional necessary information as it becomes available.

Thank you,



Sean Beckstrom
Vice President, Legal Affairs
Newell Rubbermaid – Baby & Parenting Essentials

49 C.F.R. § 573.6(c)(1): Manufacturer’s name

Graco Children’s Products, Inc. is the manufacturer of the subject car seats.

The subject buckles were fabricated by AmSafe Commercial Products, Inc., 22937 Gallatin Way, Elkhart, IN 46514.

49 C.F.R. § 573.6(c)(2): Items of equipment

A list of the affected models, and the dates of their manufacture, is set forth below:

MODEL NAME	AFFECTED DATES
Argos 70 Argos 70 Elite	5/1/2011 through 7/31/2013
Classic Ride 50	10/1/2011 through 9/30/2013
Comfort Sport Ready Ride	10/1/2010 through 9/30/2013
Cozy Cline Step 2	1/1/2006 through 4/30/2010
My Ride 65 My Ride 65 with Safety Surround	4/1/2009 through 7/31/2013; and 9/30/2013*
My Ride 70	5/1/2012 through 7/31/2013
My Size 70 Size 4 me 70 Head Wise 70 with Safety Surround	1/1/2012 through 7/31/2013; and 8/3/2013*
Nautilus 3-in-1 Nautilus Plus Nautilus Elite	10/1/2007 through 7/31/2013; and 8/19/2013*
Smart Seat Smart Seat with Safety Surround	12/1/2010 through 9/30/2013; and 10/9/2013, 12/25/2013, 1/10/2014*

* Some car seats manufactured after the end date of the production run were produced with the subject buckles.

The scope of the recall is consistent with the NHTSA PE12-031 and EA13-001 evaluations time period of the subject car seats with the “Signature” buckle and the start of production of subject car seats with the QT or QT3 buckle. The end date represents the end date of production of the

subject car seats with the Signature, QT or QT3 buckle, and the start of production with a different buckle.

49 C.F.R. § 573.6(c)(3): Total Number

The total number of subject car seats is 4,176,601. Additional car seats that are the subject of the open investigation are not included in this report because Graco believes that those car seats are subject to substantially different use conditions and time in service, and because in an emergency situation an adult is far more likely to remove the entire car seat from the vehicle rather than unlatch the car seat's buckle and remove the infant from the car seat. Graco looks forward to further discussions with the Agency to resolve any remaining issues relating to those additional car seats.

49 C.F.R. § 573.6(c)(4): Percentage of Affected Equipment

All of the subject car seats could potentially experience the issues leading to this recall. To date, approximately 0.15% of the subject car seats have been reported to have experienced difficulty unlatching the subject buckles.

49 C.F.R. § 573.6(c)(5): Description

Graco and NHTSA have received numerous complaints about buckles in the subject car seats being difficult or unable to unlatch. This condition may make it difficult to remove the child from the car seat, increasing the risk of injury in the event of an emergency situation where prompt exit from the vehicle is required.

49 C.F.R. § 573.6(c)(6): Chronology

In 2005, Graco introduced into production a new car seat buckle designed collaboratively with AmSafe, which was equipped with the "Signature" feature. This buckle was gradually implemented on several models of infant car seats over time. In 2006, this buckle was utilized on one model of forward-facing toddler car seat and then in 2007 was redesigned and used on the launch of a new harnessed booster car seat. The redesigned buckle retained the Signature feature, and this new buckle was utilized on several new car seat platforms. In the summer of 2010, Graco introduced into production a new, off-the-shelf buckle, also produced by AmSafe, the QT buckle.

Both buckle designs are 5-point buckles with 2 tongues and a central release button. The Signature buckle is a sliding button and must be depressed downward toward the crotch webbing in order to release the tongues. The QT buckle release button is hinged button and must be depressed inward at the top portion of the red button in order to release the tongues

While the designs reduced the potential for older children to unlatch the buckles themselves, Graco received numerous complaints that the new buckles were becoming difficult

to unlatch and at times became stuck in the latched position. Graco determined that when the buckles on the subject car seats become contaminated with foreign material such as food or dried liquids, over time they may become more difficult to unlatch or become stuck in the latched position. Graco took steps to address the consumer dissatisfaction with the new buckles. Graco twice issued additional and enhanced communication with regard to cleaning the buckle mechanism, first in June 2012 and again in February 2013. Graco's experience is that most owners who followed Graco's cleaning recommendation no longer experienced difficulty in unlatching the Signature, QT and QT3 buckles, which is consistent with the field returns Graco examined. Graco also removed any limitation on the warranty so that consumers could become comfortable with the new buckles without concern over timing. Graco incorporated design improvements into the QT buckle in November, 2012. In addition, Graco initiated a design study in August 2012, to review potential design improvements, and incorporated a newly designed buckle into production on convertible and harnessed booster seats starting in July 2013 and available to consumers as a replacement buckle as of June 2013.

On October 2012, NHTSA opened an investigation into the Signature and QT buckles used on car seats manufactured in 2009 and forward. NHTSA upgraded the investigation in February 2013, and in January 2014, requested that Graco conduct a safety recall in lieu of its efforts to address consumer experience on a case by case basis. After further discussions with NHTSA, Graco decided to conduct a safety recall to replace the Signature, QT and QT3 buckles on convertible and harnessed booster car seats, and provided its initial Part 573 letter on February 7, 2014. Based on its discussion with NHTSA, Graco determined that a safety recall is warranted with regard to toddler and harnessed booster car seats due to the risk that, given the physical orientation and use conditions of those seats, there is an enhanced potential for foreign material to interfere with the buckle mechanism over time.

49 C.F.R. § 573.6(c)(8): Manufacturer's Program for Remedy

Graco will conduct a safety recall to replace the buckles on the Subject Car Seats. Graco has established a website presence devoted to the recall and a 1-800 toll free number to receive consumer calls. At the request of retailers, Graco has provided information to retailers notifying them of the affected products (platform, fashion and manufacturing dates) that had been sold in their stores. This notification was sent on February 12, 2014 along with a poster to be placed in a retail location to give additional information to consumers.

Graco will provide 577 letters for NHTSA's approval to be sent to all consumers that have completed registration cards. The timing of the mailing of the 577 letters will be shared with NHTSA once NHTSA has approved the text. The Part 577 letters will conform in all respects to NHTSA's regulations.