U.S. Department of Transportation

National Highway Traffic Safety Administration

ODI RESUME

OFFICE OF DEFECTS INVESTIGATION

NHTSA

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Investigation: EA 14-003
Prompted by: PE 14-003
Date Opened: 07/07/2014 **Date Closed:** 10/31/2014
Investigator: John Abbott **Reviewer:** Scott Yon
Approver: Frank Borris
Subject: Car Seat Harness Buckle

MANUFACTURER & PRODUCT INFORMATION

Manufacturer: Evenflo Company, Inc.
Products: 2011-2014 Embrace Rear Facing Infant Seats
Population: Confidential

Problem Description: Difficulty unlatching the harness buckle.

FAILURE REPORT SUMMARY

	ODI	Manufacturer	Total
Complaints:	2	72	73**
Crashes/Fires:	0	0	0
Injury Incidents:	0	0	0
Fatality Incidents:	0	0	0

** Total eliminates duplicates received by ODI and manufacturer.

ACTION / SUMMARY INFORMATION

Action: Close this Engineering Analysis. See NHTSA recall 14C-006 for recall details

Summary:

On January 31, 2014, the Office of Defects Investigation (ODI) opened this investigation as PE14-003 based on 18 reports from consumers alleging the harness buckle on their convertible or booster car seat was difficult to unlatch or would not unlatch. Separately, ODI's investigation of harness buckles (see EA13-001) in Graco Children's Products, Inc. (Graco), revealed that the Evenflo Company, Inc. (Evenflo) also used QT1 and QT3 harness buckles supplied by AmSafe Commercial Products, Inc. in car seats that Evenflo produced.

On February 7, 2014 Graco submitted a Defect Information Report (DIR) to recall approximately 3.7 million Graco convertible and booster car seats produced with QT1 and QT3 buckles. Graco did not, at that time, recall its Rear Facing Infant (RFI) seats that used the same buckles.

On April 2, 2014, Evenflo submitted a DIR to recall approximately 1.3 million convertible and booster car seats produced with QT1 and QT3 buckles. Like Graco, Evenflo excluded its RFI car seats from this recall.

On June 27, 2014, Graco submitted a DIR which expanded its earlier recall to include approximately 1.9 million Graco RFI car seats produced with QT1 buckles. Graco also committed to conduct a Customer Service Campaign with notification to registered consumers to replace the QT3 harness buckles.

On July 7, 2014 ODI upgraded this investigation to Engineering Analysis EA14-003 to continue its investigation concerning Evenflo's RFI car seats. On August 29, 2014, in response to an ODI information request, Evenflo disputed that a safety risk was present in the buckles and claimed that in an emergency situation the entire car seat could be removed from the vehicle, with the child inside.

On October 14, 2014, the Agency contacted Evenflo, and advised that the Agency was prepared to send a Recall Request Letter if the company did not recall the RFI. As stated to Evenflo, it was the Agency's position that the car

seats should be recalled because the same QT1 buckles had already been recalled by Graco in its RFI; the complaint data was sufficient to warrant a recall; and, there was no evidence that any differences in the configuration of Evenflo RFI compared to Graco's RFI had an impact on the functioning of the buckle. The Agency had previously described to Evenflo its serious concerns about the inherent safety risk present when a child in an RFI needed to be quickly removed from a vehicle due to an emergency situation and the buckle was difficult to or would not open.

On October 20, 2014, Evenflo submitted a DIR recalling 202,346 RFI car seats produced with the QT1 buckles. In its chronology, Evenflo states that the company had received 10 consumer complaints of difficulty opening the buckle. However, at the time the DIR was submitted the Agency was aware of 71 unique complaints submitted to Evenflo and there were two additional complaints made directly to the Agency. The DIR also stated that Evenflo would conduct a Customer Awareness Campaign (CAC) to replace the QT3 buckles used on the non-recalled RFI models. Registered owners of both the recalled seats and the seats covered by the CAC will receive notification letters informing them of the recall and CAC action. Evenflo's two recalls and CAC action covers all Evenflo car seats produced with QT1 and QT3 buckles. Evenflo's DIR states that it voluntarily recalled its convertible and booster seats in April 2014. Under the National Traffic and Motor Vehicle Safety Act, a manufacturer of an item of replacement equipment is, in fact, obligated to provide notice once the manufacturer learns that the item of equipment contains a defect related to motor vehicle safety. See 49 U.S.C. § 30118(c). ODI is closing this investigation based on Evenflo's recall and CAC actions to replace the buckles in all of the car seats it produced with QT1 and QT3 buckles.

The ODI reports cited above can be viewed at SaferCar.gov under the following ID numbers: 10617909, 10632290.