

Amended Information Report for Equipment

Peg Perego U.S.A., Inc. (“Peg Perego”) is submitting this Information Report related to complaints of cuts, scratches or abrasions suffered by children allegedly caused by excessive flash on some restraint harness adjuster covers on its Primo Viaggio SIP 30/30 infant car seats.

Peg Perego has tested the infant car seat extensively and denies that it violates any of the crashworthiness tests as set forth in Federal Motor Vehicle Safety Standard 213 or that any surface of the plastic adjuster cover qualifies as a “sharp edge” as defined by 16 C.F.R § 1500.49 (Technical requirements for determining a sharp metal or glass edge in toys and other articles intended for use by children under 8 years of age.)

Date this report was prepared: January 9, 2009

1. Identify the full corporate name of the manufacturer/importer of equipment.

Peg Perego U.S.A., Inc., 3625 Independence Drive, Fort Wayne, Indiana 46808 is the importer of Primo Viaggio car seats and car seat systems from Peg Perego S.p.A. in Italy. Peg Perego also imported and sold car seats on a very limited basis under a private label of “Jacadi” as well.

2. Identify the Items of Equipment Involved in this report:

Generic name of the item: Infant car seat

Make: Peg Perego Model: Primo Viaggio SIP 30/30 infant car seat

Model Number:

Brand Name	Model No.	Model Description/Brand
Peg Perego	IMUN00US32MD41KN41	PRIMO VIAGGIO CAR SEAT SIP 30/30 MIDNIGH
Peg Perego	IMUN00US35CR13BU13	P.VIAGGIO CAR SEAT SIP 30/30 BLACK BUBBL
Peg Perego	IMUN00US35CR13PL46	P.VIAGGIO CAR SEAT SIP 30/30 ECOPELLE
Peg Perego	IMUN00US35CR24BU24	P.VIAGGIO CAR SEAT SIP 30/30 GREEN BUBBL
Peg Perego	IMUN00US35TL49KN53	PRIMO VIAGGIO CAR SEAT SIP 30/30 TANGO
Peg Perego	IMUN00US35TL53KN46	PRIMO VIAGGIO CAR SEAT SIP 30/30 MOKA
Peg Perego	IMUN00US61ST13IC53	PRIMO VIAGGIO CAR SEAT SIP 30/30 ICE
Peg Perego	IMUN00US61ST34IC53	PRIMO VIAGGIO CAR SEAT SIP 30/30 WAVE
Peg Perego	IMUN00US61ST48IC53	PRIMO VIAGGIO CAR SEAT SIP 30/30 SURF

Size: up to 30 lbs

Function: Infant car seat with locking base to secure to automobile seat

Model Years Involved: 2008

Other information which characterizes/distinguishes the items of equipment to be recalled:
Manufacturing date codes between July 1, 2007 and March 14, 2008

3. Total Number of Items of Equipment Imported and Shipped.

Total number of Primo Viaggio SIP 30/30 infant seats imported from July 1, 2007 to the present is 41,363.

4. Approximate percentage of equipment estimated to present this issue.

Of the total 41,363 it is believed that approximately 32,641 were produced and shipped between July 1, 2007 and March 30, 2008. This represents 79% of the total model year 2008 production.

However, many of these have already been repaired by the following methods:

- a) reworked in-house prior to leaving the distribution center (4600 pieces);
- b) inspected 2969 in inventory to ensure not within the relevant date code (i.e., produced after March 14, 2008); and
- c) new parts were sent to customers who registered their car seats with the company (4658 pieces).

Therefore, of the 32,641 that could present this issue, 12,227 have already been repaired, reworked or inspected to ensure they were not within the relevant date range. That means only 20,414 remain that could still have this issue. However, even that number may be high given that fact that Peg Perego does not believe that every part number 6339 had a small edging of flash. Based on these figures, over 37% of the potentially problematic infant seats have already been addressed. Therefore, as related to the overall number for production year 2008 (41,363), approximately 49.5% of the seats may present this issue.

