Dear Mr. Smith,

On February 21, 2007 RECARO North America, Incorporated decided that a defect which relates to motor vehicle safety exists in Como and Signo child restraint systems shipped prior to December 18, 2007. RECARO is filing this Defect Information Report in compliance with 49 CFR 573.6(c).

(1) The manufacturer's name:

RECARO North America, Inc.
4120 Luella Lane
Auburn Hills MI 48326

Contact: Mike Murto
Phone: 248-340-1183
Email: mike.murto@recarousa.com

(2) Identification of the items of motor vehicle equipment potentially containing the defect:

Signo and Como child restraint systems manufactured prior to December 18th, 2007.

Signo Models: 330.00.MM58 (Cobalt); 330.00.MM14 (Midnight Desert); 330.00.MM34 (Sand); 330.00.MM5A (Blush)

Como Models: 331.00.MM58 (Cobalt); 331.00.MM14 (Midnight Desert); 331.00.MM34 (Sand); 331.00.MM5A (Blush)
(3) The total number of child restraint systems potentially containing the defect:
Como: 4,218 child restraint systems
Signo: 3,280 child restraint systems

(4) The percentage items of equipment estimated to actually contain the defect:
Como: 100%
Signo: 100%

(5) A description of the defect:
Brief Description: The harness may become disconnected from the harness connector when a child is placed in or removed from the child seat. If the harness becomes disconnected and a vehicle crash occurs, the child will not be securely fastened to their child seat and may sustain an injury.

(6) A chronology of events that were the basis for the determination that the defect related to motor vehicle safety:
In October, RECARO North America received a customer complaint regarding the shoulder harness not securely holding a child in their Como child restraint. RECARO was unable to duplicate the complaint.

In mid-October the same customer returned her seat because the issue happened again. RECARO tried to duplicate the issue and could not do so. A customer service representative at RECARO took a different seat home to evaluate in-use for a week. She returned the seat, reporting that she did not find a problem.

In December two additional complaints were received.

Bench testing conducted at RECARO (near Christmas) resulting in achieving disengagement of the harness from the harness connector, although it was still not clear how this would occur in the field.

In early January, testing was conducted to test the durability of rubber caps as a possible means of addressing this condition. The caps were tested in a heated environment. Temperature did not play a role in any deformation of the cap.

In early January, a sled test was conducted proving out the strength of a new t-bar design concept (long term solution). The test passed with no issues reported.
In late January, RECARO received another call reporting harness disconnection. This was the first time the harness was found to be disconnected after the consumer arrived at his/her destination.

In first week of February, RECARO received 3 calls reporting harness disconnection. In the midst of these calls, a test method was drafted & then tested in mid February. The results were consistent and repeatable.

(8)(i) A description of the manufacturer’s program for remedying the defect or noncompliance.

To prevent this condition from occurring, it was determined that two rubber caps could be used to close the gap. These rubber caps create an obstruction which will prevent the harness from sliding off the connector, while at the same time it will be easy enough for the customer to remove the caps to adjust the head rest position on the Como or to remove the cover for washing on either seat.

The two rubber caps will provide a remedy that our customers can install themselves, thereby getting the remedy to the field very quickly. RECARO will send out rework kits to consumers and retailers containing two rubber caps and an instruction sheet. (All material in house manufactured prior to December 18 will be supplied with two rubber caps already installed and the necessary manual updates will be provided).

This product improvement was validated on February 19, 2008. Cycle testing and temperature evaluation were performed. The rubber caps and harness remained secure.

(ii) The estimated date(s) on which it will begin sending notifications to owners, and to dealers and distributors:

RECARO Dealer notification letter: 2/21/08

RECARO announcement notification letter: 2/21/08

RECARO rubber cap instruction letter: 2/21/08

RECARO installation kits: 2/26/08

Note: As kits are built, they will be shipped out to retailers and consumers. The date, Friday February 26th, 2008, will be the last day of shipment for the kits.
(10) A representative copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and are sent to more than one manufacturer, distributor, dealer or purchaser. These copies shall be submitted to NHTSA’s Recall Management Division (NVS–215) (RMD), not later than 5 days after they are initially sent to manufacturers, distributors, dealers, or purchasers. Submission shall be made by any means, including those means identified in §573.9 of this part, which permits the manufacturer to verify promptly that the copy was in fact received by RMD and the date it was received by RMD.

