VIA ELECTRONIC MAIL FOLLOWED BY OVERNIGHT CARRIER

4/29/2010

Scott Yon
Chief of Vehicle Integrity Division
National Highway Traffic Safety Administration
1200 New Jersey Ave. S.E.
NVS 212; Room W48314
Washington, D.C. 20590

RE: PE10-009 Information Request Response

Dear Mr. Yon:

Dorel Juvenile Group (DJG) is responding to the National Highway Traffic Safety Administration (NHTSA) Information Request regarding Preliminary Evaluation PE10-009 of the DJG Vantage child restraint systems. In response to this Information Request, DJG has provided information relative to all the questions including the analyses and evaluations which have been performed. In addition, a summary of the findings and conclusions are provided where appropriate. DJG would like to note this product has been tested extensively before and after introduction into the marketplace. This will be further detailed in this report, but no issue related to the alleged defect has been exhibited as a result of this testing.

DJG does not believe the data and information regarding the alleged issue suggests any remedial action relative to this investigation of the Vantage and the alleged defect of the center front adjuster (CFA). DJG has received a total of 40 complaints related to the alleged CFA issue since production of the Vantage that began in 2001. There have been approximately 1.5 million Vantage child restraints sold since 2001, which results in a complaint percentage of only 0.0027.

1. *State the number of all subject child seats Dorel has manufactured, or imported for sale, in the United States by model number and model year. Please provide the data by monthly production in a table in Microsoft Access 2000, or a compatible format (e.g., Excel), entitled "PRODUCTION DATA."*

   Please see Exhibit A entitled "PRODUCTION DATA"

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2. *State the number of each of the following, received by Dorel, or of which Dorel is otherwise aware, which relate to, or may relate to, the alleged defect in the subject child seats:*
    a. *Consumer complaints;*

        DJG is aware of 42 consumer complaints from initial production of 12/1/2001 through 3/15/2010. Of the 42 complaints, 40 are DJG consumer complaints and 2 are VOQ's from NHTSA. Mr. [redacted] contacted both DJG and the NHTSA regarding the 2 VOQ's, therefore; they are duplicates resulting in only 40 complaints. Of the 42 complaints, a total of 5 (3 DJG and 2 VOQ) complaints are from Mr. [redacted] There have been 1,494,437 Vantage units produced over the past 8 years and this results in a baseline complaint data rate of only 0.0027 percent including Mr. [redacted] seats.

    b. *Reports from retailers or distributers;*

        None

    c. *Reports involving a crash, injury, or fatality, based on claims against Dorel involving a death or injury, or notices received by Dorel 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 Dorel is or was a defendant or codefendant.*

        None

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

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h. *Report or claim date;*
i. *Number of alleged injuries; and*
j. *Number of alleged fatalities.*

Please see Exhibit B entitled "REQUEST NUMBER TWO DATA."

4. *Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, reports from retailers, etc.) and describe the method Dorel used for organizing the documents.*

Please see Exhibit C

5. *State a total count for all of the following categories of claims, collectively, that have been paid by Dorel that relate to, or may relate to, the alleged defect in the subject child seats: warranty claims; extended warranty claims; claims for good will services that were provided; or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.*

Separately, for each such claim, state the following information:
a. *Dorel's claim number;*
b. *Child seats owner's name and telephone number;*
c. *Child seats model number;*
d. *Child sea model Year*
e. *Child seats date of manufacture;*
f. *Repair date;*
g. *Repairing facility's name, telephone number, city and state or ZIP code;*
h. *Labor operation number;*
i. *Problem code;*
j. *Replacement part number(s) and description(s);*
k. *Concern stated by the customer; and*
l. *Comment, if any, by the technician or person(s) making the repair, and/or the person(s) processing the claim that relate to the claim and/or repair.*

Please see Exhibit D entitled "WARRANTY DATA."

6. *Describe in detail the search criteria used by Dorel to identify the claims identified in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the*

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alleged defect in the subject child seats. State the terms of the new child seats warranty coverage offered by Dorel on the subject child seats (i.e., the number of months for which coverage is provided and the child seats systems that are covered). Describe any extended warranty coverage option(s) related to the alleged defect that Dorel offered for the subject child seats and state by option, model, and model year, the number of child seats that are covered under each such extended warranty.

The criteria used to determine the resolution is as follows:

1. DJG searched our consumer relations database system using all Vantage model numbers from inception through 3/15/2010 inclusive of all QA codes.
2. Reviewed each record from the query results, read the record comments and determined the consumer resolution. This indicates whether a refund or replacement seat was part of the resolution.
3. The verification was done by reviewing the shipping records for replacements and the check history for refunds.

