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By Recall Management Division at 6:40 am, Jun 30, 2014

14C-004
(4 pages)

June 27, 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: Graco Infant Child Restraint Systems

Dear Ms. Lewis:

Graco Children's Products, Inc. ("Graco") submits this report pursuant to 49 CFR Part 573. Graco has decided to conduct a safety recall with regard to certain infant child restraint systems incorporating the QT1 buckle manufactured by AmSafe Commercial Products, Inc. The attached report identifies the specific infant child restraint models incorporating the subject buckle at issue and their respective dates of their manufacture.

Further investigation reveals a higher than typical level of difficulty unlatching the QT1 buckle. Graco has decided to conduct a safety recall to provide replacement buckles free of charge. The details of the recall are in the attached report.

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

Thank you,



Randy Kiser
Senior Manager, Ethics, Compliance & Safety
Newell Rubbermaid Inc.

Cc: Jennifer Timian (Jennifer.Timian@dot.gov)
Christie Iannetta, Esq. (Christie.Iannetta@dot.gov)

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

Graco Children’s Products, Inc. is the manufacturer of the subject infant child restraint systems.

The QT1 buckles that are the subject of this report were fabricated by AmSafe Commercial Products, Inc., 22937 Gallatin Way, Elkhart, IN 46514 (“AmSafe”).

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:

<i>Infant Child Restraint Model</i>	<i>Affected Date Range</i>
<i>SnugRide</i>	<i>March 2011 – May 2013</i>
<i>SnugRide Classic Connect</i>	<i>March 2011 – May 2013</i>
<i>SnugRide 30</i>	<i>July 2010 – January 2013</i>
<i>SnugRide Classic Connect 30</i>	<i>July 2010 – January 2013</i>
<i>SnugRide 35</i>	<i>May 2011 – January 2013</i>
<i>SnugRide Classic Connect 35</i>	<i>May 2011 – January 2013</i>
<i>SnugRide Click Connect 40</i>	<i>June 2012 – December 2012</i>
<i>Aprica A30</i>	<i>July 2011 – April 2012</i>

Note that some models manufactured within the date ranges above did not utilize the subject QT1 buckle and are therefore not included as part of this report.

49 C.F.R. § 573.6(c)(3): Total Number of Items of Equipment

A total of 1,910,102 affected units were produced with the QT1 buckle.

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

All of the child restraints equipped with the QT1 buckle could potentially experience the issues leading to this recall. To date, approximately 0.044% of the subject units have been reported to have experienced some degree of difficulty operating or unlatching the subject buckles.

49 C.F.R. § 573.6(c)(5): Description

Graco has received complaints that consumers experienced difficulty operating or releasing the QT1 buckles in 0.044% of subject child restraints. To the extent that a caregiver attempts to remove a child from the carrier, rather than removing the carrier from the vehicle, 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 July 2010, Graco first introduced into production a new, off-the-shelf buckle produced by AmSafe. That buckle is referred to as the QT1 buckle. Graco employed the QT1 buckle over time in various convertible and harnessed booster seats, and also in the infant seats listed above. The QT1 buckle release button is a hinged button and must be depressed inward at the top portion of the button in order to most easily release the tongues.

Graco received complaints that the QT1 buckles were difficult to unlatch and at times became stuck in the latched position. As part of its review of consumer contacts with respect to forward-facing convertible and harnessed toddler booster child restraints, Graco observed that AmSafe sculpted the release button on the QT1 buckle to guide the caregiver's finger to the center of the button, rather than towards the top. Consumers relying on touch and pressing in the center of the button would experience higher release forces than they would by pressing the button in the more optimal location near the top edge. Additionally, the position of the buckle close to the child occupant's thighs made manipulation of the buckle more difficult as the child occupant grew in size. Finally, Graco determined that buckles on convertible and toddler units were more likely to become contaminated with foreign material such as food or dried liquids, and that the unique design of the AmSafe QT1 buckle made it more susceptible to the cumulative effects of such contamination. Graco took steps to address consumer dissatisfaction with the new buckles, including introducing new replacement buckles starting in approximately November 2012 that were better optimized for ease of use and less susceptible to fouling by foreign debris. Graco also provided replacement buckles free of charge to consumers upon request, regardless of the age of the child restraint and beyond the normal warranty period.

