



U.S. Department of Transportation  
**National Highway Traffic Safety  
Administration**

1200 New Jersey Avenue SE  
Washington, DC 20590

September 27, 2021

Doug Oaks  
President  
Combi USA, Inc.  
15050 Choate Cir  
Suite G  
Charlotte, NC 28273

NEF-107CL  
21C-001

**Subject:** Child Seat Webbing May Fail/FMVSS 213

Dear Doug Oaks:

This letter serves to acknowledge Combi USA, Inc.'s notification to the National Highway Traffic Safety Administration (NHTSA) of a safety recall which will be conducted pursuant to Federal law for the product(s) listed below. Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

**Makes/Models/Model Years:**

COMBI/BABYRIDE/9999

**Mfr's Report Date:** March 8, 2021

**NHTSA Campaign Number:** 21C-001

**Components:**

CHILD SEAT:HARNESS:FRONT ADJUSTER

CHILD SEAT:HARNESS:STRAP/WEBBING

**Potential Number of Units Affected:** 13,880

**Problem Description:**

Combi USA, Inc. (Combi) is recalling certain Combi BabyRide Infant Car Seats, model 378099 with dates of manufacture of 5/1/2016 thru 8/31/2019. The 1-inch-wide webbing strap used in the center front adjuster to adjust the shoulder harness straps fail the minimum initial breaking strength requirements, and in certain circumstances, may not adequately restrain a child during a crash. As such, these car seats fail to conform to Federal Motor Vehicle Safety Standard (FMVSS) number 213, "Child Restraint Systems."

**Consequence:**

A child that is not adequately restrained in a crash has an increased risk of injury.

**Remedy:**

The remedy for this recall is still under development. Combi has not yet provided a date for owner notifications. Owners may contact Combi customer service by emailing [customerservice@combiusa.com](mailto:customerservice@combiusa.com).

**Notes:**

Owners may also contact the National Highway Traffic Safety Administration Vehicle Safety Hotline at 1-888-327-4236 (TTY 1-800-424-9153), or go to [www.nhtsa.gov](http://www.nhtsa.gov).



Under 49 U.S.C. § 30112(a), it is illegal for anyone, including a manufacturer, distributor, dealer, or retailer to sell an item of equipment or vehicle that fails to comply with all applicable Federal motor vehicle safety standards.

We note that your report states that Combi USA, Inc. believes that this matter does not have a safety risk. In our view, this statement has no force or effect in terms of Combi USA Inc.'s obligation to undertake and complete the recall, and NHTSA does not agree with it.

Please be reminded of the following requirements:

**Please ensure the following requirements are met:**

Your company must supply the estimated date(s) for which it will notify owners regarding this safety recall. Please be reminded that all owners must be notified of the safety risk associated with this filing within 60 days of the 573 being submitted. If the remedy is not available at that time, mail the interim notice, following it with a second notice once the remedy becomes available. If your company subsequently becomes aware that either the beginning or the completion dates reported to the agency for any of the notifications will be delayed by more than two weeks, your company shall promptly advise the agency of the delay and the reasons therefor, and furnish a revised estimate. If there are no owners involved in this recall, please state so in the 573 (49 CFR 573.6 (c)(8)(ii)).

**AMENDED 573 REQUIRED.**

A description of the manufacturer's program for remedying the defect or noncompliance (49 CFR 573.6 (c)(8)(i)).

**AMENDED 573 REQUIRED.**

An identification and description of the risk to motor vehicle safety reasonably related to the defect or noncompliance (49 CFR 573.6 (c)(5)). All filings should state an increased risk of either a crash, injury or fire.

**AMENDED 573 REQUIRED.**

You are required to submit a draft owner notification letter to this office no less than five days prior to mailing it to the customers. Also, copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

Combi USA, Inc.'s contact for this recall will be Choon Lee who may be reached by email at [choon.lee@dot.gov](mailto:choon.lee@dot.gov). We look forward to working with you.

Sincerely,



Alex Ansley  
Chief, Recall Management Division  
Office of Defects Investigation  
Enforcement