

**UNITED STATES DEPARTMENT OF TRANSPORTATION
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION**

1200 New Jersey Avenue SE
Washington, DC 20590

In re:

AQ24-001

Evenflo Company, Inc.; Revolve360 Products
Certification

RESPONSE OF EVENFLO COMPANY, INC. TO SPECIAL ORDER

Evenflo Company, Inc. (“Evenflo”) responds to the Special Order in the captioned matter dated April 18, 2024 (“Special Order”) in numbered paragraphs corresponding to the numbers assigned to the requests in the Special Order as follows:

Request No. 1:

Provide the name, model number, and a complete description of any product certified as complying with FMVSS No. 213 and manufactured, imported, delivered, offered for sale, or sold in the United States by you that has rear-facing and forward-facing use modes and a detachable base, including but not limited to the Revolve360, Revolve360 Slim, and Revolve360 Extend.

- a. Of the products identified, state which products rely on a detachable base for vehicle installation.
- b. For each product that relies on a detachable base for vehicle installation, state its use mode(s) and each means of installation on which it relies under FMVSS No. 213 S5.3.2: Type 1 seat belt assembly only; child restraint anchorage system only; and Type 1 seat belt assembly plus a tether anchorage only (if needed to comply with S6.1).

Response:

The Revolve360, Revolve360 Slim and the Revolve360 Extend (the “Revolve Family Products”) constitute all the products sold by Evenflo in the United States that have rear-facing and forward-facing use modes and a detachable base. Neither the seat shell nor the base is designed or intended to be used by

itself in a motor vehicle to seat, position or restrain a child. Each of the Revolve Family Products relies upon a detachable base for vehicle installation, in the sense that the base is intended to be installed prior to affixing the shell to the base. The model numbers associated with these products and the trim level variants thereof, along with the information responsive to subparts (a) and (b) of the request, are set forth on Exhibit A hereto.

Request No. 2:

Separately by model designation or other designation used by you, for each and every product identified in 1:

- a. State each and every basis, including but not limited to each and every test and analysis, and identify all other relevant materials, that you or any other company considered or relied upon in certifying each product to the requirements of FMVSS No. 213.
- b. For each test or analysis identified in response to 2a, provide a copy of such test and analysis, the name and address of the testing facility, a full description of the product tested, and a summary of the test results. Also identify at what phase of development or production each test was performed, including but not limited to pre-production, first article, production, or certification.
- c. Identify which test(s) and analyses provided in response to 2b served as your basis for certification to each of the following requirements of FMVSS No. 213:

S5.1 Dynamic Performance

S5.3 Installation

S5.4 Belts, belt buckles, and belt webbing

S5.5 Labeling

S5.6 Printed Instructions for Proper Use

S5.7 Flammability

S5.8 Information requirements – attached registration form and electronic registration form

viii. S5.9 Attachment to child restraint anchorage system.

Response:

Page Includes Information for which Confidential Treatment is Sought - 49 CFR 512

The Revolve Family Products were certified as compliant to the various requirements of FMVSS 213 in reliance upon a wide variety of internal and external tests. A summary of those tests and the specific requirements to which they pertain is contained with spreadsheets addressing each Revolve Family Product identified in Exhibit B and produced separately, along with the test reports and associated documents.

Request No. 3:

Separately, for the Revolve360 and all identical or substantially similar products:

- a. Explain in detail the factors that led to Evenflo's decision to incorporate a detachable base in the design of the product, and the modes of use (e.g., forward-facing, rear-facing, high-back booster) where each factor played a role.
- b. Explain how each factor identified in 3a influenced the product's means for vehicle installation and mode(s) of use.
- c. Produce a copy of each and every written and transcribed communication Evenflo had regarding the certification, specifications, and requirements of the product including, but not limited to the design, labeling, and printed instructions for use.

Response:

(a) and (b)

Evenflo initiated the Revolve Project under the internal code name [REDACTED]. The primary driving feature of this project was to create an "all in one" (rear facing, forward facing and booster) child restraint with the ability for the caregiver to rotate the seat to improve the ease of securing the child in the seat and removing them from the seat. Qualitative internal market research indicated that correct securement of the child in the child restraint was perceived as one of the primary difficulties for caregivers using car

seats. Additionally, the ability to change the seat from rear facing to forward facing without needing to uninstall and reinstall the seat was another reported difficulty.