On October 17, 2012, NHTSA opened an investigation into buckles used on certain Graco car seats. After discussions with NHTSA, Graco informed NHTSA on February 7, 2014, that it had decided to conduct a safety recall to replace all buckles produced by AmSafe (including the QT1 buckle) on convertible and harnessed booster child restraints. Based on its discussion with NHTSA, Graco determined that a safety recall was warranted with regard to forward-facing toddler and harnessed booster car seats due to the probability that, and in addition to the ergonomic issues noted above, the physical orientation and use patterns of those seats with older children increased the potential for foreign material to interfere with the buckle mechanism over time. This in turn could make extraction of the child occupant more difficult in an emergency situation, thereby increasing the risk of injury. At the time, Graco did not initiate a safety recall with regard to infant seats based on Graco's determination that : (1) infants are typically removed from the vehicle secured within the carrier, and not removed directly from the child restraint in the vehicle; (2) the buckles are generally not likely to come into contact with food and drink debris because of the age and developmental maturity of the typical occupant, and (3) the time-in-use will generally avoid any build-up of debris that does enter the buckle.

Graco continued its review of infant child restraint consumer field experience associated with AmSafe buckles. The company has since determined that the QT1 buckle, while having a complaint rate less than 1/4th (or 0.044%) that experienced with the forward-facing units recalled under NHTSA campaign 14C001, does have a higher (by an order of magnitude) complaint rate when compared to peer buckles manufactured by AmSafe or IMMI when used on

similar models of rear-facing-only infant child restraints. Consequently, the company has decided to conduct a recall with regard to Graco infant child restraints that utilize the QT1 buckle.

49 C.F.R. § 573.6(c)(7): Testing Demonstrating a Noncompliance

Not applicable: Testing by Graco and independent third-party laboratories (including testing conducted for NHTSA) demonstrated on numerous occasions that the QT1 buckle fully complied with the applicable requirements of 49 CFR 571.213.

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

Graco will provide information about the recall and a replacement buckle assembly to affected consumers. Graco will add this campaign to its established website devoted to the recall 14C001 (www.gracobucklerecall.com) and use a dedicated toll-free number (877-766-7470) to receive consumer calls. Graco will provide information to retailers notifying them of the affected products (platform, fashion and manufacturing date ranges) sold in their stores.

Graco is also providing a draft letter conforming to 49 CFR 577 for NHTSA’s approval that will be sent to all consumers that have completed registration cards. The timing of the mailing of the Part 577 letters will be shared with NHTSA once NHTSA has approved the text.

Graco has provided some owners of AmSafe QT1 buckles a replacement buckle free of charge. At no time did the company sell replacement buckles to consumers experiencing operational difficulties, and thus the provisions of Part 573 which relate to reimbursing consumers who obtained the recall remedy at their own expense before this notification do not apply.

In addition to the activities outlined above, Graco will continue to conduct a consumer satisfaction campaign covering infant child restraints using AmSafe QT3 and Signature buckles, as set forth in the table below:

<i>Infant Child Restraint Model</i>	<i>Applicable Date Range</i>
<i>SnugRide & SnugRide Classic Connect</i>	<i>December 2012 – February 2014</i>
<i>SnugRide 30 & SnugRide Classic Connect 30</i>	<i>January 2013– February 2014</i>
<i>SnugRide 32</i>	<i>January 2008 – June 2011</i>
<i>SnugRide 35 & SnugRide Classic Connect 35</i>	<i>September 2009 – January 2014</i>
<i>SnugRide Click Connect 35</i>	<i>November 2012 – February 2014</i>
<i>SnugRide Click Connect 40</i>	<i>December 2012 – September 2013</i>
<i>Infant Safe Seat & SafeSeat Step 1</i>	<i>January 2006 – May 2011</i>
<i>Teutonia Tario, Tario 32 & Tario 35</i>	<i>January 2008 – August 2012</i>

Under this consumer satisfaction campaign, the company will provide a replacement buckle at no cost to any consumer upon their request for the useful life of the child restraint. The expiration date for the child restraint is molded into the shell on the underside of the carrier.