Memorandum

U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

Subject: Test Request: Evaluation of Occupant Harness Buckle

Date: March 18, 2013

From: Frank Borris, Director
Office of Defects Investigation

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Date: 2013.03.18 16:08:13 -04'00'

Reply to Attn of: NVS-212jfa
EA13-001

To: Roger Saul, Director
Vehicle Research and Test Center

This memorandum requests the Vehicle Research and Test Center (VRTC) to conduct the testing and evaluation as described below.

BACKGROUND: The Office of Defects Investigation (ODI) is conducting an Engineering Analysis (EA13-001) concerning the occupant harness buckle in certain model year (MY) 2009 through 2012 child safety seats manufactured by Graco Children's Products, Inc. Consumers report having difficulty in unlatching the harness buckle on their subject child seats, stating that excessive force and/or effort is required to actuate the release button to unlatch the harness. Some consumers reported not being able to unlatch the buckle at all and were forced to remove their child by pulling them through the still buckled harness, or in some cases, by cutting the harness straps.

The subject child seats utilize two different types (designs) of harness buckles, the "Signature" and the "QT" types, both of which are subject to the investigation. Each buckle type operates differently and has dissimilar latching and actuating mechanisms. The Signature buckle has a sliding release button that must be pushed downward to release the harness, while the QT buckle has a button that must be pushed inward to be released.

OBJECTIVES: The objectives of this test program are: 1) to identify the root cause as to why the buckles are difficult to open or cannot be opened, and 2) to determine if the subject child seats comply with FMVSS 213 Child restraint systems S5.4.3.5 Buckle release requirements.

TEST SAMPLE CHILD SEATS: ODI will provide VRTC with sample subject car seats and buckles used in the field. The seats were obtained from ODI complainants. ODI will attempt to obtain more sample seats from consumers.

RECOMMENDED APPROACH: VRTC should prepare a test plan designed to meet the above test objective. A flexible approach may be taken, but the ODI test monitor, Mr. John Abbott, should be kept informed of all developments that require changes to the original test plan. John can be reached at john.abbott@dot.gov and on (202) 366-5221.

REPORTS: A test report shall be provided upon completion of testing.

SCHEDULE: We would like to have the testing completed by June 28, 2013.

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