



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

1200 New Jersey Avenue SE  
Washington, DC 20590

March 10, 2021

Mr. Scott Spence  
Director – Product Development  
Combi USA, Inc.  
3520 Westinghouse Blvd.  
Suite B  
Charlotte, NC 28273

NEF-107CL  
21C-001

**Subject:** Harness Webbing Strength/FMVSS 213/Petition

Dear Mr. Spence:

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

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

**MFR's Report Date:** 3/5/2021

**Components:**  
CHILD SEAT: HARNESS: FRONT ADJUSTER

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

**Summary:**

Combi USA, Inc. (Combi) has notified NHTSA that certain BabyRide Rearfacing Infant Seats, model number 378099, fail to comply with the requirements of Federal Motor Vehicle Safety Standard number 213, "Child Restraint Systems." The 25-mm wide webbing used in the center front adjuster does not comply with the minimum initial breaking strength. Combi believes this noncompliance does not affect child restraint safety.

**Consequence:**

See Notes

**Remedy:**

See Notes

**Notes:**

The manufacturer is petitioning NHTSA for a determination that this matter is inconsequential to motor vehicle safety. The manufacturer is not obligated to conduct an owner notification and remedy campaign until NHTSA has resolved this petition. If the petition is denied, the manufacturer will be notified and must then undertake its notification and remedy campaign obligations.

Under 49 C.F.R. § 556, the manufacturer is required to submit their petition for exemption within **30 days**. This requirement is detailed in Part 556 found [here](#).

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.

Your contact for this recall will be Choon Lee who may be reached by phone at (202)366-0388, or 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