Please see attached documents: Dealer Letter, Announcement Letter, Kit Letter and Instruction Sheet.

(11) The manufacturer’s campaign number, if not identical to the identification number assigned by NHTSA.

RECARO Campaign Number: 001

Kind regards,

Daniella Marcuzzi
Program Manager – Child Seats
RECARO North America, Inc.

Cc: Fax to George Person (202-366-7882)
SAFETY RECALL NOTICE TO DEALERS

February, 2008

Dear RECARO Dealer:

This notice is being sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act. RECARO has decided that a defect which relates to motor vehicle safety exists in Como and Signo child restraint systems manufactured prior to December 18, 2007. According to our records, the child restraint systems in your store may be affected and should not be distributed until a safety recall kit is installed. A copy of the letter RECARO is sending to individuals who have purchased and registered their child restraint systems is enclosed.

What Is This Recall About
During product evaluation and feedback from the field, it was discovered that the harness may become disconnected from the harness connector when a child is placed in or removed from the child seat. If the harness becomes disconnected and a vehicle crash occurs, the child will not be securely fastened to their child seat and may sustain an injury.

There have been no reported injuries.

What Should You Do As A Dealer
To remedy this condition, RECARO is issuing a safety recall kit containing two rubber caps for installation on the harness connector and an instruction sheet. The use of the rubber caps will close up the gaps that would allow the harness to disconnect. The instruction sheet provides the necessary steps to install and remove the rubber caps when the head restraint must be adjusted (Como) or when you remove the trim cover to wash it. Kits will be distributed to you no later than Tuesday February 26th.

It is important to point out that it is a violation of Federal law for a dealer to deliver a child restraint system covered by this safety recall notice under a sale or lease until the defect or noncompliance is remedied.

Questions
Please contact our customer service department at 1-800-8-RECARO or childseat@recarousa.com, if you have any questions regarding this issue or installation of the caps. When you contact RECARO, please have your model, serial numbers and manufacturer dates on hand. It is important these three items are provided otherwise kits can not be sent.

We apologize for this inconvenience however we wanted to ensure your product was not distributed.

Sincerely,

RECARO Child Seat Division

RECARO North America, Inc.
4120 Luedke Lane, Auburn Hills, MI 48326, USA
Phone: 248-364-3818  Fax: 248-364-3804
800 line: 1-800-8-RECARO
Internet : www.recaro.com, E-mail: info@recarousa.com
February, 2008

SAFETY RECALL NOTICE

Dear RECARO Owner:

This notice is being sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act. RECARO has decided that a defect which relates to motor vehicle safety exists in Como and Signo child restraint systems manufactured prior to December 18, 2007. According to our records, your child restraint system is involved in this recall.

What Is This Recall About
During product evaluation and feedback from the field, it was discovered that the harness may become disconnected from the harness connector when a child is placed in or removed from the child seat. If the harness becomes disconnected and a vehicle crash occurs, your child may not be securely fastened to their child seat and may sustain an injury.

There have been no reported injuries.

What Should You Do As A Consumer
To remedy this condition, RECARO is issuing a safety recall kit containing two rubber caps for installation on the harness connector and an instruction sheet. The use of the rubber caps will close up the gaps that will allow the harness to disconnect. The instruction sheet provides the necessary steps to install and remove the rubber caps when the head restraint must be adjusted (Como) or when you remove the trim cover to wash it.

Questions
Please contact our customer service department at 1-800-8-RECARO if you have any questions regarding this issue or installation of the caps. When you call, please have your model, serial number and manufacturer date on hand.

If you believe that RECARO has failed or is unable to remedy this issue in a timely manner without cost, please call the RECARO customer service department at 1-800-8-RECARO. If you are not satisfied, you may submit a complaint to the Administrator, National Highway Traffic Safety Administration, 1200 New Jersey Avenue, SE, Washington, DC 20590 or call the toll free Auto Safety Hotline at 1-888-327-4236 (TTY: 1-800-424-9153) or go to http://www.safecar.gov.

We apologize for this inconvenience however your child’s safety is our number one priority.

Sincerely,

RECARO Child Seat Division
SAFETY RECALL NOTICE

John Smith
123 Address Drive
City, ST 12345-1234