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

January 30, 2025

Bruce York
Chief Vehicle Defects Division - B
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

RE: Nuna Baby Essentials, Inc.'s Response to Information Request ID PE24-026

Dear Mr. York,

On behalf of Nuna Baby Essentials, Inc. ("Nuna"), and pursuant to the relief granted by the National Highway Traffic Safety Administration ("NHTSA") on January 16, 2025, please find below Nuna's responses to questions 1, 2, 5 and 6 of NHTSA's Information Request letter, ID PE24-026.

1. State, by model and production year, the number of subject and peer child seats Nuna has manufactured for sale or lease in the United States. Separately, for each subject and peer child seat 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 on 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 child seat was originally sold or leased, or delivered for sale or lease (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:

Please find included with Nuna's submission an accompanying file marked as "No. 1 PRODUCTION DATA". The data spreadsheet contains three separate tabs labeled "Subject Equipment: Rava 2020-2022", "Peer Equipment: 2020-2023 Exec car seat", and "2023 Rava car seat". Each tab provides the following: model number, model name, production years, and production quantities per year. Additionally, Nuna provided the date range manufacture range for each model number.



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 and peer equipment:

   a. Consumer complaints, including those from fleet operators;

   b. Field reports, including dealer field 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 Child seat 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:



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;

[1] As stated in Response 1, the Peer equipment "2023 Nuna Rava Child Seat" data requested in this response contains original design Rava and very limited refresh Rava design data.

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.

Nuna's Response to Request No. 3:

No response required at this time.

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:

No response required at this time.

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 and peer child seats: 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 or customer satisfaction campaign.

   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. Problem code(s);

i. Replacement part number(s) and description(s);

j. Concern stated by customer;

k. Cause as stated on the repair order or similar document;

l. Correction as stated on the repair order or similar document; and

m. 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 an accompanying file marked "No 5 DATA PLUS WARRANTY". Within this file there are 3 tabs separately listing the subject and peer equipment. Nuna is providing all the information requested in a combined report with the following fields:



[redacted]

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, problem codes, part numbers and any other pertinent parameters used.

Nuna's Response to Request No. 6:

The search methods for subject and peer equipment are as previously stated in Nuna's June 20, 2023, response to DP24-003 request number 6.

7. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions, applicable to the alleged defect in the subject and peer child seats. State whether the problem codes are automatically reported to the warranty database electronically or manually entered into the warranty database by a claims administrator.

Nuna's Response to Request No. 7:

No response required at this time.

8. State, by model and production year, the terms of the new equipment warranty coverage offered by Nuna on the subject and peer 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 and peer 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. 8:

No response required at this time.

9. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject and peer equipment, that Nuna has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include

the latest draft copy of any communication that Nuna is planning to issue within the next 120 days.

Nuna's Response to Request No. 9:

No response required at this time.

10. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject and peer equipment that have been conducted, are being conducted, are planned, or are being planned by, or for, Nuna. For each such action, provide the following information:

    a. Action title or identifier;

    b. The actual or planned start date;

    c. The actual or expected end date;

    d. Brief summary of the subject and objective of the action;

    e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and

    f. A brief summary of the findings and/or conclusions resulting from the action.

    For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

Nuna's Response to Request No. 10:

No response required at this time.

11. Describe all modifications or changes made by, or on behalf of, Nuna in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject and peer equipment. For each such modification or change, provide the following information:

    a. The date or approximate date on which the modification or change was incorporated into equipment production;

    b. The subject or peer equipment the component is installed in;

    c. A detailed description of the modification or change;

d. The reason(s) for the modification or change;

e. The part number(s) (service and engineering) of the original component;

f. The part number(s) (service and engineering) of the modified component;

g. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;

h. When the modified component was made available as a service component; and

i. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Nuna is aware of which may be incorporated into equipment production within the next 120 days.

Nuna's Response to Request No. 11:

No response required at this time.

12. State the number of each of the following that Nuna has sold that may be used in the subject and peer equipment by component name, part number (both service and engineering/production), model and production year of the equipment which it is used and month/year of sale (including the cut-off date for sales, if applicable):

a. Subject component; and

b. Any kits that have been released, or developed, by Nuna for use in service repairs to the subject component/assembly.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and production year, any other equipment of which Nuna is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

Nuna's Response to Request No. 12:

No response required at this time.

13. Furnish Nuna's assessment of the alleged defect in the subject equipment, including:

a. The causal or contributory factor(s);

b. The failure mechanism(s);

c. The failure mode(s);

d. The risk to safety that it poses; and

e. What warnings, if any, the operator and the other persons would have that the alleged defect was occurring, or subject component was malfunctioning; and

f. The reports included with this inquiry.

Nuna's Response to Request No. 13:

No response required at this time.