5. Description of the Issue.

There have been 91 complaints of children receiving cuts, scratches or abrasions on their feet or legs when they kick the plastic adjuster cover with bare feet. Some of the plastic adjuster covers produced during this time period, (part number 6339) had a small edge of flash on the interior surface of the adjuster cover. Only one of the reported incidents required any medical treatment.

6. Summary of Reaching This Determination.

During a routine review of the product, the R&D department of Peg Perego Italy decided that the design of the mold for the adjuster cover placed the parting line of the mold directly on the surface of the interior edge should be changed. The decision to make the change was made before any complaint had been received from a consumer. While it was believed that the other mold could still create conforming pieces, it had a much smaller tolerance for variations in molding quality which could vary with ambient temperature/humidity/barometric pressure. In addition, other variables such as injection pressure, clamp pressure, fill volume or injection temperature could have an effect on whether flash would be created as well. To eliminate the possibility of creation of flash directly on the interior edge of the opening on the adjuster cover, a new mold was created to where the parting line of mold was not on the surface of the interior edge. Therefore, even if flash could be present, that flash would not be accessible by the consumer as it would be face-down on top of the upholstery when the piece was snapped into place. The surface of the interior edge of the new piece is very smooth. By the time the first complaint had been received from a consumer in the United States, the new piece had been used in production for over one month in Italy.

Peg Perego eventually received approximately 91 complaints regarding this issue after the part had been changed and therefore it decided to initiate this Safety Notice campaign.

7. Description of Proposed Remedy.

A new replacement plastic adjuster cover has been used in production in Italy since no later than March 14, 2008. Since production is in Italy, there is a 6-8 week lag between production, shipment to the United States, distribution throughout the United States and then ultimate sale to the consumer. A brand new mold was created for the adjuster cover to move the parting line of the piece so that it would be below the surface of the plastic adjustment cover. The original part number was 6339. It is imprinted on the bottom of every adjuster cover. The new part is part number 6491. It is also imprinted on the bottom of every adjuster cover.

The original piece was not removed from production, but Perego USA took measures to remediate all pieces in inventory through re-work through quality control. The adjuster covers were either hand-sanded or flame treated to remove any flash on the interior edges of the adjuster cover. Beginning with the first consumer who called on April 18, 2008, replacement parts were provided to customers that were personally inspected and repaired (i.e., sanded) to remove any flash from the interior edge of the adjuster cover. This repaired 4600 adjuster covers. From that point forward, consumers were either sent repaired part number 6339, or later they were sent the new part number 6491.

The new part can easily be installed by the consumer by simply pulling out the existing adjuster cover and inserting and snapping the new piece into place. No special instructions have been needed to date and consumers have been able to replace the part upon receipt of the replacement. To date, 4,658 replacement parts 6491 have been sent to registered car seat owners..

Peg Perego plans to institute this Safety Notice Campaign through the following methods:

1. Work with “big box” retailers to either have visual inspection of inventory to ensure that product within the relevant date codes are either repaired or removed from inventory (approximately 1400 pieces);
2. Sales representatives and/or smaller retailers will check their inventory to ensure that product within the relevant date codes are either repaired or removed from inventory (approximately);
3. New parts will be sent to any consumer who sends in a registration card showing a product within the relevant date code range;
4. Consumers who call the customer service line or contact the company through the website regarding this issue will received a new replacement part if their product is within the relevant date code range;
5. Direct mailings to drop shipment lists will be utilized to reach the maximum number of actual consumers purchasing the products (estimated number = 2800);
6. Internet notices on company website including a separate button to notify people of the important safety notice for the Primo Viaggio car seat. The text of the notice is attached hereto as Exhibit A.
7. It will be posted on other safety awareness watchdog websites (i.e., Safety Belt U.S.A. (www.carseat.org) and Safe Kids Worldwide (www.safekids.org) to notify general public about availability of free replacement parts.