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By Recall Mgt Div. at 9:06 am, Jul 26, 2010

July 23, 2010

10C-003
(6 pages)

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Report 573 for Safety-related Defect in CYBEX Belt-positioning Booster Seat

Dear Sir or Madam,

CYBEX Industrial, Ltd. (CYBEX) and Regal Lager, Inc. (Regal Lager), North American distributor of CYBEX products, have decided that a defect that relates to motor vehicle safety exists in certain CYBEX Solution X-fix boosters (model numbers beginning 0500200 and 0500760) with a warning related to securing an unoccupied booster which is inconsistent with CYBEX recommended practices. If a caregiver follows the warning as-written, in a severe crash, there is an increased risk that the booster could strike a vehicle occupant and cause injury. As such, CYBEX and Regal Lager will conduct a voluntary recall to correct the warning statements under Regal Lager Recall No. 2010-01

No deaths or injuries have been reported.

573.6(c)2 Affected boosters are the CYBEX Solution X-fix boosters (model numbers beginning 0500200 and 0500760) produced 02/2010.

573.6(c)3 The quantities of affected boosters follow:

Item	Model Numbers	Units Produced	Units Sold
CYBEX Solution X-fix Comfort Fabric	0500200XX	1302	654
CYBEX Solution X-fix Suede Fabric	0500760YY	660	227

573.6(c)4 CYBEX anticipates that 100% of the boosters produced with these model numbers are affected.

Affected units were produced in date ranges as indicated in the table below:

Item	Model Numbers	Dates of Manufacture
CYBEX Solution X-fix Comfort Fabric	0500200XX	02/2010
CYBEX Solution X-fix Suede Fabric	0500760YY	02/2010

573.6(c)5 During an internal audit, CYBEX discovered that the referenced boosters were produced with incorrect warnings on the headrest warning labels and in the owner's manuals. The warnings failed to incorporate the CYBEX corporate position on securing an unoccupied booster in a vehicle. CYBEX recommends always buckling the vehicle seat belt around an unoccupied booster to prevent it from becoming a loose object that could strike a vehicle occupant under heavy braking or in a sudden swerve or crash.

The warnings on the product labels state,

*"**NEVER** leave this booster seat unsecured in your vehicle. This booster seat must remain connected to the lower LATCH anchors in the vehicle, or secured by the vehicle's seat belt even when not in use."*

The warnings in the owner's manuals state,

*"**NEVER** leave this booster seat unsecured in your vehicle. This booster seat **MUST** remain connected to the lower LATCH anchors in the vehicle or secured by the vehicle's seat belt even when not in use. In a sharp turn, crash or sudden stop, an unsecured booster seat can be thrown around and could severely injure vehicle occupants."*

The correct warnings should state,

*"**NEVER** leave this booster seat unsecured in your vehicle. This booster seat must be secured by the vehicle's seat belt, even when not occupied."*

and

*"**NEVER** leave this booster seat unsecured in your vehicle. This booster seat **MUST** be secured by the vehicle's seat belt, even when not occupied. In a sharp turn, crash or sudden stop, an unsecured booster seat can be thrown around and could injure vehicle occupants."*

See ***Appendix A*** for copies of the incorrect and correct label.

573.6(c)6 There are no consumer complaints related to this matter and no incidents or injuries have been reported. It is a safety-related defect, as defined by regulations.

573.6(c)8i

Regal Lager discontinued shipment of the product on July 19, 2010, and will advise retailers of their obligation to discontinue distribution of the affected product on July 26, 2010. Copies of the retailer notification are included in **Appendix B.**

By August 10, 2010, Regal Lager will send a letter to all registered owners of the CYBEX Solution X-fix. In order to reach non-registered owners, notice will also be posted on the Regal Lager website at www.regallager.com, and press releases advising owners of the affected boosters to contact Regal Lager Customer Service at 1-800-593-5522.

A recall kit with a cover up label with the correct warning and replacement owner's manual will be shipped, free of charge, to all owners who registered their CYBEX booster. As well, Regal Lager will provide details on its website at http://www.regallager.com outlining the steps owners who have not yet registered need to take to receive a recall kit. Information will be made available to retailers to be placed in their retail locations and/or on their websites. Owners who subsequently register an affected booster will be mailed a recall kit.

Until the caregiver receives their recall kit, they may continue to use the booster occupied following the original instructions and unoccupied secured by the vehicle belt.

573.6(c)8ii

A letter will be sent to all registered owners on or before August 10, 2010, and to all retailers distributing the CYBEX Solution X-fix, as well as posted on the Regal Lager website (www.regallager.com).

The letter will notify caregivers of the issue and advise that the vehicle seat belt be buckled around the booster while it is unoccupied.