7. *Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject child seats that Dorel has issued to any retailers or distributors, regional or zone offices, or other such entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications. Also include the latest draft copy of any communication that Dorel is planning to issue within the next 120 days.*

None

8. *Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject child seats that have been conducted, are being conducted, are planned, or are being planned by, or for, Dorel. For each such action, provide the following information:*

I. Returned Product Evaluations:
   a. *Action title or identifier;*

These are returned units from consumers that a DJG representative reviews per the allegation in question.

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b. *The actual or planned start date;*

As the record indicates

c. *The actual or expected end date;*

As the record indicates

d. *Brief summary of the subject and objective of the action;*

To verify the consumer's allegation

e. *Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and,*

Primarily consumer relations representatives

f. *A brief summary of the findings and/or conclusions resulting from the action.* The consumer relations complaints are included in Exhibit C. Table I reveals the results of the evaluations of Vantage child restraint systems returned to DJG because of an allegation of a CFA issue. Of the eight Vantages evaluated, one unit had the CFA dismantled therefore no determination was made; four exhibited no indication of slippage and should not be considered valid complaints; three did exhibit slippage.

Table I Consumer Returned Vantages Observation Summary

DJG Record #	Model	Mfg Date	Date Reviewed	Summary
* [redacted]	22554	10/8/2008	2/23/2010	CFA slippage
* [redacted]	22554	12/31/2008	2/23/2010	CFA slippage
* [redacted]	22574	9/9/2009	2/23/2010	No CFA slippage Issue
[redacted]	22561	3/28/2004	2/12/2010	No CFA slippage Issue
[redacted]	22561	7/26/2005	10/15/2009	No CFA slippage – threaded incorrectly
[redacted]	22861	10/30/2004	11/29/2007	CFA dismantled – no determination
[redacted]	22864	11/7/2005	6/19/2007	CFA slippage
[redacted]	22561	6/7/2005	3/16/2006	No CFA slippage Issue

*Vantage child restraint systems returned from [redacted]

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In addition to the Vantages in Table I returned for the alleged CFA issue, DJG was able to locate three additional units in storage and review at the product. A visual and physical inspection was performed on these three units. See the additional information in Table II below.

Table II Evaluation of Consumer Returned Vantages

DJG Record #	Model	Mfg Date	Date Reviewed	Summary
[redacted]	*22861*	4/27/2004	4/27/2010	Pawl rotates freely and smoothly, however slippage occurs through adjuster when harness pulled. There is contamination observable on pawl teeth and strap is dirty and stiff. Removed CFA and rinsed with warm water. The resistance to pulling through adjuster greatly increased, however slippage still observed.
[redacted]	22864	11/15/2008	4/27/2010	Pawl rotates freely and smoothly. Harness pulled the CFA strap slips through adjuster. Obvious contamination on pawl. Removed CFA and rinsed with warm water. Visual contamination removed from pawl and CFA no longer exhibits slippage.
[redacted]	22554	9/12/2008	4/27/2010	Slips – the spring is broken so the pawl does not lock on the strap.

As stated in the response to 2a, DJG is aware of forty separate complaints on the Vantage regarding the alleged issue. DJG has subsequently verified that four returned Vantage units did not exhibit any CFA issue but performed exactly as intended, thus the number of complaints potentially exhibiting the alleged issue is thirty-six during the 8 years of production of approximately 1.5 million units. If the same percentage of CFA slipping 6 of 10 (60%) that was seen in the ten units of these two evaluation summaries were to hold for the thirty unverified complaints, eighteen more would exhibit the slippage making a total of twenty-four. The evaluations performed on the eleven returned Vantages do indicate some percentage of the Vantages where CFA slippage is alleged would not exhibit slippage further reducing the total complaint percentage even lower from the 0.0024 percent (36 complaints) stated previously. This is over an 8 plus year period of time.

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II. Vantage Dynamic tests

a. *The actual or planned start date;*

These tests are dynamic simulated crash tests per FMVSS 213 parameters of the Vantage Child Restraint System. These are the tests performed at both DJG and outside test facilities.

b. *Action title or identifier;*

As the record indicates

c. *The actual or expected end date;*

As the record indicates

d. *Brief summary of the subject and objective of the action;*

To observe the Vantage child restraint system, the CFA performance will be verified as part of the test evaluations.

e. *Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and,*

DJG engineers, DJG engineers also reviewed the NHTSA dynamic tests

f. *A brief summary of the findings and/or conclusions resulting from the action.*

Of the 196 dynamic simulated crash tests of the Vantage performed at DJG and the 28 dynamic simulated crash tests of the Vantage performed at outside labs, the only CFA issue observed was the 9/16" of slippage of the Dussault Vantage model 22554 manufactured 10/8/2008. The slippage observed in this test is not a violation of FMVSS 213 as it did not result in any of the measured parameters exceeding FMVSS 213 parameter and the results were very good and comparable to other Vantage test results as shown in the Table III in 8 III.