As the initial design work began, it became apparent that the rotational aspects of the design created geometry that made installation of the product difficult due to the shell obstructing the space around the belt path. In the process of negotiating the complexity of these design constraints it became apparent that if the shell could be removed from the base it would provide a much easier installation experience for the caregiver. This is analogous to the convenience base prevalent in rear facing only infant seats where the caregiver can better access the installation features of the base without the infant carrier in the way.

Once the decision to remove the shell from the base for installation had been made, that opened design options for additional features and benefits that were added to further improved the ability to install the child restraint in the vehicle.

One of the primary misuses of child restraints is a loose vehicle belt or lower anchor system. To address this, Evenflo designed a strong-arm feature similar to that employed in Evenflo infant seats that both adds tension to the webbing during the installation of the child restraint into the vehicle and locks the belt reducing potential for it to loosen over time. The mechanical advantage of the strong arm reduces the effort by caregivers, especially those with age or physical disabilities, to get a tight installation. This would be more difficult and complicated if the shell were not removable from the base, because the ability to remove the shell greatly simplifies accessibility of the attachment apparatus for consumers.

Studies consistently show that tether utilization generally hovers just above 50% for most forward-facing child restraint systems. In Evenflo's experience, low tether usage occurs at least in part because caregivers often buy a convertible seat while their child is still rear facing and they generally do not have the option to use the tether in that mode in most designs in the market. When they move the child restraint system to the forward-facing position, they often do not install the tether. To address this misuse, Evenflo found that being able to remove the shell from the base enabled relocating the tether anchor from

its traditional location on the upper back of the shell to the upper part of the base. This design resulted in an additional benefit of enabling tether use for both rear-facing and forward-facing modes of use. Based on feedback from caregivers and the NDCF data cited below, Evenflo believes that if caregivers can install the tether during the first installation when the child is rear facing it improves tether compliance and that is a benefit to safety. Tether use has been shown to reduce risk of head contact in the vehicle in frontal crashes and stabilizes the seat in oblique and lateral crashes.

Other features and characteristics of this rotating design also enhance the ease of installation and improve safety for children using the child restraint system. Feedback from consumers indicates that the ability to rotate the shell makes it easier for all caregivers and especially those with disabilities to install their child in the child restraint system. When the shell is in the lateral orientation (i.e., facing the caregiver who is outside the vehicle), it is much easier to apply force to activate the central front adjuster. This reduces loose harness misuse and improves safety. The no-rethread harness allows easier adjustment to the proper harness height. This is important for safety, but it also allows caregivers with multiple children to properly use the same child restraint system for children of different sizes. They can easily raise or lower the headrest/harness height and easily rotate either forward or rear facing depending on which child is using the child restraint system.

Evenflo participates in the National Digital Check Form (“NDCF”) program funded by NHTSA to better track seat check data across the US. The NDCF data assesses installations in terms of the following five use conditions:

- correct harness use
- correct direction of CRS, according to manufacturer's instructions
- correct recline angle
- correct use of lower anchors OR seatbelt
- correct use of tether

When comparing the Revolve360 to three other Evenflo convertible seat platforms (SureRide/Titan 65, Sonus/Sonus 65 and All in One (EveryKid/EveryFit/All4One)) with more traditional product use features,

we have preliminarily determined that the use of the Revolve significantly increases the odds of obtaining a satisfactory result on at least four of the five factors.

An analysis of tether misuse reduction was also done using NDCF data and the preliminary result shows that Revolve seats are approximately 6.5 times more likely to have the tether installed correctly compared to the other comparable seats.

These findings represent a significant reduction in misuse risk for caregivers using a Revolve360 child restraint system compared with other products. Evenflo believes that these findings will translate to improved safety for these types of products. More extensive analysis of these data is in process and Evenflo will supplement this response with that analysis when the review is completed.

Since launching in 2020, the Revolve360 product has received multiple innovation and design awards. There are many consumer testimonials to the benefits of the product and efficacy in real world crashes.

- **368 Revolve Slim**

In 2021 Evenflo began developing a convertible variant of the Revolve360. The design is very similar, and the function is the same except it does not have a booster mode of use. The benefits to the reduction of misuse are the same.

- **384 Revolve Extend**

In 2022 Evenflo expanded the rear facing use of the original Revolve360 product to 50lbs. The use and function remained the same as the original Revolve. The design and components were made common for production reasons in Q2 of 2024.

c) **Request For Production**

The materials constituting written and transcribed communications regarding the certification, specifications, and requirements of the product including, but not limited to the design, labeling, and

printed instructions for use will be produced contemporaneously with this response, and were identified by the search procedure detailed in Exhibit C.

