EXHIBIT E. REQUEST NO. 9 DATA

INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

COLUMBUS
TRADING - PARTNERS

phone: 937-415-3215
mobile: 937-581-7222
e-mail: Amy.Blankenship@goodbabyint.com
www.goodbabyint.com

Columbus Trading-Partners USA Inc.
225 Byers Rd.
Miamisburg, Ohio 45342
United States

July 22, 2020

BY ELECTRONIC MAIL
Samuel F. Wilson II
Elizabeth Wolfe
National Highway Traffic Safety Administration
Room W45-221
1200 New Jersey Avenue SE., Washington, DC 20590
Email: Samuel.Wilson2@dot.gov
Elizabeth.Wolfe@dot.gov

RE: Sirona M-Head Rest Foam

Dear Ms. Wolfe and Mr. Wilson:

This letter responds to your request on July 16, 2020, for additional information about the Cybex Sirona M Child Restraint ("Sirona M"), distributed by Columbus Trading-Partners USA Inc. ("CTP"). Specifically, you requested information about the type of foam used in the head rest of the seat under the seat pad and the change that CTP made to address early consumer feedback that some children could access the foam in this area.

As I expressed in our telephone call, CTP closely tracked the feedback from consumers on Sirona M upon release of the car seat in the U.S. marketplace in early 2018. Early on, we received a few reports that children could access the foam under the seat pad in the head rest area, and could/did place foam pieces in their mouths.

CTP analyzed the feedback and determined that (1) there was no safety risk if a child was able to access the foam, as the foam cell size was very small and would not have the potential to restrict or block a child's airway if ingested; and (2) to eliminate the

potential caregiver concern if a child was able to pick or scrape the foam, the accessible edge would be wrapped in tape moving forward.

CHILD ACCESS TO THE HEAD REST DOES NOT PRESENT AN UNREASONABLE SAFETY RISK:

The structure of the Sirona M is primarily rigid plastic. Like many car seat manufacturers, Cybex utilizes foam in the child-contactable surfaces of the Sirona M for safety and comfort purposes. The foam used in the Sirona M is EPS—expanded polystyrene—which is commonly used in the car seat industry.

As depicted in the attached video, EPS is used in the head rest because of its ability to absorb forces in a vehicular crash and help protect a child-occupant's head and neck from injury. Also apparent from the video is the small bead size of the EPS used in Sirona M. The EPS 15g/L bead size is around 3～4mm. This small size means that if a child accesses the EPS and picks or scrapes its surface, the EPS tends to release in very small pieces.

This conclusion is supported by the field reports the company has received. While caregivers have expressed understandable concern when unsupervised children have accessed the area, scraped at the EPS and put the EPS pieces in their mouth, no large pieces have liberated to create a potential choking or obstruction hazard.

AN ENGINEERING CHANGE ELIMINATED A CHILD'S ABILITY TO LIBERATE EPS IN THE HEAD REST:

To address consumer feedback and concern, on August 24, 2018, an engineering change was implemented to add tape to the lower edges of the EPS in the Sirona M head rest. Now, if an unsupervised child accesses that area, he/she will be unable to pick or scrape at the EPS.

Please find below photos depicting the areas where tape has been added:

July 22, 2020



(ABOVE) ASSEMBLED EPS HEAD REST WITH TAPE PRIOR TO GLUING ONTO THE CAR SEAT PLASTIC SHELL. (MASKING TAPE IS NOT THE TAPE USED, BUT FOR ILLUSTRATION PURPOSES ONLY TO CONTRAST WITH WHITE EPS).



(ABOVE) MIDDLE SECTION OF HEAD REST WITH PORTION IMPACTED MARKED IN TAN TAPE.

July 22, 2020



(ABOVE) SIDE WINGS OF HEAD REST WITH IMPACTED PORTION MARKED IN TAN TAPE.

The company has not received any reports of children picking or scraping at the EPS in Sirona M head rest for seats manufactured after the August 24, 2018 implementation date for this change. We believe, therefore, that the condition has been addressed.

CTP appreciates the opportunity to respond to NHTA's request and hopes that this response not only provides the requested information but also alleviates any safety concern the agency may have had about the Sirona M.

Please let me know if you have additional questions.

Best Regards,

[redacted]

Amy E. Blankenship

Attachment--video