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III. [redacted] Dynamic Tests

a. *Action title or identifier;*

[redacted] returned 4 Vantages and DJG performed dynamic simulated tests on all four seats.

b. *The actual or planned start date*
See Summary

c. *The actual or expected end date;*
See Summary

d. *Brief summary of the subject and objective of the action;*
Observe whether CFA slippage occurred during dynamic testing

e. *Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and,*
Engineering and Quality requested the testing as part of the evaluations

f. *A brief summary of the findings and/or conclusions resulting from the action.*
As stated previously, the only one test which exhibited any CFA slippage during the dynamic simulated crash tests was the Vantage returned from Bryan Dussault. It exhibited 9/16" of slippage through the CFA, but performed very well relative to the injury criteria measured.

Table III Dussault Dynamic Testing Summary

Platform	Model #	Mfg Date	Test Date	Head Exc	Knee Exc	HIC	CR	Summary
Vantage	22554PCR	10/8/2008	3/3/2010	25.7	28.0	568	46.1	Front adjuster slipped about 9/16"
Vantage	22554PCR	12/31/2008	3/3/2010	25.1	28.4	492	45.66	No Slippage
Vantage	22554PCR	12/31/2008	3/8/2010	23.7	28.6	368	39.63	No Slippage
Vantage	22574PCR	9/9/2009	3/8/2010	24.5	27.6	366	41.92	No Slippage

Exhibit E contains the DJG test reports for Table III.

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IV. [redacted] "cold" slip test

a. *Action title or identifier;*

The impact of cold environmental tests on Bryan Dussault Vantage alleging "cold" CFA slippage on the returned unit manufactured 9/9/09.

b. *The actual or planned start date*

2/22/10

c. *The actual or expected end date;*

2/23/10

d. *Brief summary of the subject and objective of the action;*

To verify the allegation of the cold affecting CFA performance.

e. *Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and,*

Quality group designed and conducted testing

f. *A brief summary of the findings and/or conclusions resulting from the action.*

The subject Vantage was placed in an environmental chamber at 0 degrees F for 16 hours. It was removed and tested for CFA performance at 10 degree F intervals until it reached ambient temperature (70 degree F).

At no temperature from 0 degree F to 70 degree F did the subject Vantage show any affect on the CFA performance from the cold exposure. The Dussault allegation was not confirmed under these conditions and should be considered valid.

Exhibit F contains the test report.

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V. Engineering Evaluation of [redacted] returned Vantages exhibiting CFA issue

a. Action title or identifier;

Engineering evaluation of two Vantages returned from Bryan Dussault exhibiting CFA issue.

b. The actual or planned start date

After received subject Vantage restraints back from NHTSA

c. The actual or expected end date;

April 23, 2010

d. Brief summary of the subject and objective of the action;

Evaluate the CFA's of the subject Vantage to engineering specifications.

e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and,

Engineering is responsible for the evaluation.

f. A brief summary of the findings and/or conclusions resulting from the action.

Mr. [redacted] returned two Vantage child restraints which exhibited the CFA issue; Unit B, original Vantage Mr. [redacted] possessed model 22-554PCR manufactured 10/8/08 and Unit A, one of the two replacement Vantages sent to Mr. [redacted] to replace the original unit also model 22554PCR manufactured 12/31/08. Per the evaluation performed by the engineering personnel on the two CFA's of the units exhibiting slippage, all of the measured values were within specification with the exception of the width of the coil springs. This dimensional difference will not contribute to the issue.

Relative to the data generated, it is inconclusive as to the exact cause of the issue observed in these two units. The two "punch marks" were visible indicating the CFA's had been through the 150 pound proof load testing. All CFA's made during this time period were 100% proof loaded as required by the Process Control Plan. The debris found in each CFA cannot be verified as

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to when it was introduced after production into the CFA or the effect on the proper operation of the CFA. It was observed in both of these units that the CFA had a rough feel to the action of the pawl rotation that is not typical to the CFA.

