



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

1200 New Jersey Avenue SE  
Washington, DC 20590

June 20, 2013

Mr. Edward Whitaker  
Director of Quality and Regulatory  
Combi USA, Inc.  
3520 Westinghouse Blvd., Suite B  
Charlotte, NC 28273

NVS-215KS  
13C-002

**Subject:** Child Restraint Webbing/FMVSS 213/Petition

Dear Mr. Whitaker:

This letter serves to acknowledge Combi USA, Inc.'s notification to the National Highway Traffic Safety Administration (NHTSA) of a noncompliance with Federal Motor Vehicle Safety Standard No. 213, "Child Restraint Systems." Please review the following information to ensure that it conforms to your records. If the information does not agree with your records, please contact us immediately to discuss your concerns.

**Makes/Models/Model Years:**  
COMBI/8220 (COCCORO)/9999  
COMBI/8836 (ZEUS 360)/9999

**NHTSA Campaign Number:** 13C- 002

**Mfr's Report Date:** June 9, 2013

**Components:** CHILD SEAT

**Potential Number of Units Affected:** 14,039

**Summary:**

Combi USA, Inc. (Combi) has notified NHTSA that certain 8220 (Coccoro) and 8836 (Zeus 360) child restraints fail to comply with the requirements of Federal Motor Vehicle Safety Standard No. 213, "Child Restraint Systems." The harness webbing is noncompliant when it is subjected to the minimum breaking strength requirements.

**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 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 Kelly Schuler who may be reached by phone at (202) 366-5227, or by email at [kelly.schuler@dot.gov](mailto:kelly.schuler@dot.gov) or through the office email at [rmd.odi@dot.gov](mailto:rmd.odi@dot.gov). We look forward to working with you.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Timian". The signature is fluid and cursive, with the first name being more prominent.

Jennifer Timian  
Chief, Recall Management Division  
Office of Defects Investigation  
Enforcement