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By Recall Management Division at 8:08 am, Jul 18, 2014

**Safety Defect and Noncompliance Report for Motor Vehicle Equipment  
PART 573 Defect and Noncompliance Report [49 CFR Part 573]**

**Date of Submission:** July 17, 2014

**Submitted to:** Defects and Recall Information Analysis Division via [RMD.ODI@dot.gov](mailto:RMD.ODI@dot.gov) and fax (202) 366-7882

This report serves as Helmet City Inc's (hereinafter HCI) notification to the U.S. Department of Transportation, National Highway Traffic Safety Administration that a "noncompliance with FMVSS" exists in certain Model 100 motorcycle helmets. Reporting party determined that a "noncompliance" existed in this equipment on or about May 25, 2014.

**I. Manufacturer, Designated Agent, and Other Chain of Distribution Information**

Manufacturer's corporate name:

Beijing Shenzhou Rodia Industry & Trade Co., Ltd. (BSR)

Equipment's brand or trademark name owner(s) (where applicable):

Helmet City Inc. (HCI)  
1405 Poinsettia Dr.  
Suite #7  
Delray Beach FL. 33444

Designated Agent (imported equipment):

Per 49 CFR 551: Sunright International of America, Inc. 1715 Lakes Parkway, Lawrenceville GA 30043

If this notification concerns equipment that was installed in new motor vehicles or new items of motor vehicle equipment, identify by name, address, and telephone number each vehicle manufacturer and equipment manufacturer who purchased that equipment:

N/A

If this notification concerns a defective or noncompliant component that the above identified manufacturer did not manufacture, identify that component and provide the name, address, and phone number of the manufacturer of the component (if this manufacturer is unknown, provide this information as to the supplier of the component):

N/A

Name, address, email, and phone and fax numbers for the person(s) to whom inquiries about this report should be directed:

Steven W. Hansen  
 LAW OFFICES OF STEVEN W. HANSEN  
 5913 Lorelei Avenue  
 Lakewood, CA 90712-1347  
 Phone 562.866.6228 (9am to 5pm PST)  
 steven.w.hansen@swhlaw.com

Manufacturer’s assigned campaign number (where applicable):

N/A

**II. Identification of the Recall Population and Its Size**

Complete the tables below for each item of equipment subject to this notification. Additional tables may be necessary where there are more than three items subject to a notification.

Type of equipment (e.g., tire, child restraint, headlamp): Motorcycle Helmet (on highway use)
Part/Model number: HCI model 100
Size and function (where applicable): Sizes L XL XXL size outer shell for on road use
Inclusive dates of manufacture (month and year): August 2012; Helmets at issue will have a black and white label (dimensions 2” x 1”) inside on EPS foam with Month & Year, in this case “ / 8 /2012” (see photo example below) followed by the words “Made in HCI China” “Inspector A B C”

Other information necessary to describe this equipment: (see photo below; this is to demonstrate style only; colors and patters on recalled helmet population vary)


Total number of these items of equipment: 1755

Provide the following information as to all the items of equipment (“the recall population”) identified above

Sizes L XL XXL outer shell manufactured in August 2012 Helmets at issue will have a black and white label (dimensions 2” x 1”) inside on EPS foam with Month & Year, in this case “/ 8 /2012” followed by the words “Made in HCI China” “Inspector A B C”

Grand total number of items of equipment in the recall population:

1755

The percentage of the recall population you estimate actually contain the defect or noncompliance:

20%

Identify and describe how the recall population was determined (e.g., on what basis the recalled models were selected and how the inclusive dates of manufacture were determined):

As the NHTSA letter dated May 19 2014 to HCI only identified a potential problem in sizes (L, XL and XXL) in the HCI model 100 of the helmets produced in August 2012, we are limiting the population to all those helmets.

Describe how the recall population is different from any similar items of equipment not subject to this notification:

The recall population is easily identified by model HCI 100 and by the August 2012 manufacturing date in each recalled helmet. Only the recalled HCI model 100 helmets have the August 2012 manufacturing date in them.

### **III. Description of the Defect or Noncompliance and Chronology of Events**

Describe the defect or noncompliance, including a summary and detailed description of the nature and physical location (if appropriate) of the defect or noncompliance. Graphic aids should be provided where necessary.

See NHTSA letter dated May 19 2014 to HCI for details (peak accelerations shall not exceed 400G)

Describe the cause(s) of the defect or noncompliance condition.

HCI can only speculate and in so doing believes that BSR may have used the wrong size EPS shell during production of the helmets.

Describe the consequence(s) of the defect or noncompliance condition.

This is unknown and speculative.

For defects, provide a dated, chronological summary of all the principle events that were the basis for the determination that the defect is related to motor vehicle safety, including a summary of all warranty claims, field or service reports, and other information such as numbers of crashes, injuries and fatalities.

N/A

For noncompliances, identify the test results and other information considered in determining the existence of the noncompliance, and provide the date of each test and observation indicative of that noncompliance.

See NHTSA letter dated May 19 2014 to HCI for details.

#### **IV. The Remedy Program and Its Schedule**

Describe the program for remedying the defect or noncompliance, including the plan for reimbursing those owners and purchasers who may have incurred costs to remedy the defect or noncompliance before receiving the manufacturer's notification concerning that defect or noncompliance. Also include, where applicable, details with dates concerning any production remedy that was conducted or will be conducted.

HCI will put a notice in American Motorcycle Dealer (<http://www.dealer-world.com>) trade magazine as well as see that the information is sent out to industry websites that cover such issues. The notices will provide specific information about the recall and how to contact HCI and obtain a replacement helmet.

Provide the estimated date(s) on which owner and purchaser notifications will be issued and the estimated date(s) for completion of those notifications.

Oct. 1, 2014 notification date; the completion date depends on what percentage of the distributors provided us with retailer and or consumer contact information.

Provide the estimated date(s) on which dealer and distributor notifications will be issued and the estimated date(s) for completion of those notifications.

Oct. 1, 2014 notification date; the completion date depends on what percentage of the distributors provided us with retailer and or consumer contact information.

Describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

The replacement helmets were manufactured in the year 2014 and the labels inside the replacement helmets will indicate the 2014 production date vs. the recalled helmets which will have the August 2012 production date on their labels.

END OF REPORT