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2008 DECEMBER 12
OFFICE OF DEFECTS INVESTIGATION
RECALL MGMT DIV.

08C-010
(4 pages)

December 10, 2008

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention Recall Management Division
1200 New Jersey Avenue, SE
West Building
Washington, DC 20590
202-366-4000

RE: 49 Part 573 Report for voluntary recall of Britax Child Safety, Inc. Frontier™ Child Restraints

Dear Sir or Madam:

For the past several months Britax Child Safety Inc. ("Britax") has continued to monitor consumer complaints related to twisted or loose/detached harness strap on a limited number of Frontier™ Child Restraint Systems. Britax has not been able to reproduce the consumer complaints except by loosening the harness straps one strap at a time with excessive, repetitive force. Britax has considered these concerns a product performance issue related to customer misuse with no unreasonable safety consequence. However, in conjunction with ongoing discussions with NHTSA staff, Britax has agreed to initiate a voluntary safety recall campaign. Therefore, pursuant to the requirements of 49 CFR Part 573 Britax Child Safety, Inc. submits this report having determined on December 3, 2008 to conduct a safety recall to address this issue.

In voluntary compliance with 49 CFR 573.6 Britax provides the following information.

1. Manufacturer's name/address:

Britax Child Safety, Inc.
13501 South Ridge Drive
Charlotte, NC 28273

2. Vehicles or Equipment involved in this defect notification:

Britax® Frontier™ Child Restraint Systems

Models: E9L54E7, E9L54H6, E9L54H7, E9L54M6, and E9L5490

Britax Child Safety, Inc.
13501 South Ridge Drive
Charlotte, NC 28273
USA

Tel: 704-409-1700
Fax: 704-409-1710

A Britax Childcare Group Ltd. company

3. Total number of vehicles or items of equipment:

Black Harness		Qty Manufactured
item	description	Before 9/15/2008
E9L54E7	FRONTIER RED ROCK	4998
E9L54H6	FRONTIER RUSHMORE	11237
E9L54H7	FRONTIER PINK SKY	6116
E9L54M6	FRONTIER CANYON	8421
	Total	30772

Beige Harness		Qty Manufactured
item	description	Before 9/18/2008
E9L5490	FRONTIER SAHARA	720

4. Approximate percentage of vehicles or equipment estimated to actually contain the defect:

All Frontier seats made from the first date of manufacture on April 1, 2008 until September 15 or 18, 2008 (as indicated above) contain the defect.

5. Description of the condition:

If the harness straps are loosened one strap at a time with excessive force, then the harness straps may become detached from the metal yoke located on the back of the child seat. If the harness strap becomes loose or detached then the condition can be corrected by inspecting the back of the child seat and reattaching the harness straps. If this condition persists, however, in the event of a vehicle crash, the child may not be properly restrained, possibly resulting in an increased risk of injury.

6. Chronological summary of events leading to this determination:

Beginning in May 2008, Britax received several complaints that the harness straps had become twisted or loose and detached from the yoke. Initially, Britax attempted to recreate the condition and was not able to replicate the detachment as described from the consumer complaints. At that time no Frontier child seats had been returned for inspection and Britax continued to monitor the field return data.

As Britax received additional complaints about twisting harness straps as well as harness strap detachment, Britax pursued additional testing and analyses. By loosening the harness straps one strap at a time with excessive, repetitive force, Britax was able to recreate the condition described by some of the consumer complaints. Although Britax believed that this condition reflected a misuse of the product, Britax wished to reduce the possibility of unwanted harness strap loosening in future production to increase customer satisfaction. Accordingly, on September 15 and 18, 2008, Britax began to manufacture Frontier™ Child Restraints with a modified harness strap that had been over-stitched to stiffen the harness loop which significantly reduced the potential for harness detachment. To date, there have not been any complaints of harness detachment for Frontier™ Child Restraints made after September 15 or 18, 2008.

In October and November 2008, Britax received additional consumer complaints of loose or detached harness straps in Frontier™ Child Restraints made before September 2008. Britax provided replacement harness straps to those consumers upon request but did not have the opportunity to inspect those affected child seats. Although Britax does not believe that the Frontier™ harness design is defective, Britax has agreed to conduct a voluntary safety recall to address this issue and make it less likely that the harness can detach unintentionally.

7. Description of proposed remedy (including schedule for dealer and customer notification):

As noted above, beginning in September, 2008 Britax began manufacturing Frontier™ Child Restraints with a modified harness loop. However, the difficulty in requiring consumers to replace their harness straps and in matching the various harness strap colors to consumer's child seats means that this running change would not be an effective campaign remedy. Instead, Britax will provide two rubber caps that can be easily placed on the yoke slots to prevent the harness straps from detaching. The rubber caps have been specifically designed for the Frontier yoke to provide a secure fit and have been tested to verify their effectiveness.

The rubber caps will be provided with an instruction sheet and will be sent to all registered Frontier™ Child Restraint owners with manufacturing dates prior to September 15 or 18, 2008. Additional caps will be made available to Retailers with affected inventory of Frontiers manufactured before September 15 or 18, 2008.

8. Program for remedy campaign (including program for reimbursing any consumer who obtained the remedy at his/her own expense within one year of the opening of the EA, or within one year of this 573 report, whichever is earlier):

Britax will mail the Consumer Notice and Remedy Kits to all 5546 registered consumers beginning on January 7, 2009. Information and instructions related to the campaign will be

posted on the Britax web site at www.Britaxusa.com no later than December 17, 2008. A reimbursement program is not necessary because no consumer was charged for a replacement harness prior to this date.

Britax will mail Retailer Notices also beginning on January 7, 2009.

Respectfully Submitted,

A handwritten signature in black ink that reads "Ron Marsilio". The signature is written in a cursive style with a large initial "R" and "M".

Ron Marsilio
Director of Engineering
Britax Child Safety, Inc