

13C-002 (2 pages)

Date: 6/09/2013

Mrs. Nancy L. Lewis Associate Administrator for Enforcement National Highway Traffic Safety Administration 1200 New Jersey Avenue, S.E. Washington, D.C. 20590

Subject: Preliminary Defect and Noncompliance Information Report

Reference: PE-213-130226A

Campaign Reference Number: To Be Assigned

This letter is pursuant to the requirements of Title 49 CFR Section 573.6 - Defect and noncompliance information report.

This report is a preliminary report and provides the information Combi USA, Inc. has available at the time this report is submitted. Additional information supplementing the report will be provided as the information becomes available.

Combi USA has decided to provide a 573 non-compliance report in response to the recent Department's letter of 5/23/13. Combi USA acknowledges that the testing conducted by NHTSA on harness webbing from Combi Coccoro (Model # 8220) child restraint demonstrates the existence of a noncompliance with FMVSS 213.

573.6 (c)(1)

The manufacturer's name: Combi USA, Inc.

3520 Westinghouse Blvd., Suite B

Charlotte, NC 28273

573.6 (c)(2) Equipment Type: Child Restraint:

Model # 8220,

Model name: Coccoro

Based on NHTSA Test Report No. 2383579-20 (Final Report 213-UST-11-20) conducted on August 24, 2011, the Coccoro passed all component testing. The date of manufacture of the items within the above test was Aug. 14, 2010 in which any subsequent production after this date of manufacture is affected up until the removal of the imbedded stop button from production. The imbedded stop button was removed from the Coccoro Convertible child restraint harness assembly on 1/29/2013. The previous production date was 12/5/2012.

Date Range: 9/3/2010 to 12/5/2012

573.6 (c)(3)

Total number of items affected: 11,227

573.6 (c)(5)

Combi USA, Inc. has identified a noncompliance with certain Model #8220 Coccoro Convertible child restraints when the webbing assembly within the restraint is subjected to the minimum breaking strength requirements as specified in FMVSS No. 213 section 5.4.1.2 (a).

Again, additional information supplementing the report will be provided as the information becomes available.

Respectfully,

Edward S. Whitaker Director of Quality and Regulatory Combi USA, Inc. 3520 Westinghouse Blvd., Suite B Charlotte, NC 28273 edw@combiusa.com

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