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

Nuna Baby Essentials Inc
70 Thousand Oaks Boulevard, Morgantown, PA 19543

June 21, 2024

Tanya Topka
Director, Office of Defects Investigation
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

RE: Nuna Baby Essentials, Inc.'s Response to Defect Petition (DP24-003)

Dear Ms. Topka,

On behalf of Nuna Baby Essentials, Inc. ("Nuna"), please find below Nuna's response to the information requested pursuant to NHTSA's Defect Petition letter (DP24-003).

NHTSA's Request No. 1:

State, by model and production year, the number of subject Equipment NUNA has manufactured for sale or lease in the United States. Separately, for each piece of Subject equipment manufactured to date by NUNA, state the following:

a. Equipment identification number (Serial Number/Model Number);
b. Make;
c. Model;
d. Production Year;
e. Subject component part number and design version installed as original equipment;
f. Date of manufacture (MM/DD/YYYY);
g. Date warranty coverage commenced (MM/DD/YYYY); and
h. The State in the United States where the equipment was originally sold, or delivered for sale (postal abbreviation).

Provide the table in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

Nuna's Response to Request No. 1:

[redacted]

[redacted]

NHTSA's Request No. 2:

State the number of each of the following, received by NUNA, or of which NUNA is otherwise aware, which relate to, or may relate to, the alleged defect in the Subject equipment:

a. Consumer complaints, including those from fleet operators.
b. Field reports, including retailer reports;
c. Reports involving a crash, injury or fatality;
d. Property damage claims;
e. Third-party arbitration proceedings, both pending and closed, where NUNA is or was a party to the arbitration; and
f. Lawsuits, both pending and closed, in which NUNA is or was a defendant or codefendant.

For subparts "a" through "f" state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same equipment are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" through "f" provide a summary description of the alleged problem and causal and contributing factors and NUNA's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f" identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Nuna's Response to Request No. 2:

With regard to subpart (a), Nuna states that consumer complaints related to the Rava car seat have been gathered from two Consumer Management Systems (CMS), as described in greater detail in response to Request No. 6.

[redacted]

[redacted]

NHTSA's Request No. 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. NUNA's file number or other identifier used;
b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
c. Equipment owner, email address and telephone number (please use distinct fields for each data type);
d. Equipment owner street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);
e. Equipment's serial number
f. Equipment's Model Number;
g. Equipment's make, model and Production year (please use distinct fields for each data type);
h. Age of Equipment at time of incident (numeric data type in months);
i. Incident date (MM/DD/YYYY);
j. Report or claim date (MM/DD/YYYY);
k. Whether a crash is alleged;
l. Whether property damage is alleged;
m. Number of alleged injuries, if any; and
n. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

Nuna's Response to Request No. 3:

Nuna refers NHTSA to its response to Request No. 5 below.

NHTSA's Request No. 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, field reports, etc.) and describe the method NUNA used for organizing the documents. Describe in detail the search methods and search criteria used by NUNA to identify the items in response to Request No. 2.

Nuna's Response to Request No. 4:

[redacted]

NHTSA's Request No. 5:

State, by model and production year, a total count for all of the following categories of claims, collectively, that have been paid by NUNA to date that relate to, or may relate to, the alleged defect in the subject equipment: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin, customer satisfaction campaign, or similar service action.

Separately, for each such claim, state the following information:

a. NUNA's claim number;
b. Equipment owner, email address and telephone number (please use distinct fields for each data type);
c. Equipment owner street address, city, state (postal abbreviation), and ZIP code (please use distinct fields for each data type);
d. Equipment's Serial Number
e. Equipment's Model Number;
f. Repair date (MM/DD/YYYY);
g. Age of equipment at time of claim (numeric data type in months);
h. Replacement part number(s) and description(s);
i. Concern stated by customer;
j. Cause as stated on the repair order or similar document;
k. Correction as stated on the repair order or similar document; and
l. Additional comments, if any, by technician relating to claim and/or repair.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "WARRANTY DATA." A pre-formatted data collection file, which provides further details regarding this submission, will be provided to you.

Nuna's Response to Request No. 5:

Please find enclosed with Nuna's submission an accompanying file marked as "REQUEST NUMBER 2 DATA PLUS WARRANTY 06212024."



[redacted]

NHTSA's Request No. 6:

Describe in detail the search methods and search criteria used by NUNA to identify the claims in response to Request No. 5, including the labor operations, part numbers and any other pertinent parameters used.

