



Mr. Daniel C. Smith
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

June 2, 2008

Re: Defect Information Report; Chicco USA, Inc.

Dear Mr. Smith:

Through the undersigned, Chicco USA, Inc. (Chicco), is submitting the enclosed Defect Information Report pursuant to 49 CFR Part 573.

Chicco has determined that the certain of the "stay-in-car" bases used with the "Key-Fit"™ rear-facing child restraint systems (CRS) that it imported contain a defect that relates to motor vehicle safety. The CRSs and bases at issue were manufactured between February 26, 2008 and March 17, 2008. The models involved include the following: KeyFit, KeyFit 30, and Cortina Travel Systems containing the KeyFit or KeyFit 30, as well as stand-alone bases purchased separately.

Chicco has discovered that there was a problem with over-tightened brackets that secure the A-lock into the base of some of the CRSs manufactured during that period. This problem can cause the A-lock assembly in the base of the CRS to not operate as designed. If this occurs, the base cannot be secured tightly to the vehicle when the lower LATCH attachments are used. The base can be properly secured when it is installed using the vehicle's safety belts.

If you have any questions, please do not hesitate to contact the undersigned at (717) 808-3109.

Sincerely,

A handwritten signature in black ink that reads "Gregory E. Mansker". The signature is written in a cursive, flowing style.

Gregory E. Mansker
CEO

Enclosure

DEFECT INFORMATION REPORT
June 2, 2008

1. Manufacturer's name/address:

The manufacturer of the items of equipment covered by this Report is:

Chicco, USA, Inc.
1835 Freedom Road
Lancaster, PA 17601

2. Child Restraint Systems involved:

This report covers the Bases sold as part of the following Chicco rear-facing child restraint systems (CRS): the "KeyFit," the "KeyFit 30," and "Cortina Travel Systems" containing either the "KeyFit" or the "KeyFit 30." It also covers stand-alone Bases for these systems purchased separately. The Bases covered by this report were manufactured between February 26, 2008 and March 17, 2008.

3. Total number of Bases covered:

The total number of Bases covered by this Report is approximately 18,000. Chicco believes that more than half of these bases are still with dealers and distributors, and the company is in the process of retrieving them.

4. Approximate percentage of Bases estimated to actually contain the defect:

Chicco is not able to estimate at this time the actual percentage of the Bases manufactured during the period at issue that actually contain the defect. Therefore, all Bases manufactured between the identified dates will be included in the campaign.

5. Description of the defect:

Some of the Bases manufactured between February 26, 2008 and March 17, 2008 have a defect that can prevent the Base from being tightly secured to a vehicle when the lower LATCH attachments are used as the method of installation.

Specifically, when a defective Base is installed with the lower LATCH attachment straps, the webbing used to tighten the Base to the vehicle seat can slip through the adjustment lock. If the webbing were to slip during a vehicle crash, the Base could move, possibly increasing the risk of injury.

The Base can be properly secured when it is installed using the vehicle's safety belts.

6. Chronological summary of events leading to this determination:

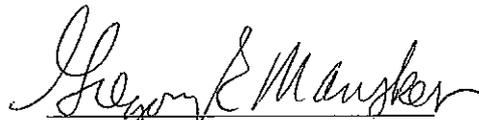
Chicco first became aware of a potential problem with the KeyFit CRS Base on May 21, 2008 upon receiving a defective Base from a consumer who had complained about being unable to tighten it in a motor vehicle installation. Chicco promptly took steps to analyze the issue and to identify the CRS Bases that might have the defect. As of May 30, 2008, Chicco has received ten similar complaints. Based on extensive inspection of more than 10,000 Bases, Chicco is confident that none of its CRS Bases manufactured outside of the period specified in Item 2 above contain the defect.

7. Program for remedying the defect:

Chicco plans to conduct a safety recall under which it will notify all owners of Bases manufactured during the covered period of the defect and provide a free replacement of any Base produced during that period. To ensure that the affected units are removed from use, Chicco will request the consumer to cut the lower LATCH connectors from the Base and return them to Chicco in a pre-paid envelope. Chicco will then send the consumer a replacement Base. The consumer can continue to use the old Base with the vehicle's safety belts. Chicco has already begun to notify its dealers and distributors, and it plans to begin notifying owners the week of June 2, 2008.

Chicco has not included information related to reimbursement of owner out-of-pocket expenses because the affected products are still covered by warranty.

Chicco will provide NHTSA with a copy of its proposed owner notification letter by separate cover.



Gregory E. Mansker
CEO

Chicco USA, Inc.