

**RECEIVED**

By Recall Management Division at 11:46 am, Jul 02, 2013

Date: 7/01/2013

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: **13C-002**

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)****Coccoro:**

Equipment Type: Child Restraint:  
Model # 8220,  
Model name: Coccoro

Based on the NHTSA testing conducted as part of the NHTSA 2012 safety compliance test program at the SGS North America, Inc., the Coccoro Convertible child restraint demonstrated the existence of a noncompliance relative to the harness webbing strength. The harness webbing assembly of the Coccoro Convertible child restraint includes an imbedded stop button. The imbedded stop button was removed from the Coccoro Convertible child restraint harness assembly on 1/29/2013. All previous production, unless duly noted as being modified, is affected.

Date Range: **1/6/2009 to 12/5/2012**

**Zeus Turn:**

Equipment Type: Child Restraint:  
Model # 8815  
Model name: Zeus Turn

Based on the NHTSA testing conducted as part of the NHTSA 2012 safety compliance test program at the SGS North America, Inc., the Coccoro Convertible child restraint demonstrated the existence of a noncompliance relative to the harness webbing strength. The harness webbing assembly of the Coccoro Convertible child restraint includes an imbedded stop button. This same imbedded stop button is also included on the Zeus Turn Convertible child restraint. All production of the Zeus Turn is affected. The Zeus Turn Convertible child restraint was discontinued 3/25/2009.

Date Range: **7/15/2007** to **3/25/2009**

**Zeus 360:**

Equipment Type: Child Restraint:  
Model # 8836  
Model name: Zeus 360

Based on the NHTSA testing conducted as part of the NHTSA 2012 safety compliance test program at the SGS North America, Inc., the Coccoro Convertible child restraint demonstrated the existence of a noncompliance relative to the harness webbing strength. The harness webbing assembly of the Coccoro Convertible child restraint includes an imbedded stop button. This same imbedded stop button is also included on the Zeus 360 Convertible child restraint. All production of the Zeus 360 is affected. The Zeus 360 Convertible child restraint was discontinued 5/24/2012.

Date Range: **2/25/2009** to **5/24/2012**

**573.6 (c)(3)**

Total number of items affected:

Coccoro: **23,357**

Zeus Turn: **4,391**

Zeus 360: **5,391**

**573.6 (c)(5)**

Combi USA, Inc. has identified a noncompliance with certain Model #8220 Coccoro, Model #8815 Zeus Turn and Model #8336 Zeus 360 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](mailto:edw@combiusa.com)  
Ph: 704 697 1690 x229  
Fax: 704 697 1695