



U.S. Department of Transportation
**National Highway Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

September 16, 2016

Mr. Dave Galambos
Regulatory Manager
Graco Children's Products Inc.
3 Glenlake Parkway
Atlanta, GA 30328

NEF-150KS
15C-004

Subject: Missing Information on Label/FMVSS 213

Dear Mr. Galambos:

This letter serves to acknowledge Graco Children's Products Inc.'s notification to the National Highway Traffic Safety Administration (NHTSA) of a safety recall which will be conducted pursuant to Federal law for the product(s) listed below. Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

Makes/Models/Model Years:

GRACO/MILESTONE/9999

Mfr's Report Date: September 1, 2016

NHTSA Campaign Number: 15C-004

Components:

CHILD SEAT

Potential Number of Units Affected: 8,240

Problem Description:

Graco Children's Products Inc. (Graco) is recalling certain Milestone child seats, model numbers 1910130, 1923980, 1926538, and 1926539, for failing to comply with the requirements of Federal Motor Vehicle Safety Standard number 213, "Child Restraint Systems." The affected child seat have labels that are missing the required phrase "Secure this child restraint with the vehicle's child restraint anchorage system (LATCH) if available or with a vehicle belt."

Consequence:

An improperly secured child seat may increase the risk of injury in the event of a crash.

Remedy:

Graco will notify owners and provide them with new labels that contain all of the required information, free of charge. The recall is expected to begin during September 2016. Owners may contact Graco customer service at 1-800-345-4109.

Notes:

Owners may also contact the National Highway Traffic Safety Administration Vehicle Safety Hotline at 1-888-327-4236 (TTY 1-800-424-9153), or go to www.safercar.gov.

We note that your report states that Graco does not believe that the noncompliant child seat label presents a safety risk. In our view, this statement has no force or effect in terms of Graco's obligation to undertake and complete the recall and NHTSA does not agree with it. Graco's owner notification letter must be fully compliant with Part 577.

Under 49 U.S.C. § 30112(a), it is illegal for anyone, including a manufacturer, distributor, dealer, or retailer to sell a child seat that fails to comply with all applicable Federal motor vehicle safety standards.

Please be reminded of the following requirements:

You are required to submit a draft owner notification letter to this office no less than five days prior to mailing it to the customers. Also, copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

As stated in Part 573.7, submission of the first of six consecutive quarterly status reports is required within one month after the close of the calendar quarter in which notification to purchasers occurs. Therefore, the first quarterly report will be due on, or before, 30 days after the close of the calendar quarter.

Your contact for this recall will be Kelly Schuler who may be reached by phone at (202) 366-5227, or by email at kelly.schuler@dot.gov or through the office email at rmd.odi@dot.gov. We look forward to working with you.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Timian", with a stylized flourish at the end.

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigations
Enforcement