Request No. 4:

Labeling on the detachable base of the Revolve360 states: "Do not install or use child restraint in vehicle without base."

- a. Explain what device constitutes the "child restraint" as used in this statement.
- b. State the reason(s) for this statement.
- c. For rear-facing, forward-facing and high back booster use modes, state separately for each mode whether Evenflo performed any tests, computer simulations or analysis, or other analyses without the use of the detachable base.
- d. Provide the results and any conclusions made by Evenflo relating to all means of evaluating the tests, computer simulations or analysis, or other analyses stated in 4c, regardless of the outcome or conclusions drawn.

Response:

- a. The "child restraint" as used in this statement means the child restraint system, including the shell and the base. This applies to each labelled individual Resolve Family Product
- b. The statement constitutes a warning reflecting that the Revolve Family Products were designed, sold, and certified as a single child restraint system and that use of the shell or base without the other component of the system could be unsafe.
- c. Evenflo did not conduct any tests, computer simulations or analysis of the Evenflo Family Products in which the detachable base was not utilized.
- d. Not applicable.

Request No. 5:

Separately, for all identical or substantially similar products:

- a. List each and every date on which any labeling was revised since the product's initial production.
- b. For each date listed in 5a, state whether any labeling affixed to the product includes any statement(s) advising against use "without base." If responding in the affirmative, explain your reason(s) for including the statement(s).
- c. For each date listed in 5a, produce a copy or an image of each label affixed to the product. Label each copy or image with the corresponding revision date listed in (a).
- d. For rear-facing, forward-facing and high back booster use modes as applicable, state separately for each mode whether Evenflo performed any tests, computer simulations or analysis, or other analyses for evaluating the compliance of the product without the use of its detachable base.
- e. Provide the results and any conclusions corresponding to all means of evaluating compliance stated in 5d, regardless of the outcome or conclusions drawn.

Response:

- a. Exhibit D list charts summarizing revisions to the product labelling of various types for each of the Revolve Family Products since initial production, including whether such labelling included a statement with substance addressed by subparagraph (b) and other relevant information. Due to their volume and granularity, these charts are produced as separate files in Evenflo's production.
- b. For each label included in Exhibit D which contains a statement advising against use "without base" (or words to that effect), the reason for including that statement is set forth in response to question 4(b) above.
- c. The materials responsive to Request 5(c) will be produced contemporaneously with this response.
- d. Evenflo did not perform any tests, computer simulations or analysis, or other analyses for evaluating the compliance of the product without the use of its detachable base in any use mode.
- e. Not applicable.

Request No 6:

Paragraph S5.9(a), “[a]ttachment to child restraint anchorage system,” of Standard 213 states that “in the case of rear-facing child restraints with detachable bases, only the base is required to have the components.” Separately, for the Revolve360 and all identical or substantially similar products, state whether Evenflo believes this statement in S5.9(a) applies to the product. If responding in the affirmative:

- a. State your reasons for that belief and the conditions under which you base that belief.
- b. Explain how this statement in S5.9(a) applies to the product when used in forward-facing mode.
- c. Explain how this statement in S5.9(a) applies to the product when used in high back booster mode.

Response:

Yes, the referenced statement in S5.9(a) of FMVSS No. 213 applies to the Revolve Family Products when they are being used in the rear-facing mode; however, the regulatory history of the referenced statement makes clear that it was intended to address infant restraint products with bases that were capable of being installed in motor vehicles without their bases, which the Revolve Family Products are not. S5.9(a) does not state that detachable bases are available only for rear-facing infant child restraint systems, nor does it provide that convertible child restraint systems with forward-facing modes must have child restraint anchorage system attachments on the seat shell instead of the detachable base.

S5.9(a) was originally adopted in March 1999, and provided that each add-on child restraint system “shall have components permanently attached to the system” that enable attachment to the vehicle’s child restraint anchorage system. 64 Fed. Reg. 10786, 10816 (March 5, 1999). The preamble to that final rule discussed public comments asking whether infant-only restraints with detachable bases would require anchorage attachment hardware on both the infant seat/carrier and on the base. NHTSA decided that the rule would not require both the infant seat/carrier and the base to be equipped with the anchorage hardware, notwithstanding the fact that the infant seat/carrier might be usable in a motor vehicle by itself without a base. 64 Fed. Reg. at 10807. However, the rule text did not include any

language addressing this decision, nor did the preamble to the rule address child restraint systems with seat shells and bases that are designed only to be installed together in a motor vehicle.