See Exhibit G for engineering report

VI. Harness Pull Test on [redacted] returned Vantages

a. *Action title or identifier;*

Pull test on harness of Vantage child restraint system returned by [redacted] which exhibited the CFA issue

b. *The actual or planned start date*

3/5/2010

c. *The actual or expected end date;*

3/5/2010

d. *Brief summary of the subject and objective of the action;*

To determine the force necessary to loosen the harness by pulling on the harness itself.

e. *Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and,*

Primarily Quality Assurance

f. *A brief summary of the findings and/or conclusions resulting from the action.*

The harness pull tests on the two Vantages returned from Mr. [redacted] were conducted in the following manner. First, a test dummy representing a one-year-old was placed on each of the two restraints and the CFA straps were marked for identifying the harness position with the one-year-old test dummy. This test dummy represents the lower end weight child who may

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use the Vantage child restraint system (22 pounds). Correspondingly to represent the upper end weight child who may use the Vantage child restraint system, a three-year-old test dummy (36 pounds) was placed in each of the same two restraints and likewise the CFA straps were marked for this harness position. With the test dummy removed, a pull test on the buckled harness system was performed by pulling just above the harness retainer with a tube allowing both shoulder harness straps to be pulled simultaneously. A total of ten pulls were performed at each of the two harness adjustment positions established by the 1 and 3 year-old test dummies for each of the two Vantages. These pull test values were recorded and graphed as shown in the test report in Exhibit H.

The original Vantage seat Mr. [redacted] 22554, mfg 10/8/2008 took a force of between 8.6 and 29.0 pounds to cause loosening. The replacement seat 22554, manufactured 12/31/2008, took a force of between 16.0 and 42.2 pounds to release. DJG has not determined the relevance of this data. A few of the complaints do reference the harness straps loosening on their own, or the child being able to loosen the harness straps. However, again the percentage of CFA complaints on the Vantage is extremely low and this is not showing to be a trend.

VII. Supplier CFA Control Plans and DJG CFA Quality Requirement

DJG is providing the CFA Process Control charts for the three suppliers of the CFA to DJG over the life of the Vantage. The plans are from IMMI who supplied the CFA from inception of the Vantage until 9/24/2003, GBG from 9/24/2003 until 7/13/2006 and then IMS from 7/13/2006 through current.

See Exhibit I for Control Plans and Quality Requirements.

In addition is included the DJG Quality Requirement for the CFA. DJG believes a fundamental reason for the extremely low complaint rate is the robust quality requirement and the control plans which lead to a consistently good performance of the Vantage CFA. Back up documentation can be provided upon request.

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9. *Describe all modifications or changes made by, or on behalf of, Dorel in the design, material composition, manufacture, quality control, supply, or installation of the subject components, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject child seats. For each such modification or change, provide the following information:*

    a. *The date or approximate date on which the modification or change was incorporated into child seats production;*
    b. *A detailed description of the modification or change;*
    c. *The reason(s) for the modification or change;*
    d. *The part numbers (service and engineering) of the original component;*
    e. *The part number (service and engineering) of the modified component;*
    f. *Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;*

    As shown in Table IV below, the Vantage child restraint system which began production in December of 2001 originally incorporated the Indiana Mills and Manufacturing Inc. (IMMI) 1-1/2" wide strip center front adjuster. On September 24, 2003, DJG switched to Vantage to utilizing a 1" wide strap center front adjuster from another supplier, Good Baby Group (GBG). On July 13, 2006, DJG again changed suppliers to a 1" wide strap version from IMS (Safety Plus). Other changes are listed on the summary table below.

    g. *When the modified component was made available as a service component; and,*
    h. *Whether the modified component can be interchanged with earlier production components.*

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Table IV Modification / Summary

Date of Change a	Description of Change b	Reason for Change c	Original Part number d	Modified part number e	Original withdrawal from prod f	Service component g	Interchanged h
9/24/2003	Change from IMMI 1-1/2 adjuster (CFA) on HBB model to GBG 1" adjuster	Cost and supplier issue	4316-1490	4316-1588	9/24/2003	NA	Platform dependant
2/25/2004	spin rivet	Product Improvement	4316-1588	4316-1598	2/25/2004	NA	Yes
9/1/2005	Instituted 100% proof loading into CFA process	Quality Control change	Same	Same	9/1/2005	NA	Yes
7/13/2006	Supplier change from GBG to IMS/Safety Plus	Supply issue	4316-1598	4316-1638	7/13/2006	NA	Yes
1/28/2008	Changes to small splitter plate	Product Improvement	4316-1638	4316-1642	1/28/08	NA	Yes
3/27/2009	Change pivot pin add black coating	Reduce friction	4316-1642	4316-1682	3/27/2009	NA	Yes
4/20/2009	Change pawl profile	To improve tensile performance	4316-1682	4316-1687	4/20/2009	NA	Yes

DJG continues to investigate any changes which may have occurred regarding the manufacture of the CFA throughout its history.

