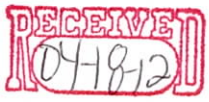
DOREL Juvenile Group

VIA ELECTRONIC MAIL FOLLOWED BY OVERNIGHT CARRIER

4/17/2012

Frank Borris, Director
Office of Defects Investigation
Enforcement
1200 New Jersey Ave. S.E.
NVS 210; Room W45302
Washington, D.C. 20590



RE: EA10-005Sup2 Supplemental Request Response

Dear Mr. Borris;

Dorel Juvenile Group (DJG) is submitting this response to the EA10-005Sup2; Supplemental Request Response. The request is for updated complaint data relative to the center front adjuster Engineering Analysis, EA10-005.

DJG does not believe this additional data suggests any further remedial action is warranted beyond that which has already been undertaken, which is recall 11C-001.

1. *State, by child seat model name and child seat model year, the number of each of the following, received by DJG, or of which DJG is otherwise aware and not previously provided, which relate to, or may relate to, the alleged defect in the subject child seats:*
    a. *Consumer complaints;*

    DJG has received a total of 77 additional complaints. Of these 77 additional complaints, DJG personnel has verified through physical inspection that 35 of the alleged center front adjuster (CFA) slippage concerns do not, in fact, exhibit any problem with the CFA and do perform properly to positively hold the adjustment strap and therefore the harness secure with no indication of slippage. These evaluations were performed by DJG NHTSA Certified Child Passenger Safety Technicians. Even if the units which have been verified as performing correctly are included in the data analysis, it seems clear the previous remedial action is targeting the appropriate units. Actually, the argument could be made there are platforms included previously that should not have been within the scope of the recall.

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Inclusive of the units confirmed to perform correctly, the complaint rate within the recall timeframe of May 1, 2008 through April 30, 2009 of the "recalled" platforms exhibit approximately a 0.024% complaint percentage. The platforms not included exhibit a complaint rate of approximately 0.0009%. This represents a rate difference of over 26 times, that is the complaint rate of the platforms included is more than 26 times that of the non-recalled platforms. Using the same evaluation and excluding those units which were evaluated and performed correctly, the rates are lower. Those in the recall platform are approximately 0.019% while those platforms not included are approximately 0.0007%. This rate difference is over 27 times higher for those platforms in the recalled scope. The data for individual platforms is similar and the data indicates the platforms not included previously in the remedial action should remain outside the scope. The numbers have changed very slightly, if at all, for those platforms not previously included and significant delineation remains.

b. *Reports from retailers or distributors;*

No reports from retailers or distributors to this issue.

c. *Reports involving a crash, injury, or fatality, based on claims against DJG involving a death or injury, or notices received by DJG alleging or proving that a death or injury was caused by the alleged defect in a subject child seats; and*

None

d. *Lawsuits, both pending and closed, in which DJG is or was a defendant or codefendant.*

None

2. *Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 1, state the following information:*
   a. *DJG's file number or other identifier used;*
   b. *The category of the item, as identified in Request No. 1 (i.e., consumer complaint, report from retailer, etc.);*
   c. *Child seat owner's name, address, and telephone number;*
   d. *Child seat brand name;*
   e. *Child seat model name;*
   f. *Child seat model number;*
   g. *Child seat model year;*

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h. *Child seat date of manufacture;*
i. *CFA date of manufacture;*
j. *Incident date;*
k. *Report or claim date;*
l. *Number of alleged injuries; and*
m. *Number of alleged fatalities.*

Please see **Attachment A** entitled, "REQUEST NUMBER TWO DATA UPDATE_SUP2."

3. *Produce copies of all documents related to each item within the scope of Request No. 1. Organize the documents separately by category (i.e., consumer complaints, reports from retailers, etc.) and describe the method DJG used for organizing the documents.*

Please see **Attachment B,** Consumer Complaint Records. These documents are the complaints received and recorded by personnel of DJG's Consumer Relations Department.

In conclusion, as stated previously, DJG does not believe the supplemental data provided indicates the need for any additional remedial action relative to this issue. As outlined in the response to question 1a, the data supports the differentiation of the platforms designated as in and out of scope of the remedial action, 11C-001.

Please contact me with any questions or further information.

Respectfully submitted,

Terry Emerson
Director of Quality Assurance
Dorel Juvenile Group
812-314-4432

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