The exact language in S5.9(a) that refers to “rear-facing child restraints with detachable bases” was added to FMVSS No. 213 in August 1999 in response to petitions for reconsideration of the March 1999 final rule. The August Final Rule explained that it was correcting the text of S5.9(a) to specify that for rear-facing child restraints with detachable bases, only the base need have the permanently attached anchorage system components “as opposed to requiring the components on both the base *and the restraint system* itself.” (Emphasis added.) 64 Fed. Reg 47566, 47580 (August 31, 1999).

In context, both the March 1999 Final Rule (which discussed the possible installation of an infant seat/carrier in a motor vehicle without a base) and the August 1999 Final Rule (which referred to the infant seat/carrier as “the restraint system itself”) were addressing an infant “seat/carrier” which constitutes the “child restraint system” as defined in FMVSS No. 213. In other words, the 1999 rulemaking was addressing a configuration in which the infant seat/carrier could be installed in a motor vehicle as a child restraint system by itself without its base, but NHTSA nevertheless authorized the installation of the anchorage hardware only on the detachable base of such products. The 1999 rulemaking did not address or discuss child restraint systems such as the Revolve Family Products that are not designed for use in a motor vehicle without installing both the shell and base components.

a. Evenflo designed and certified the Revolve Family Products as “child restraint systems” as defined in FMVSS No. 213. FMVSS No. 213 defines “child restraint system” as “any device, except Type 1 or Type II seat belts, designed for use in a motor vehicle ... to restrain, seat, or position children who weigh 36 kilograms or less.” Each of the Revolve Family Products is a system comprised of a “seat shell” and a “detachable base,” which were designed to be used together in a motor vehicle as a single device, or system, to restrain, seat or position children. Evenflo notes that the term “seat shell” is not

used in FMVSS No. 213, but is widely understood in the industry to mean the structural element of a child restraint system that provides the shape and form for positioning a child in the child restraint system, which, in these Revolve Family Products, is intended to be attached to the vehicle together with, and by means of, the base. Evenflo did not design either the seat shell or the base to be used separately “to restrain, seat or position children” in the motor vehicle, so therefore neither component is a “child restraint system” by itself.

FMVSS No. 213 recognizes detachable bases and does not restrict the use of detachable bases to any particular types of child restraint systems. For example, S5.5.1 requires permanent labels on each “child restraint system” with information specified in S5.5.2(a) through (m). S5.5.2(l) requires (among other things) an installation diagram showing the child restraint system installed with a continuous loop lap/shoulder belt (S5.5.2(l)(1)) and only a lap belt (S5.5.2(l)(2)). For child restraints with a detachable base, S5.5.3 requires the “installation diagrams specified in S5.5.2(l) to be “visible only when the base alone is installed.” This requirement confirms that the detachable base is part of the child restraint system; otherwise, there would be no predicate for this rule to require the S5.5.2 diagrams to be present on that base. And nothing in the text of S5.5.1 or 5.5.2 limits the detachable base to rear-facing child restraint systems or any other type of child restraint system.

- b. S5.9(a) is not relevant to the Revolve Family Products when they are used in the forward-facing mode.
- c. S5.9(a) is not relevant to the Revolve Family Products when they are used in the booster mode.

Request No. 7.

Information submitted to NHTSA by Evenflo on March 1, 2023, identified six field incidents in which what Evenflo terms in its printed instructions as the “shell” of the Revolve360 separated from the detachable base during a crash. NHTSA was also subsequently made aware of an additional field incident through a VOQ and reporting by Evenflo under 49 C.F.R. Part 579. Identify any additional field incidents of which Evenflo is aware where the shell of the Revolve360 separated from the detachable base in a crash or other scenario. For each incident identified, provide a copy of any incident report (if there is

none, so state), complaint, or other available documentation. Your response should also specify the source of the report (owner, internet comment, etc.) to the extent not evident from the documentation provided.

Response:

Attached at Exhibit E is a chart summarizing all reports of field incidents of which Evenflo is aware in which it was indicated that a detachment of base from shell occurred in a Revolve Family Product in connection with a crash or other scenario. Documents associated with each incident are produced contemporaneously with this response. Such documents include the source of the report in each instance.

