



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

1200 New Jersey Avenue SE
Washington, DC 20590

December 30, 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

Dear Mr. Whitaker:

This letter serves to acknowledge Combi USA, Inc.'s notification to the National Highway Traffic Safety Administration (NHTSA) of a safety recall which will be conducted pursuant to Federal law for the product(s) listed below. Please review the following information to ensure that it conforms to your records as this information is being made available to the public. 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/8815 (ZEUS TURN)/9999
COMBI/8836 (ZEUS 360)/9999

Mfr's Report Date: December 6, 2013

NHTSA Campaign Number: 13C-002

Components:

CHILD SEAT

Potential Number of Units Affected: 33,139

Problem Description:

Combi USA, Inc. (Combi) is recalling certain model 8220 (Coccoro) child restraints manufactured January 6, 2009, through December 5, 2012; model 8836 (Zeus 360) child restraints manufactured February 25, 2009, through May 24, 2012; and model 8815 (Zeus Turn) manufactured from July 15, 2007, through March 25, 2009. The harness webbing fails to meet minimum breaking strength requirements. Thus, these child seats fail to comply to Federal Motor Vehicle Safety Standard No. 213, "Child Restraint Systems."

Consequence:

In the event of a crash, a child may not be remain adequately secured, increasing the risk of injury.

Remedy:

Combi will notify registered owners and provide free harness replacement kits along with repair instructions. The recall is expected to begin by February 6, 2014. Owners may contact Combi at 1-800-543-7734 or visit their website at www.combi-intl.com.

Notes:

Customers may contact the National Highway Traffic Safety Administration's vehicle safety hotline at 1-888-327-4236 (tty: 1-800-424-9153); or go to <http://www.safercar.gov>.

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 573 report states that owner notification will begin on, or about February 6, 2014. Please be reminded that it is required that owners will be notified of a safety defect in their child restraints within 60 days of a manufacturer's notification to NHTSA of a safety defect in those restraints. .

Please be reminded of the following requirements:

You are required to submit a draft owner notification letter to this office no less than five days prior to mailing it to the customers. Also, copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

As stated in Part 573.7, submission of the first of six consecutive quarterly status reports is required within one month after the close of the calendar quarter in which notification to purchasers occurs. Therefore, the first quarterly report will be due on, or before, 30 days after the close of the calendar quarter.

On August 20, 2013, NHTSA announced new changes to the requirements governing safety recalls. Some of these requirements are already in effect. Please ensure your company will be in compliance with each requirement on, or before, its respective effective date. For a summary of the requirements and their effective dates please click on the "New!" link at <http://www.safercar.gov/Vehicle+Manufacturers>.

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 or through the office email at rmd.odi@dot.gov. We look forward to working with you.

Sincerely,



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