Nuna's Response to Request No. 6:

[redacted]

[redacted]

[redacted]

[redacted]

NHTSA's Request No. 7:

State, by make and Production year, the terms of the new equipment warranty coverage offered by NUNA on the subject equipment (i.e., the number of months for which coverage is provided and the equipment components that are covered). Describe any extended warranty coverage option(s) that NUNA offered for the subject equipment and state by option, model, and production year, the number of equipment that are covered under each such extended warranty.

Nuna's Response to Request No. 7:

[redacted]

NHTSA's Request No. 8:

Furnish OEM's position on the petitioner's alleged defect in the subject equipment, including:

a. The causal or contributory factor(s);
b. The risk to motor vehicle safety that it poses; and
c. The reports included with this inquiry.

Nuna's Response to Request No. 8:

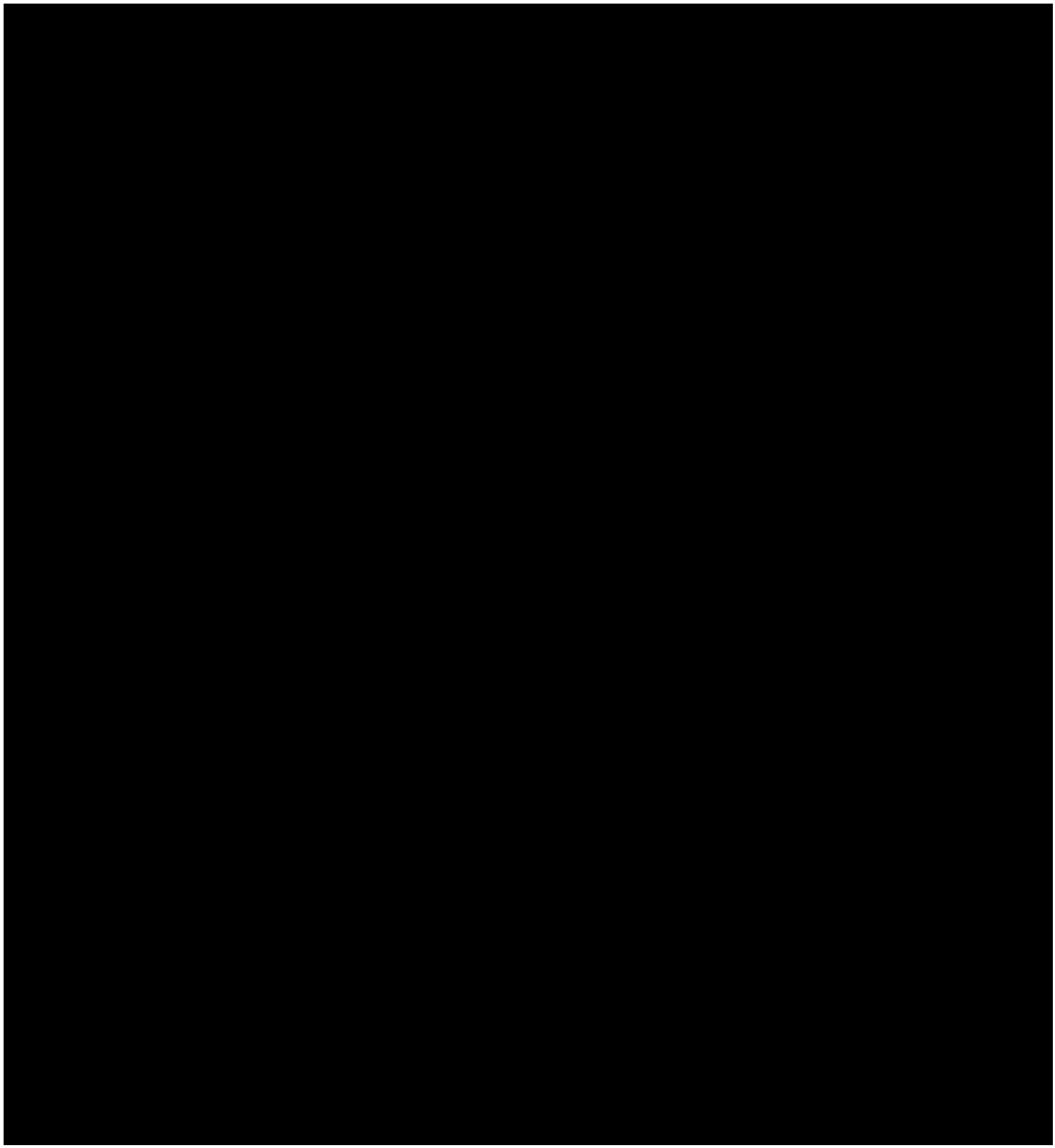
With respect to each subpart (a) through (c) above, Nuna provides the following response:

[redacted]



See, e.g., NHTSA Incident Complaint ID No. 11466667 (**Chicco**), May 30, 2022; NHTSA Complaint ID No. 11467325 (**Chicco**), June 3, 2022; NHTSA Complaint ID No. 11469142 (**Chicco**), June 14, 2020; NHTSA Complaint ID No. 11244865 (**Chicco**), Aug. 10, 2019; NHTSA Incident Complaint ID No. 11495467 (**Britax**), Nov. 30, 2022; NHTSA Incident Complaint ID No. 11436507 (**Britax**), Oct. 10, 2021; NHTSA Complaint ID No. 11155048 (**Britax**), April 1, 2018; NHTSA Complaint ID No. 10906422 (**Britax**), Sept. 3, 2016; NHTSA Complaint ID No. 10851653 (**Britax**), March 25, 2016; NHTSA Complaint ID No. 10825673 (**Britax**), Feb. 11, 2015; NHTSA Complaint ID No. 10882352 (**Britax**), July 2, 2016; NHTSA Complaint ID No. 11436507 (**Britax**), Oct. 10, 2021; NHTSA Complaint ID No. 11061521 (**Britax**). Jan. 9, 2018; NHTSA Complaint ID No. 10923881 (**Britax**), Oct. 4, 2016; NHTSA Complaint ID No. 11548550 (**Britax**), June 30, 2023; NHTSA Incident Complaint ID No. 11443832 (**Cybex**), Dec. 11, 2021; NHTSA Complaint ID No. 11430176 (**Cybex**), Aug. 23, 2021; NHTSA Complaint ID No. 11473600 (**Cybex**), July 2, 2022; NHTSA Incident Complaint ID No. 11487761 (**Evenflo**), Oct. 2, 2022; NHTSA Incident Complaint ID No. 11537393 (**Evenflo**), July 23, 2023; NHTSA Incident Complaint ID No. 11585328 (**Evenflo**), April 25, 2024; NHTSA Incident Complaint ID No. 11570905 (**Evenflo**), Jan. 1, 2024; NHTSA Incident Complaint ID No. 11193667 (**Evenflo**), April 3, 2019; NHTSA Complaint ID No. 11229982 (**Maxi Cosi**), July 7, 2019; NHTSA Complaint ID No. 11519657 (**Maxi Cosi**), Jan. 9, 2023; NHTSA Complaint ID No. 11583194 (**Diono**), April 15, 2024; NHTSA Complaint ID No. 11508101 (**Diono**), Feb. 17, 2023; NHTSA Incident Complaint ID No. 11383205 (**Graco**), Dec. 12, 2020; NHSTSA Complaint ID No. 11504256 (**Graco**), Jan. 29, 2023; NHTSA Complaint ID No. 11504334 (**Graco**), Jan. 29, 2023; NHTSA Complaint ID No. 11476784 (**Graco**) July 29, 2022; NHTSA Complaint ID No. 11441527 (**Graco**), Nov. 17, 2021; NHTSA Complaint ID No. 11526722 (**Graco**) June 5, 2023; NHTSA Complaint ID No. 11546272 (**Graco**), July 1, 2023; NHTSA Complaint ID No. 11433362 (**Graco**), Sept. 16, 2021; NHTSA Complaint ID No. 11185146 (**Graco**), Mar. 8, 2019; NHTSA Complaint ID No. 11499501 (**Graco**), Dec. 29, 2022; NHTSA Complaint ID No. 11453489 (**Graco**), Feb. 22, 2022; NHTSA Complaint ID No.

11509429 (**Graco**), Feb. 27, 2023; NHTSA Complaint ID No. 11023148 (**Baby Trend**), Sept. 5, 2017; NHTSA Complaint ID No. 11130536 (**Baby Trend**), Aug. 1, 2018.



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Respectfully submitted,

[redacted]

Product Development Vice President
Nuna Baby Essentials Inc.