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10. Furnish Dorel's assessment of the alleged defect in the subject child seats including:

a. The causal or contributory factor(s);

b. The failure mechanism(s);

c. The failure mode(s);

There are several factors which could affect the ability of the CFA to lock properly. In the case of the Vantage, the percent of occurrence that this has alleged to have taken place is extremely low, 0.0027 percent, 40 alleged CFA slippages in 1,494,437 Vantages produced. The percent is actually somewhat lower as not all alleged CFA slippages do in fact slip. There is always a theoretical possibility of a production error in the manufacturing process though these were 100% proof loaded with 150lb force on the manufacturing line. This certainly has not shown itself to be an issue relative to the Vantage CFA at this time. We do have one example of a broken spring, again there is no evidence this is anything but an isolated case. The shipping of the CFA's could potentially damage the CFA. They are relatively heavy components put in cardboard boxes, 120 per box, on skids, thirty boxes per skid and the skids are stacked to conserve space. Handling of the CFA's during the packing process or unpacking and production process could cause damage. DJG has no evidence of damage caused in shipping or handling at this time. Abuse by consumers could also cause CFA damage. Prying, pounding, cleaning, or a multitude of consumer actions could cause the CFA to exhibit performance issues. DJG has seen the CFA dismantled, and the pawl scratched for instance.

A primary factor which can affect the ability of the CFA to lock properly is contamination. There are many different types of potential contamination which can affect the CFA in several areas. The pawl teeth can be contaminated affecting the bite of the pawl to the strap. The area between the pawl and the frame, as well as the pin surface the pawl rotates on can become contaminated affecting free rotation of the pawl. The CFA strap itself can become contaminated. Many different substances can act as a contaminate to the CFA. Food, drinks, fabric fibers, sand, dirt, gum, all types of child related "debris" have been observed in the child restraints in many areas including the CFA. The result can be the CFA does not function as intended.

Upon examination of Mr. [redacted] returned child restraint systems, the operation of the pawls was not entirely "free" to rotate in two of the four seats. These were the restraints which exhibited some amount of "slippage" through

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the CFA adjuster. As shown in the engineering report on these two units, dimensionally they met criteria with the exception of the coil spring width, which is not critical to the issue in question. There is a significant difference between the two returned units exhibiting the CFA issue from Mr. [redacted]. The original Vantage returned 22554PCR manufactured 10/8/2008 exhibited the slippage at a much lower force than the replacement unit of the same model manufactured 12/31/2008 as shown in the testing performed in 8 IV. In the operation of the CFA the pawl of the original Vantage did not rotate as freely. The CFA of the replacement Vantage did show much more resistance during the pull test. During dynamic test the original Vantage had a CFA strap movement of approximately 9/16" where the replacement had none. Both easily passed the requirements of the FMVSS 213 dynamic test parameters.

Although we were able to confirm two of [redacted] Vantage child restraints exhibiting CFA slippage, in the context of the overall field experience, DJG concludes Mr. [redacted] having two Vantages is not predictive of the performance of this product in the field because of the overall extremely low percentage of alleged non function.

d. *The risk to child seat safety that it poses;*

There are two potential "risks" associated with a CFA which doesn't lock properly. First, if the CFA doesn't hold securely in a crash this could lead to a lack of proper restraint of the child. This could lead to increased excursions, other injury risks, or possible ejection. On Mr. [redacted] units, this doesn't appear to be the case as evidenced in the dynamic crash tests performed on the returned seats by DJG. The second risk is that slack may be introduced into the harness system prior to a crash. If the harness is loosened by the child through direct actions or through braking, slack is introduced into the harness. Again the result is potential increased excursions and other injury potentials. DJG has no field reports or data that either of these potential risks have occurred in the field.

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e. *What warnings, if any, that the alleged defect was occurring or that the subject component was malfunctioning; and*

The caregiver should notice the harness has loosened due to slack or extra webbing when removing the child from the restraint.

f. *The reports included with this inquiry.*

DJG's assessment is described throughout this document particularly in response to number 8.

DJG has determined there is no safety defect in the Vantage child restraint system. The investigation into the Vantage CFA issue confirms there is no safety defect and there have been very few CFA issues seen over the 8 year life span of the Vantage and they have performed very well in the field.

If you have further questions, please contact me.

Respectfully Submitted,

Terry Emerson,
Director of Quality Assurance,
Child Restraint Systems and Regulatory Affairs
Dorel Juvenile Group
812-314-4432

Cc: O. Kevin Vincent