Draft copies of the notification letters are available under ***Appendix B***.

If further details are needed, or if you have any questions, do not hesitate to contact me at (678) 819 5800 or via email (bengt@regallager.com).

Respectfully submitted,

Bengt Lager
President
Regal Lager, Inc.

⚠ WARNING! ⚠ DEATH or SERIOUS INJURY can occur

- Use only with children who weigh between 33 and 100 pounds (15 and 45 kg), and whose height is between 38 and 60 inches (96 and 152 cm), and who are 3 years of age or older.
- Use only the vehicle's lap and shoulder belt system when restraining the child in this booster seat.
- Secure this child restraint with the vehicle belt, even when unoccupied.
- Follow all instructions on this child restraint and in the written instructions behind the Backrest.
- Register this child restraint with the manufacturer.
- Never use the Booster Base without the Backrest attached.
- Only place this booster seat in a vehicle seating location allowed by the vehicle manufacturer.
- Based on crash statistics, the rear seat is the safest location for a properly installed booster seat.
- Never leave an unsecured booster seat in your vehicle. This booster seat must be secured by the vehicle's seat belt, even when not occupied.

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⚠ WARNING! ⚠ DEATH or SERIOUS INJURY can occur

- **USE ONLY** with children who weigh between 33–100 lb (15–45 kg), and whose height is between 38–60 inches (96–152 cm), and who are 3 years of age or older.
- **USE ONLY** the vehicle's lap and shoulder belt system when restraining the child in this booster seat.
- **SECURE** this child restraint with the vehicle's child restraint anchorage system if available, or with a vehicle belt.
- **FOLLOW ALL** instructions on this child restraint and in the written instructions behind the seat backrest.
- **REGISTER** this child restraint with the manufacturer.
- **NEVER USE** the Booster Base without the Backrest attached.
- **ONLY PLACE** this booster seat in a vehicle seating location allowed by the vehicle manufacturer.
- The **REAR SEAT** as the safest location for a properly installed booster seat, based on crash statistics.
- **NEVER LEAVE** this booster seat unsecured in your vehicle. This booster seat must remain connected to the lower LATCH anchors in the vehicle, or secured by the vehicle's seat belt even when not in use.

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Regal+Lager

July 26, 2010

CYBEX Solution X-fix Replacement of Warning Label and Owner's Manual

Dear CYBEX Solution X-fix Retailer,

CYBEX has notified Regal Lager, Inc. that a defect, which relates to motor vehicle safety, exists in certain CYBEX Solution X-fix booster seats manufactured in February 2010. The defect consists of an incorrect warning statement related to securing an unoccupied booster seat. This statement is inconsistent with CYBEX recommended practices - always secure an unoccupied booster with the vehicle seat belt. If a caregiver follows the warning as written, there is an increased risk that the unoccupied booster seat could strike a vehicle occupant and cause injury in a severe crash. The incorrect warning statement appears in the Owner's Manual and on the headrest warning label.

The performance of the Solution X-fix booster seat is not affected when used with a child securely restrained in the seat. CYBEX recommends that to fully insure that the booster seat is properly restrained in a crash, **when unoccupied,** that it be belted in with the vehicle seat belt, even if the LATCH connectors are being used.

Owners of a Solution X-fix affected by this action will receive, free of charge, a correct warning label to apply over the existing label and a replacement Owner's Manual. The corrected label and replacement Owner's Manual will be mailed to all registered owners on or before August 10, 2010. Owners who have not registered their booster seats may obtain the replacement label and Owner's Manual, by visiting our website www.regallager.com/recalls or calling us at 800-593-5522 between 8:30 am and 5:30 pm EST/EDT.

According to our records, your retail establishment has sold Solution X-fix seats that are affected by this action. We kindly ask for your help with the following:

1. **PLEASE STOP SELLING THE PRODUCT**. Please remove the product from your store shelves and web sites until we have new labels and Owner's Manuals produced (about 10-14 days).
2. Count how many Solution X-fix seats you have in your inventory, including floor samples? Once we have this information, we will contact you directly or through your representative to arrange for new labels and Owner's Manuals to be sent to you for your on hand inventory. Please send your inventory count of Solution X-fix seats to Christian Baires, at christian@regallager.com, or fax them to Christian at 678-819-5832.
3. If you can identify consumers that have purchased a Solution X-fix from you, please provide us with their full contact information so we can send them letters with new labels and Owner's Manuals directly. Please send this contact information to Christian as well.

This information is not for public release at this time – please keep this confidential until you hear otherwise from us.

We truly apologize for this inconvenience and appreciate your help in keeping children and other occupants in a vehicle safe.

Sincerely yours,



Bengt Lager
President
Regal Lager, Inc.