

Britax

March 31, 2010



Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
West Building
Washington, DC 20590
202-366-4000

RE: Notice of Canadian Recall - Britax Child Safety, Inc. (Canadian) Frontier™ XT Child Restraint Systems

Dear Sir or Madam;

Pursuant to the United States regulation code 49 part 579.11 under Subpart B entitled "Reporting of Safety Recalls and Other Safety Campaigns in Foreign Countries", Britax Child Safety Inc. will now provide a copy of the "Notice of Motor Vehicle Non-Compliance" as submitted to Transport Canada on March 16, 2010.

Please be aware that this non-compliant issue is confined within Canadian borders, and no U.S. product is affected, as the addition of foam to child restraint headrests is not required in the U.S.

If you have any questions or if further detail is needed, please contact me.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'CDT'.

Charia Q. Dillard-Thompson
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Britax Child Safety, Inc.

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A Britax Childcare company

Frontier XT---Non-Compliance and/or Safety Related Defect Summary

1. Name of manufacturer:

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

Name of Importer:

Britax Child Safety Ltd
PO Box 7289 RPO Brunswick Square
Saint John, New Brunswick E2L 9Z9

Media contact and telephone number

Demetra Bernard 704-409-1687

Consumer contact (i.e. customer service and 800 telephone line number)

Customer Service (1-888-427-4829)

2. Type of restraint system or booster cushion involved (i.e. infant restraint, infant/child restraint, infant/child/booster restraint, child/booster restraint, or booster cushion)

Child/booster restraint

3. Total number of units involved their brand name(s), model name(s) and the complete model number(s).

E9LC3H6	Frontier XT Can Rushmore	858 Units
E9LC3H7	Frontier XT Can Pink Sky	31 Units
E9LC3M6	Frontier XT Can Canyon	<u>152 Units</u>
		1043 Total Units

4. The time period in which the affected units were manufactured RE: Date of Manufacture (DOM), shown with the year, month and day.

The affected Frontier XT units were manufactured from Feb 16, 2010 until March 12, 2010-and shipments into Canada began Feb 19th, 2010.

5. A detailed description of the non-compliance to the applicable Motor Vehicle Restraint Systems and Booster Cushion Safety Standards (RSSR).

Pursuant to RSSR and CMVSS 213 —Child Restraint Systems Schedule 3 (6)

“Every surface of a child restraint system that is contactable for the head of an anthropomorphic test device.....must be covered with slow – recovery, energy –absorbing material that, when tested in accordance with Section 5....”

The affected Frontier XT seats do not contain sufficient energy absorbing materials necessary to comply with the compression-deflection resistance required by this standard.

A detailed evaluation of the safety risk because of the non-compliance and or safety related defect.

The Frontier 85 was manufactured with energy absorbing foam in the head restraint but not with sufficient materials to comply with the RSSR standards

Britax is unaware of any test data, analysis or field/claims data which would indicate that the affected Frontier XT CRS's failure to comply with the requirements of CMVSS 213 Schedule 3 (6) creates a safety risk.

The US version of the Frontier XT, the Frontier 85, was also recently launched in the US and to date there have not been any reported claims either in Canada or the US involving the crashworthiness performance of the Frontier 85 or XT.

6. Chronology of events influencing the determination of the non-compliance and/or safety related defect.

Britax received a consumer inquiry about the perceived difference in comfort foam thickness comparing the legacy Frontier with the Frontier XT on March 4, 2010.

As a result of that consumer inquiry, Britax immediately reviewed the build specifications for the Frontier XT and determined that through oversight, the energy absorbing foam necessary to comply with RSSR was absent from the manufactured products.

7. Details of the corrective action to be taken by your company. In addition, how a consumer can identify an affected product that has been rectified.

Registered consumers and retailers with affected inventory will be sent a remedy kit which will include additional energy absorbing foam and instructions for inserting the foam between the head restraint and the shell of the child restraint. All Frontier XT identified in the notice and manufactured between February 16 and March 12, 2010 are included in the campaign. Frontier XT manufactured after those dates will contain the required energy absorbing material and the boxes will be marked with a sticker so that retailers will be able to confirm that additional inventory has been remedied.

8. How and when will the units at the retailer be fixed? (Note: The affected units are not to be sold to the consumer without the fix being applied).

The retailers will be sent remedy kits which contain the energy absorbing foam and will be provided with stickers to mark the Frontier XT boxes to confirm that the child restraint has been remedied.

9. A copy of the letter to be sent to the retailer advising the retailer of the problem and what to be done with the affected units.

A copy of the letter will be provided to Transport Canada for approval the week of March 22, 2010.

10. Has the proposed fix been tested by your Company and could we have a sample of the fix and the test documents showing the fix is effective.

Please see attached the test reports for the Frontier XT comfort foam showing compliance to the 25% compression-deflection resistance per CMVSS213.

11. Have any incidents been reported in Canada or the United States? If so, how many in each country?

Other than the above referenced consumer inquiry, there have been no reported incidents in Canada. For Frontier 85 manufactured to FMVSS 213, the additional energy absorbing material is not required and no incidents have been reported.

12. Measures to be taken should a consumer wish to return an affected unit to the retail outlet.

Consumers should contact Britax Consumer Services with questions and as necessary to arrange for return of the child seat.

13. How many registration cards have been returned on the units affected?

22 Canadian consumers have registered their Frontier XTs.

14. How will you identify the corrected unit(s) for consumers and retailers that have been modified in your inventory?

All Frontier XT seats manufactured after March 15, 2010 contain the required energy absorbing materials and their boxes will be marked with a sticker to indicate their compliance to the standard. Retailers will also be provided with similar stickers to mark Frontier XT boxes once the seat has been remedied with the necessary energy absorbing material.