OMB Control No.: 2127-0004

Part 573 Safety Recall Report

23E-003

Manufacturer Name: Comoto Holdings, Inc.

Submission Date: JAN 13, 2023 NHTSA Recall No.: 23E-003 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: 18,980 Estimated percentage with defect: 5 %

Equipment Information:

Brand / Trade 1: BILT HELMET

Model: BILT ROUTE HELMET

Part No.: BLH100
Size: MD, XL, XXL
Function: Head Protection

Descriptive Information: A few helmets failed to comply during DOT testing. Penetration Test Failure.

Potential quantity involved 14,466

Production Dates: MAR 01, 2020 - JAN 01, 2022

Brand / Trade 2: BILT HELMET

Model: BILT ROUTE RETRO WOMENS HELMET

Part No.: BLH118
Size: MD, XL, XXL
Function: Head Protection

Descriptive Information: A few helmets failed to comply during DOT testing. Penetration Test Failure.

Potential quantity involved 1,829

Production Dates: MAR 01, 2020 - JAN 01, 2022

Brand / Trade 3: BILT HELMET

Model: BILT ROUTE JOURNEY

Part No.: BLH109 Size: MD, XL, XXL

Function: NR

Descriptive Information: A few helmets failed to comply during DOT testing. Penetration Test Failure.

Potential quantity involved 2,685

Production Dates: MAR 01, 2020 - JAN 01, 2022

Description of Noncompliance:

Description of the Penetration test Failure

Noncompliance:

FMVSS 1: 218 - Motorcycle helmets

FMVSS 2: NR

Description of the Safety Risk: Penetration test Failure: Very rare 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 NR

that can Occur:

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:

04/22 Comoto were notified that the sizes M, & XXL helmet manufactured in 2021 that were tested at ACT Lab USA were found to be noncompliant with FMVSS 218. 06/22 after discussion with the manufacturer, Foshan City Nanhai Manufacturing Co Ltd. Comoto submitted a further M size for compliance testing. ACT reported to COMOTO that this size had also failed the penetration tests. Comoto notified Foshan City Nanhai Manufacturing again of the failure and they started to do some investigation internally and in August they provided ACT Labs China with improved liners in the Route helmets. These all passed (XS, S, M, L, XL, XXL) The vendor then sent sizes S, M, L, XL, XXL to Comoto to submit for retesting at ACT Labs USA. We were notified in October that the three sizes M, XL, and XXL had failed to comply. Comoto was very surprised by the noncompliance because the model helmet had passed testing in ACT Lab China Oct, 2016, June, 2017, June 2018, December, 2018, May 2019, December, 2019. After reviewing all 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

BILT model helmet which complies with FMVSS218; or 2) other model

helmet of equal or lesser value 3) A Credit;

How Remedy Component Differs Helmets manufactured in the last 3 years

from Recalled Component:

Identify How/When Recall Condition N/A

was Corrected in Production:

Recall Schedule:

Description of Recall Schedule: Please note COMOTO has no dealer network

Planned Dealer Notification Date: JAN 13, 2023 - JAN 13, 2023 Planned Owner Notification Date: FEB 01, 2023 - MAR 01, 2023

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