Memorandum

U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

Subject: Addition to file

Date: March 30, 2011

From: John Abbott, Safety Defects Specialist
Vehicle Integrity Division

Reply to
Attn of:

To: File EA10-005

Thru: Scott Yon, Chief, Defects Integrity Division

The attached material is submitted to the file:

1.) March 11, 2011 letter from Claude Harris of NHTSA to Mark Evanko of the Dorel Juvenile Group (DJG).

2.) March 14, 2011 letter from Mark Evanko responding to the Claude Harris March 11, 2011 letter.

To: Mark Evanko

CC: Terry Emerson

RE: NHTSA Defect Investigation EA10-005

Mark,

Thank you and Terry for speaking with us via teleconferences on March 3 and March 9, 2011. As I informed DJG during these teleconferences, we are concerned with the scope of the recall DJG initiated on February 10, 2011—specifically, that the recall does not encompass all seats manufactured by DJG that are equipped with the CFA at issue, identified in the subject population of the above-referenced investigation. We have asked DJG to inform the agency as to whether it intends to expand the scope of the recall to include other car seat models equipped with the same CFA. By this email, I am requesting DJG to provide a response to the concerns raised above by close of business Monday, March 14, 2011. If DJG elects not to respond, it will be understood that your position regarding scope is unchanged from that stated in the DJG February 10, 2011 Defect Information Report.

Thank you in advance for your prompt attention to this matter.

Best Regards

Claude Harris
Acting Associate Administrator for Enforcement
National Highway Traffic Safety Administration

DOREL juvenile group

PRIVILEGED AND CONFIDENTIAL March 14, 2011

Mr. Claude Harris
Acting Associate Administrator, Enforcement
NHTSA
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Dear Mr. Harris:

This responds to your question posed on Friday, March 11 to Dorel Juvenile Group (DJG) regarding the scope of the pending safety recall to address reports of performance issues with center front adjusters (CFAs) on certain DJG child restraints manufactured between May 1, 2008 and April 30, 2009.

As we have discussed, DJG has not identified a design or manufacturing defect in the CFAs that are being included in this campaign. In the course of discussions with your staff about resolving your investigation (EA10-005), DJG indicated a willingness to undertake a campaign to address the models with the highest number of complaints. Your staff asked DJG to add a few additional models to the campaign, and DJG agreed. Thus, the scope of the campaign was determined through discussions with your office, and was intended to address the models of concern, rather than indicate an isolation of a design or manufacturing defect in the campaign models.

There are more than 2.5 million units containing the subject CFA that are not included in DJG's campaign population, and there were a total of only 17 complaints involving the CFA performance on these units through December 10, 2010, and several models have no complaints. Objectively, this is an extremely low complaint rate, particularly for a performance condition that is associated with no reports of failures in a crash, or with any injuries or fatalities. This extremely low complaint rate does not warrant an expansion of the scope of the campaign that has been launched.

Sincerely,



Mark Evanko
Executive Vice President
Quality Assurance & Product Safety

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