Newell Rubbermaid
Brands That Matter

Baby & Parenting
Essentials

RECEIVED
By Recall Management Division at 6:39 am, Feb 10, 2014

February 7, 2014

VIA E-MAIL (RMD.ODI@DOT.GOV)

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division (NVS–215)
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Part 573 Report

Dear Ms. Lewis:

Graco Children's Products, Inc. submits this letter pursuant to 49 C.F.R. Part 573, to provide information relating to NHTSA's determination of a potential safety-related defect in the buckles used on certain child restraints. While Graco and NHTSA have not reached an accord over the nature or severity of this issue, in an abundance of caution Graco has agreed to submit this 573 report and engage in a recall.

49 C.F.R. § 573.6(c)(1): Manufacturer's name

The buckles at issue were fabricated by AmSafe Commercial Products, Inc., 22937 Gallatin Way, Elkhart, IN 46514. They were installed by Graco on child restraints and sold under the Graco Children's Products, Inc. brand name.

49 C.F.R. § 573.6(c)(2): Items of equipment

NHTSA determined through its investigation that Signature, QT, and QT3 harness buckles ("subject buckles") on Graco model year 2009-2013 child restraints may not unlatch.

These buckles were used on the following toddler and booster child restraints, for model years 2009-2013 ("subject child restraints"):

- Cozy Cline
- Comfort Sport
- Classic Ride 50
- My Ride 65
- My Ride with Safety Surround
- My Ride 70

- Size 4 Me 70
- Smartseat
- Nautilus
- Nautilus Elite
- Argos 70

The recall population excludes infant child restraints manufactured with the subject buckles.

49 C.F.R. § 573.6(c)(3): Total Number

The total number of Subject Child Restraints is 3,773,379.

49 C.F.R. § 573.6(c)(4): Percentage of Affected Equipment

Based on Graco's Consumer Services data, approximately 0.148% of the Subject Child Restraints have exhibited some degree of buckles being either difficult to unlatch or being stuck in the latched position.

49 C.F.R. § 573.6(c)(5): Description

Certain buckles that become contaminated with foreign material, such as food or dried liquids, that are not cleaned and maintained may become progressively difficult to unlatch or become stuck in the latched position. If this occurs, users may experience difficulty unlatching the buckle.

49 C.F.R. § 573.6(c)(6): Chronology

Graco has been monitoring the buckle performance on the **S**ubject **C**hild **R**estraints since 2009 and has provided consumers with cleaning and operation instructions or replacement buckles. On October 15, 2012, ODI initiated a Preliminary Evaluation PE12-031 after receiving Vehicle Owner Questionnaires. ODI upgraded the matter on February 21, 2013 to EA13-001. While Graco and NHTSA have not reached an accord over the nature or severity of this issue, as a result of NHTSA's investigation, Graco has agreed to submit this Part 573 Report in an abundance of caution.

49 C.F.R. § 573.6(c)(8): Manufacturer's Program for Remedy

While Graco and NHTSA have not reached an accord over the nature or severity of this issue, Graco in an abundance of caution has agreed to submit this 573 report and engage in a recall for the Subject Child Restraints.

* * *

Graco will submit the additional information required by Part 573 as it becomes available. If you have any questions, please do not hesitate to contact me at 770-418-7000 or sean.beckstrom@newellco.com. Thank you.

Sincerely,

Sean Beckstrom
Vice President, Legal Affairs
Newell Rubbermaid – Baby & Parenting Essentials

cc: David Galambos – Senior Regulatory Manager, Graco Children's Products, Inc.
Cheryl Falvey, Esq.