

Part 573 Safety Recall Report

22E-012

Manufacturer Name : Comoto Holdings, Inc.

Submission Date : APR 15, 2022

NHTSA Recall No. : 22E-012

Manufacturer Recall No. : NR



Manufacturer Information :

Manufacturer Name : Comoto Holdings, Inc.

Address : 4020 S 26th St

Philadelphia PA 19112

Company phone : 1-800-292-5343

Population :

Number of potentially involved : 1,704

Estimated percentage with defect : 5 %

Equipment Information :

Brand / Trade 1 : STREET & STEEL HELMET

Model : S&S RAIDER HELMET

Part No. : SSHR

Size : XS, MD, LG, 2XL

Function : Head Protection

Descriptive Information : A few helmets failed to comply during DOT testing

Production Dates : NOV 01, 2019 - OCT 31, 2021

Description of Noncompliance :

Description of the Noncompliance : Penetration test Failure & a 2nd impact dwell time test failure

FMVSS 1 : 218 - Motorcycle helmets

FMVSS 2 : NR

Description of the Safety Risk : Penetration Test Failure: Very rare safety risk;
2nd Impact dwell time test failure: not a safety risk. There is an increased risk of a rider suffering a head injury if the helmets were to fail

Description of the Cause : NR

Identification of Any Warning that can Occur : NR

Involved Components :

Component Name : NR

Component Description : NR

Component Part Number : NR

Supplier Identification :

Component Manufacturer

Name : Foshan City Nanhai Manufacturing Co Ltd

Address : Yannan Industrial Area

Longgao Road, Jiujiang Foshan City Foreign States

Country : China

Chronology :

10/21, Comoto notified that certain size Street & Steel Raider helmets manufactured in 2021 that were tested at ACT Lab USA were found to be noncompliant with FMVSS 218. The size XS Raider helmet failed the 2nd impact dwell time test with dwell times @200 g higher than 2.0 ms. Sizes L and XXL Raider helmets failed the penetration test. Comoto quarantined Raider helmets in inventory and began investigation into the cause of the failures. Comoto was surprised by the noncompliance because this model helmet passed the FMVSS 218 testing done at ACT Lab China.

Comoto reviewed test results for Raider helmets manufactured in 2019 and 2020 to confirm that all sizes tested by ACT Lab China were found to be compliant with FMVSS 218. Those indicated a slight difference in the weight of the helmet samples manufactured in 2019/2020 versus those manufactured in 2021. In 10/21, Comoto reported the test failures to the manufacturer of the helmets, Foshan City Nanhai Manufacturing Co Ltd, but did not receive a response until December 19, 2021, due to personnel turnover at YOHE.

Between 12/19/21 and 1/14/22, representatives of Comoto, Yohe, ACT Lab USA, and ACT Lab China investigated why the helmets passed at ACT Lab China, but failed at Act Lab USA. Reports, photos and videos were exchanged in an effort to determine whether the test failures were attributable to differences in the testing of the Raider helmets.

On 1/17/22, Comoto retained another independent, third-party test lab, Southern Impact Research Center, to test sizes M, L, XL, and XXL Raider helmets for compliance with FMVSS 218. 2/22, Comoto was notified that testing by Southern Impact resulted in a penetration failure for the medium size Raider helmet and one test failure for the 2nd impact dwell time test with a dwell time @200 g slightly higher than 2.0 ms with a 6.07 m/s impact velocity for the XXL size Raider helmet.

After reviewing the tests, Comoto decided to voluntarily initiate this recall.

Description of Remedy :

Description of Remedy Program : Will provide owners of the recalled helmets with either. 1) a replacement Street & Steel model helmet which complies with FMVSS218; or 2) other model helmet of equal or lesser value; or 3) a credit with an additional 10% discount;

How Remedy Component Differs from Recalled Component : Helmets manufactured in the last 3 years

Identify How/When Recall Condition was Corrected in Production : N/A

Recall Schedule :

Description of Recall Schedule : NR

Planned Dealer Notification Date : FEB 22, 2022 - FEB 22, 2022

Planned Owner Notification Date : APR 18, 2022 - APR 24, 2022

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