



Baby & Parenting
Essentials

AMENDMENT
08C-009
(2 pages)

December 8, 2008

Via Electronic Mail and Certified First Class Mail – Return Receipt Requested

Dan Smith, Associate Administrator
Office of Safety Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590
ATTN: George Person, Chief, Recall Management Division

**Re: Amended Part 573 Non-Compliance Information Report for
NHTSA Campaign Number 08C-009**

Dear Mr. Smith:

Pursuant to the requirements of 49 C.F.R. Part 573, Graco Children's Products Inc. ("Graco"), hereby is submitting this letter to amend the December 3, 2008 submission that had advised you of a noncompliance of Federal Motor Vehicle Safety Standard ("FMVSS") 213 in certain Graco child restraint systems (aka "car seats"). Specifically, based on Graco's ongoing investigation into this issue, we were able to verify the actual number of car seats affected by the issue identified in the earlier report. This number is slightly different from the earlier reported number. Accordingly, we are hereby correcting the total number of affected production units and the corresponding percentage of units potentially containing the non-compliance from those identified in the original notice. All other information not amended below and contained in the December 3, 2008 submission, remains correct.

573.6(c)(2): Identification of Car Seats Impacted

- A limited number of models of a single fashion (The Frazier™) ComfortSport™ convertible Car Seat ("child restraint system") manufactured from November 1, 2006 through October 8, 2007 were equipped with a supplemental, large sized pad or "body pillow" that partially obscures the mandatory child airbag warning label required by 49 C.F.R. §571.213 S5.5.2(k)(3). The body pillows were provided with the Frazier™ model as a supplemental component. Affected model numbers and quantities are as follows:

Model Number	Model Description	Total
8C04FRR	Comfort Sport Car Seat - Frazier™	37,434
8C04FRR2	Comfort Sport Car Seat - Frazier™	6560
Total Production		43,994



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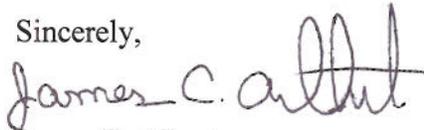
573.6(c)(3) & (4): Total Number of Car Seats Potentially Containing the Noncompliance

- Graco estimates that a total of 43,994 child restraint systems were produced with this non-compliance and that 100% of the child restraint systems identified in (c)(2) above are affected. At the time of discovery, Graco decided to replace body pillows in on-hand inventory with body pillows that had duplicative warning statements embossed on the pillow itself out of an abundance of caution. This action was taken despite the Company's position at that time that partial obscuring was still potentially compliant with the requirements of FMVSS 213. A subsequent interpretation letter issued by NHTSA dated November 20, 2008 and received on November 24, 2008 has clarified the status of the affected seats. Based on that letter, the 100% of seats with obscured labels are noncompliant.

* * *

If you or your staff have any questions, please feel free contact me at (610) 884-8320.

Sincerely,



James C. Albert
Senior Regulatory Specialist
Newell Rubbermaid / Graco Children's Products Inc.

cc: Claude Harris, Office of Vehicle Safety Compliance, NHTSA
Zack Fraser, Office of Vehicle Safety Compliance, NHTSA
Deirdre Fujita, Chief Counsel's Office, NHTSA

Stacy L. Broad, General Counsel, North America, Graco Children's Products Inc.
James C. Chen, Crowell and Moring LLP, Counsel to Graco Children's Products Inc.