

Part 573 Safety Recall Report

21C-001

Manufacturer Name : Combi USA, Inc.**Submission Date :** AUG 20, 2021**NHTSA Recall No. :** 21C-001**Manufacturer Recall No. :** Not applicable**Manufacturer Information :****Manufacturer Name :** Combi USA, Inc.**Address :** 15050 Choate Rd. Suite G
Charlotte NC 28273**Company phone :** 9809394585**Population :****Number of potentially involved :** 13,880**Estimated percentage with defect :** 100 %**Child Restraint Information :****Make 1 :** Combi USA**Model :** BabyRide**Seat Type :** REARFACING INFANT SEAT**Model No. :** 378099**Platform Name / No. :** NR**Brand Name :** NR**Descriptive Information :** Combi USA child restraint system. Model Name: BabyRide Infant Car Seat; Model No. 378099; Combi has determined that all 13, 880 units are involved in this noncompliance**Production Dates :** MAY 01, 2016 - AUG 31, 2019**Description of Noncompliance :****Description of the Noncompliance :** The 25 mm wide webbing used in the center front adjuster does not comply with the minimum initial breaking strength specified in FMVSS No. 213, S5.4.1.2(a).**FMVSS 1 :** 213 - Child restraint systems**FMVSS 2 :** NR**Description of the Safety Risk :** Combi does not believe that a safety risk is presented. Combi has reviewed the harness webbing specifications defined in FMVSS 213 and notes the following:
i. Harness webbing in FMVSS 213 is for webbing for children up to 80 lbs. The webbing is sufficiently strong to restrain an 80 lb. occupant forward facing.
ii. BabyRide car seat is an infant car seat used rear-facing only with infants 22 lbs. or less. Rear-facing car seats provide restraint of infant primarily by supporting infant's head and back on the seat back support surface of the

restraint. The loads carried by the seat back significantly reduce loads experienced by the harness webbing compared to a forward-facing restraint.

iii. Rear-facing use of the BabyRide with children 22 lbs. or less subject the harness and adjuster belts to only a small percentage of the load applied when forward-facing with occupants weighing 80 lbs.

1. In FMVSS 213 dynamic testing, Combi records indicate when tested with the 12-month ATD weighing 22 lbs. the total load applied to LATCH belt is 3989 N or vehicle lap belt is 4067 N. The 12-month CRABI ATD weight at 22 lbs. (10 kg) the maximum weight BabyRide is to be used with.

2. The total loads identified are from the car seat and weight of the ATD. During a rear-facing test, only a portion of that load is applied to the harness and adjuster belt as a significant portion of the load from the occupant is supported by the seat back of the car seat and a portion of the total load on the LATCH belt and vehicle belt is from the weight of the car seat itself which is not transferred to the harness belts.

3. Combi believes that the initial minimum breaking strength of 11,000 N is much higher than needed for rear-facing seats like BabyRide even when occupied with maximum weight. 4. Combi believes the breaking strength of webbing after abrasion is much higher than needed for rear-facing seats like the BabyRide even when occupied by a child.

Description of the Cause : The car seat was manufactured by a company in the business of manufacturing car seats for global markets. It has been reported that in 2016 Combi USA tested and approved pre-production samples. The assembly factory, harness manufacturer, and the webbing manufacturer were accountable for certifying compliance to FMVSS 213. However, in reviewing the production test reports for the webbing testing in response to a NHTSA information request, it was found that the webbing did not meet the minimum initial breaking strength of 11,000 N. Based on the production test reports and the NHTSA 2019 Compliance testing, Combi has determined that a noncompliance exists for the webbing initial breaking strength. Combi is submitting this 573 report within 5 working days of making that determination.

Identification of Any Warning that can Occur : None

Involved Components :

Component Name : webbing

Component Description : 25 mm wide webbing used in center front adjuster

Component Part Number : NR

Supplier Identification :

Component Manufacturer

Name : Remmert Spa
Address : 10077 San Maurizio C.se (TO)
Foreign States
Country : Italy

Chronology :

- i. Combi USA received an information request from NHTSA on 1/25/2021 regarding this potential webbing issue and has reviewed the deficiencies reported by NHTSA in DRAFT Test Report No. 4642921-018.
- ii. Combi initiated an internal investigation into the subject webbing including the actions listed below.
 - a. Combi has received and reviewed copies of production quality control testing conducted by REMMERT SPA on the subject 25 mm webbing that was used on the production of the BabyRide car seat between 2016 and 2019. Reports dated 1/13/2016, 2/17/2016, 8/03/2016, 10/20/2016, 2/27/2017, 6/19/2017, 8/02/2017, 6/10/2018, 7/12/2018, and 9/12/2019,
 - b. Combi has noted that the test results shown in the production quality control test reports from REMMERT SPA are consistent with the test results identified in the NHTSA DRAFT Test Report No.4642921-018 which ranges from 9,622 to 10,136 N.
 - c. Based on the test results received from the production quality control testing, Combi has confirmed that a noncompliance with the requirements of the regulation exists.

Description of Remedy :

Description of Remedy Program :	Combi is planning to provide owners with a webbing assembly to replace the webbing in the center front adjuster and provide instructions for removal and replacement of the webbing. This plan will be confirmed once compliance of the replacement webbing with FMVSS 213 is verified and the instruction for replacement have been finalized.
How Remedy Component Differs from Recalled Component :	To be determined.
Identify How/When Recall Condition was Corrected in Production :	The product is no longer in production. No change made to correct future production.

Recall Schedule :

Description of Recall Schedule :	Estimated recall schedule for notification and sending repair kits to owners will be determined after the remedy program is determined. This 573 report will be updated once the schedule is confirmed.
Planned Dealer Notification Date :	NR - NR
Planned Owner Notification Date :	NR - NR

Purchaser Information :

The following manufacturers purchased this defective/noncompliant equipment for possible use or installation in new motor vehicles or new items of motor vehicle equipment:

Name : NR

Address : NR

NR

Country : NR

Company Phone : NR

* NR - Not Reported