Evenflo has performed investigation in an effort to identify the cause of these incidents. None of the physical samples which Evenflo has examined exhibit any evidence that the shell was locked in position at the time of the incident, and witness marks would be visible if connecting components broke or the connection between shell and based were forced in some manner due to the force of crash. Evenflo is aware of no evidence suggesting that a detachment will occur if the product is installed and used as set forth in the instructions.

Evenflo has concluded that the detachments are explained by one of two causes. In most instances (and particularly those where the seat was unoccupied), it appears likely that the shell was not in the locked position (facing directly forward or rearward), such that it was possible for the shell to swivel to a release position. This likely reflects that consumers place a lesser priority on properly latching the seat when it is not occupied by a child. In one instance, the reporting consumer expressly confirmed that the shell was not in locked position.

There are, however, several incidents where the base was reported to have detached other than in a crash and in circumstances where very little force acted upon the shell. Evenflo has concluded that such incidents can only occur if the shell was, in fact, not engaged with the base. Evenflo has further theorized that this could reflect a fact pattern where a consumer sought to attach the base to the shell while the shell

in forward facing mode while it was in a reclined position (contrary to what the instructions direct). While it is difficult to attach the shell to the base in this configuration (and impossible to do so properly), experimentation establishes that it is not impossible to accomplish a level of partial engagement between the two components, in which the shell is not truly affixed to the base. Several scenarios by which a customer might do this is illustrated in the demonstration video Evenflo has produced contemporaneously with this response. Importantly, in such a scenario, the lack of a proper attachment is obvious (the seat wobbles markedly and it is clearly not firmly or properly attached to the base).

Request No. 8:

For all identical or substantially similar products, identify all field incidents of which Evenflo is aware where the shell separated from the detachable base in a crash or other scenario. For each incident identified, state the model designation or other designation used by you, and provide a copy of any incident report (if there is none, so state), complaint, or other available documentation. Your response should also specify the source of the report (owner, internet comment, etc.) to the extent not evident from the documentation provided.

Response:

The information requested in Request No. 8 is included in the Exhibit E and the documents and information contained in the response to Request 7 above, which addresses reports relating to all the Revolve Family Products.

Request No. 9:

Identify and list all modifications or changes to the design, labeling, or printed instructions of the Revolve360, and to all identical or substantially similar products since their initial introduction to the market that may relate to the attachment or release of the detachable base.

- a. For each modification or change, provide:
 - i. a detailed description of the modification or change;
 - ii. the reason(s) for the modification or change; and
 - iii. the date on which the modification or change was incorporated into production.

Page Includes Information for which Confidential Treatment is Sought - 49 CFR 512

- b. Describe whether any identified modifications or changes were made available as a service component, and whether any modified component(s) can be interchanged with earlier production components.

Response:

As it pertains to design changes, the information requested in Request No. 9 is listed in Exhibit F attached hereto. Information regarding changes to labelling and instructions is provided in the response to Request No. 5 above. Except for changes in the instructions, none of these changes was available as a service component.

Request No. 10:

State by brand and model designation all identical or substantially similar products you plan to introduce in the six months following the date of this Special Order.

Response:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RESPECTFULLY SUBMITTED

EVENFLO COMPANY, INC.



By: _____

Lawrence S. Buonomo
Vice President, Secretary and General
Counsel

CERTIFICATION

I, Lawrence S. Buonomo, here declare under the penalties of perjury that I am an officer of Evenflo Company, Inc., that the foregoing responses were prepared by me or under my supervision, that I have caused the documents of Evenflo to be searched diligently for information and documents responsive to this Special Order, and that the answers to the individual requests of the Special order respond and the documents produced or to be produced respond completely and correctly to the Special Order to the best of my information and belief.

A handwritten signature in cursive script, appearing to read "Law S. Buonomo", written in black ink.

