

Chronology of Defect

In March of 2015 Britax received a complaint that a handle on a B-Safe 35 infant carrier was damaged. The returned product was inspected and the cause of the fracture could not be determined other than the potential for impact damage.

During developmental testing prior to launch of production in October 2014, the B-Safe 35/Elite's carrier's handles were tested by several means including a static load test with a target of 200 lbs., an internal durability/bounce test, a packaging drop test and an ASTM F2050-13a handle integrity test. Additionally the B-Safe 35/Elites were tested dynamically on the sled bench pursuant to FMVSS 213. These developmental tests confirmed the efficacy of the design and manufacture of the pre-production handles to withstand anticipated forces during shipment and load capacity when carried with an infant as well as dynamic performance during motor vehicle crash.

After the initial handle complaint was received, Britax also tested product in inventory and reviewed the Bill of Materials (BOM) and design specifications with the handle manufacturer. Britax was unable to duplicate the damage on other exemplar products with a weight loaded carrier in normal use conditions.

Additional complaints were received over the next several months and Britax attempted to recover subject infant carriers as complaints were received but inspection of these returns failed to reveal the cause of the handle cracking other than the potential for impact damage. These returned products had carrier handle cracks and fractures generally on the top of the carrier handle at the juncture of the grip and the body of the handle. Although Britax was able to discover some variance in the wall thickness of the molded handles, these variations did not seem to account for the handle failures. The only method which consistently replicated the handle fractures was an extreme cold temperature drop test developed during this investigation but which did not represent real world usage conditions.

In April of 2015, Britax received report # 150403CCC1430 from the Consumer Product Safety Commission that the agency had received and investigated a report that a B-Safe 35 infant

carrier handle had fractured although there was not any reported injury to the infant involved. Based upon the consumer photographs included in the report, the location of the handle fracture appeared consistent with other complaints known at the time.

In May of 2015 Britax received the only complaint to date that an infant was injured when a B-Safe 35 handle broke and the infant carrier dropped to the ground. The infant suffered a bruise and bump to the head. The involved infant carrier was never returned to Britax to confirm the ID of the product nor the condition of the carrier handle as it was replaced through a retailer and not preserved.

Beginning on June 1st, 2015 there were several changes made to the B-Safe carriers consistent with the standard product development protocol which requires analysis and improvement after product launch based upon market feedback. Several changes were made to the cover fashions and metal components of the B-Safe 35/Elite carriers. The handle was also revised to improve the ergonomics and for molding efficiencies, the Britax logo on the top of the handle was rotated to the front. These revisions also resulted in increased material control and manufacturing efficiencies, and enhanced the durability of the handle. Britax also required that the handle manufacturer initiate additional stringent quality control measures to better monitor and measure production.

Britax has not received any complaints of B-Safe 35/Elite handle cracking or breaking for products made after these revisions in June 2015. Britax has also thoroughly tested this later version of the products including utilizing the frozen drop test and all of these infant carriers have passed those test standards. Products made after July 1st, 2015 are not included in this proposed campaign.

Despite the difficulty in either recreating the handle damage to in-stock inventory or identifying a defect in the handle, based upon the product performance and the number of consumer complaints, Britax has determined to recall and remedy the handles of B-Safe 35\Elite infant carriers made prior to July 1, 2015. To date, Britax has received 74 consumer complaints from that product population with a carrier handle either cracked or broken. Britax has received

no consumer complaints to date for infant carriers made after July 1, 2015 that indicate a cracked or broken handle.