

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 noncompliance 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 Zeus 360 (Model # 8836) 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 # 8836,
Model name: Zeus 360

Based on NHTSA Test Report No. 2383579-18 (Final Report 213-UST-11-18) conducted on June 15, 2011, the Zeus 360 passed all component testing. The date of manufacture of the items within the above test was Aug. 9, 2010 in which any subsequent production after this date of manufacture is affected up until the discontinuation of production. The Zeus 360 Convertible child restraint was discontinued 5/24/2012.

Date Range: **8/10/2010 to 5/24/2012**

573.6 (c)(3)

Total number of items affected: **2,812**

573.6 (c)(5)

Combi USA, Inc. has identified a noncompliance with certain Model #8836 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
Ph: 704 697 1690 x229
Fax: 704 697 1695