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12C-004
(5 pages)

November 2, 2012

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 Britax Child Safety, Inc. Boulevard, Advocate and Pavilion Car Seats

Dear Sir or Madam:

For the past several months Britax Child Safety Inc. ("Britax") has received consumer complaints that children have bit into the HUGS pad which is a component of the child seat harness system on certain Britax convertible car seats. The three convertible child seats involved include select Boulevard 70-G3, Advocate 70-G3, and Pavilion 70-G3 series seats that began production on June 11, 2012. Those products were manufactured with an enhanced harness system that incorporated a softer more pliable, non-toxic material intended to provide increased performance and comfort. Britax has received three reports that children have bitten off and gagged on pieces of the pads. For this reasons, Britax has decided to initiate a voluntary recall campaign. Pursuant to the requirements of 49 CFR § 573 Britax submits this report having determined that the select Boulevard 70-G3, Advocate 70-G3, and Pavilion 70-G3 series convertible child seats manufactured beginning on June 11, 2012 through August 31, 2012 contain a defect which could result in injury.

Britax also is concurrently notifying Transport Canada as these same products were sold in Canada.

In compliance with 49 CFR 573.6 Britax provides the following information.

1. Manufacturer's name/address:

Britax Child Safety, Inc.
13501 South Ridge Drive
Charlotte, NC 28273

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13501 South Ridge Drive
Charlotte, NC 28273
USA

Tel: 704-409-1700
Fax: 704-409-1710

A Britax Childcare Group Ltd. company



2. Vehicles or Equipment involved in this defect notification:

Select Britax Boulevard 70 G3, Advocate 70 G3, and Pavilion 70 G3 convertible child seats manufactured from June 11, 2012 through August 31 2012. (Only product codes listed below are affected)

3. Total number of vehicles or items of equipment:

Britax manufactured 60,267 Boulevard 70 G3, Advocate 70 G3, and Pavilion 70 G3 convertible car seats which are included in this campaign with approximately 55,455 seats sold to date in the US and 4,822 seats sold in Canada since June of 2012 and approximately no seats remain in Britax inventory.

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

All of the convertible car seats identified below contain the defect and the HUGS pads are identical across these product platforms. For those same convertible car seats manufactured beginning September 1, 2012 the HUGS pad density and hardness were enhanced to prevent children from biting off pieces of the pads. The HUGS pads also are produced in two colors, gray and fossil, which match the two harness colors available on the convertible child seats at issue. Both the gray and fossil versions of the HUGS pads are included in the campaign.

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The Fashion and Product codes for the Britax convertible seats involved are as follows:

Description	Item
Boulevard 70-G3	
BOULEVARD 70-G3 ONYX	E9LJ91A
BOULEVARD 70-G3 CAITLIN	E9LJ91M
BOULEVARD 70-G3 SILVER BIRCH	E9LJ91S
BOULEVARD 70-G3 CAVALIER	E9LJ92E
BOULEVARD 70-G3 ZEBRA	E9LJ93P
BOULEVARD 70-G3 AZTEC	E9LJ93S
BOULEVARD 70-G3 XE ONYX	E9LK91A
Pavilion 70-G3	
PAVILION 70-G3 ONYX	E9LK31A
PAVILION 70-G3 COWMOOFLAGE	E9LK31Q
PAVILION 70-G3 BLUEPRINT	E9LK32D
PAVILION 70-G3 SOPHIA	E9LK32Z
PAVILION 70-G3 BISCOTTI	E9LK33Q
PAVILION 70-G3 XE ONYX	E9LL11A
PAVILION 70-G3 XE COWMOOFLAGE	E9LL11Q
PAVILION 70-G3 XE BLUEPRINT	E9LL12D
PAVILION 70-G3 XE SOPHIA	E9LL12Z
Advocate 70-G3	
ADVOCATE 70-G3 ONYX	E9LG81A
ADVOCATE 70-G3 SERENE	E9LG83N
ADVOCATE 70-G3 ZEBRA	E9LG83P
ADVOCATE 70-G3 OPUS GRAY	E9LG83X
ADVOCATE 70-G3 ANNA	E9LG83Y
ADVOCATE 70-G3 XE ONYX	E9LL21A
ADVOCATE 70-G3 XE ZEBRA	E9LL23P
ADVOCATE 70-G3 XE ANNA	E9LL23Y

5. Description of the defect:

The three convertible child seats involved include select Boulevard 70-G3, Advocate 70-G3, and Pavilion 70-G3 series seats that began production on June 11, 2012. Those products were manufactured with an enhanced harness system that incorporated a softer

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more pliable, non-toxic material to provide increased safety and comfort. Britax has received three reports that children have bitten off and gagged on pieces of the pads.

6. Chronological summary of events leading to this determination:

The three convertible products at issue began production on June 11, 2012. In late July of 2012 Britax received a report that a child bit off a piece of the pad and the parents requested replacement components. Since July 2012, Britax has received a total of three complaints that children have bitten and gagged on a piece of the pads.

Britax modified the HUGS pads to increase their durability and hardness on September 1, 2012. There have been no reported complaints of pieces of the HUGS pads being bitten from the pads since the modification was made beginning September 1, 2012.

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

Britax will submit draft copies of the Retailer and Consumer notices pursuant to FMVSS 577. Britax will make available more durable replacement HUGS pads to registered consumers and to retailers with current inventory. Britax is prepared to make replacement HUGS pads available beginning November 5th 2012.

If the consumer has concerns that his or her child may bite the HUGS pad, the HUGS pads can be safely removed from the child seat until a replacement pad is received.

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Consumers can continue to use the child seat without HUGS pads until the replacement HUGS pads have been installed.

8. Program for remedy campaign (including program for reimbursing any consumer who obtained the remedy at his/her own expense within one year of the opening of the EA, or within one year of this 573 report, whichever is earlier):

Britax will mail the Consumer Notice and Remedy Kits to all 3021 registered US consumers beginning on November 5, 2012. Information and instructions related to the campaign including an instructional video will be posted on the Britax web site at www.Britaxusa.com/support/safety-notice . It is not necessary to reimburse the consumer as the remedy will be provided at no cost. Britax will mail Retailer Notices also beginning on November 5, 2012.

Respectfully Submitted,

Kenneth Wittenauer
Vice President and General Counsel
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cc: John Abbott

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