Lawrence S. Buonomo

Exhibit A – Models

Request 1 Provide the name, model number, and a complete description of any product certified as complying with FMVSS No. 213 and manufactured, imported, delivered, offered for sale, or sold in the United States by you that has rear-facing and forward-facing use modes and a detachable base, including but not limited to the Revolve360, Revolve360 Slim, and Revolve360 Extend.		Request 1a Of the products identified, state which products rely on a detachable base for vehicle installation.	Request 1b For each product that relies on a detachable base for vehicle installation, state its use mode(s) and each means of installation on which it relies under FMVSS No. 213 55.3.2: Type 1 seat belt assembly only; child restraint anchorage system only; and Type 1 seat belt assembly plus a tether anchorage only (if needed to comply with S6.1).		
Req #1 - Model No.	Req #1 - Model Description	1a-base required for installation	1b-Rear-facing	1b-Forward-facing	1b-Booster Mode
35312310	GOLD REVOLVE360 ONYX	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 2
35312310AZ	GOLD REVOLVE360 ONYX	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 2
35312311	GOLD REVOLVE360 MOONSTONE	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 2
35312311A	GOLD REVOLVE360 MOONSTONE	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 2
35312311AZ	GOLD REVOLVE360 MOONSTONE	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 2
35312311S5	GOLD REVOLVE360 MOONSTONE SEED	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 2
35312312	GOLD REVOLVE360 SAPPHIRE	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 2
35312312AZ	GOLD REVOLVE360 SAPPHIRE	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 2
35312337	GOLD REVOLVE360 OPAL	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 2
35312337AZ	GOLD REVOLVE360 OPAL	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 2
35312457A	REVOLVE360 AINSLEY	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 2
35322405	REVOLVE360 AMHERST	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 2
35322405A	REVOLVE360 AMHERST	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 2
36812449	GOLD REVOLVE360 SLIM PEARL	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812450	GOLD REVOLVE360 SLIM OBSIDIAN	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812450AZ	GOLD REVOLVE360 SLIM OBSIDIAN	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812450POP	GOLD REVOLVE360 SLIM OBSIDIAN	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812451	GOLD REVOLVE360 SLIM AMETHYST	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812467	REVOLVE360 SLIM SALEM	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812467AZ	REVOLVE360 SLIM SALEM	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812468	REVOLVE360 SLIM STOW	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812468AZ	REVOLVE360 SLIM STOW	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812469	REVOLVE360 SLIM SUTTON	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812469AZ	REVOLVE360 SLIM SUTTON	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812470	REVOLVE360 SLIM CANTON	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812470A	REVOLVE360 SLIM CANTON	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812471	REVOLVE360 SLIM CARVER	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812501A	REVOLVE360 SLIM CAMBRIDGE	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812504	GOLD REVOLVE360 SLIM PERIDOT	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A

Request 1 Provide the name, model number, and a complete description of any product certified as complying with FMVSS No. 213 and manufactured, imported, delivered, offered for sale, or sold in the United States by you that has rear-facing and forward-facing use modes and a detachable base, including but not limited to the Revolve360, Revolve360 Slim, and Revolve360 Extend.		Request 1a Of the products identified, state which products rely on a detachable base for vehicle installation.	Request 1b For each product that relies on a detachable base for vehicle installation, state its use mode(s) and each means of installation on which it relies under FMVSS No. 213 SS 3.2: Type 1 seat belt assembly only; child restraint anchorage system only; and Type 1 seat belt assembly plus a tether anchorage only (if needed to comply with S6.1)		
Req #1 - Model No.	Req #1 - Model Description	1a-base required for installation	1b-Rear-facing	1b-Forward-facing	1b-Booster Mode
36812449	GOLD REVOLVE360 SLIM PEARL	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812450	GOLD REVOLVE360 SLIM OBSIDIAN	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812450AZ	GOLD REVOLVE360 SLIM OBSIDIAN	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812450POP	GOLD REVOLVE360 SLIM OBSIDIAN	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812451	GOLD REVOLVE360 SLIM AMETHYST	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812467	REVOLVE360 SLIM SALEM	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812467AZ	REVOLVE360 SLIM SALEM	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812468	REVOLVE360 SLIM STOW	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812468AZ	REVOLVE360 SLIM STOW	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812469	REVOLVE360 SLIM SUTTON	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812469AZ	REVOLVE360 SLIM SUTTON	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812470	REVOLVE360 SLIM CANTON	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812470A	REVOLVE360 SLIM CANTON	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812471	REVOLVE360 SLIM CARVER	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812501A	REVOLVE360 SLIM CAMBRIDGE	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A
36812504	GOLD REVOLVE360 SLIM PERIDOT	Yes	Type 1; Type 1 plus Tether; child restraint anchorage system	Type 1; Type 1 plus Tether; child restraint anchorage system	N/A

Exhibit B – Tests and Analyses



Model 353 Revolve
360 Compliance.xlsx



Model 368 Revolve
Slim Compliance.xlsx



Model 384 Revolve
Extend Compliance.xls

Exhibit C – Search Methodology – Certification Related Communications

To identify and produce the materials requested in Request No. 3 of the Special Order, Evenflo implemented the following process:

- Evenflo identify and search locations and materials specific identifiable to the Revolve Family Products and reviewed them for materials responsive to the request.
- Evenflo identified current and former employees who, by virtue of their job responsibility, were reasonably likely to have been party to communications responsive to the request. These included:

<u>Name</u>	<u>Function</u>	<u>Status</u>
[REDACTED]	Chief Product Officer	Active
[REDACTED]	AVP Child Safety	Active
[REDACTED]	Assoc Dir Child Safety	Active
[REDACTED]	Director Engineering	Active
[REDACTED]	Lead Product Engineer	Active
[REDACTED]	Product Manager	Former Employee
[REDACTED]	Advanced Engineering CTP	Active with affiliate
[REDACTED]	SVP Design	Active
[REDACTED]	Lead Product Engineer	Former Employee
[REDACTED]	Product Management	Active

*Page Includes Information for
which Confidential Treatment
is Sought - 49 CFR 512*

[REDACTED]	Product Engineer	Former Employee
[REDACTED]		Contractor
[REDACTED]	Softgoods	Former Employee
[REDACTED]	Sr Fashion Designer	Active
[REDACTED]	Packaging Engineer	Active
[REDACTED]	Quality	Former Employee
[REDACTED]	Project Management Plant	Active
[REDACTED]	Quality Engineer	Former Employee
[REDACTED]	Procurement	Former Employee
[REDACTED]	Product Management	Active
[REDACTED]	Product Marketing	Active
[REDACTED]	Sales	Former Employee
[REDACTED]	Tech Pub Writer	Active with Affiliate
[REDACTED]	Tech Pub Writer	Active
[REDACTED]	Tech Pub Writer	Former Employee
[REDACTED]	Testing	Former Employee
[REDACTED]	Brand Manager	Former Employee
[REDACTED]	Engineer	Former Employee
[REDACTED]	Tooling Engineering	Active

*Page Includes Information for
which Confidential Treatment
is Sought - 49 CFR 512*

[REDACTED]	Digital Marketing	Former Employee
[REDACTED]	Quality	Active
[REDACTED]	Quality	Active
[REDACTED]	Quality	Active

- Evenflo screened the available electronic communications for these custodians for the period January 1, 2019 through April 19, 2024¹ using the following search methodology:
 - To identify the product: "Revolv!" or [REDACTED]²
 - To identify the subject matter: "FMVSS" OR "213" OR "certificat*" OR "compliance" OR "CALSPAN" OR "Veridian" OR "MGA" OR "NHTSA" OR "dynamic" OR "5.1" OR "5.3" OR "installation" OR "5.4" OR "5.5" OR "Label*" OR "5.6" OR "instruction*" OR "5.7" OR "flammab*" OR "5.8" OR "require!" OR "registrat*" OR "5.9" OR "attachm*" OR "anchorage system" OR "latch" OR "anchor*" OR "connector*" OR ("test" w/5 "compli*" OR "qualif*" OR "certificat*") OR "spec" OR "specification" OR "homolog*"
- The output from these searches was then reviewed for materials responsive to the request.

¹ This encompasses the entire period of the development and product of the Revolve Family Products through the date of the Special Order.

² [REDACTED] and [REDACTED] were internal code names describing the projects for development of the Revolve Family Products, prior to selection of the name "Revolve360." [REDACTED] were the project numbers associated with [REDACTED] and [REDACTED] respectively.

Exhibit D – Labelling Summary

-  Request No5-Exhibit D
 -  Request No5-Exhibit D-Drop In
 -  Request No5-Exhibit D-Instructions
 -  Request No5-Exhibit D-Label-Air Bag Warning
 -  Request No5-Exhibit D-Label-Certification-Warning
 -  Request No5-Exhibit D-Label-Date-Model
 -  Request No5-Exhibit D-Label-Installation
 -  Request No5-Exhibit D-Label-Mode of Use
 -  Request No5-Exhibit D-Label-POP
 -  Request No5-Exhibit D-Label-Recline
 -  Request No5-Exhibit D-Registration Card
-

Exhibit E – Reported Detachment Incidents



Exhibit E - Reported
Detachments Incident

Exhibit F – Design Changes

[REDACTED]