OMB Control No.: 2127-0004

Part 573 Safety Recall Report

21E-003

Manufacturer Name: Strategic Sports, Ltd.

Submission Date: JAN 12, 2021 NHTSA Recall No.: 21E-003



Manufacturer Information:

Manufacturer Recall No.: NR

Manufacturer Name: Strategic Sports, Ltd.

Address: 364 F Avenue

Coronado CA 92118

Company phone: 8618110

Population:

Number of potentially involved : 3,752Estimated percentage with defect : $100\,\%$

Equipment Information:

Brand / Trade 1: Simpson Performance Prod

Model: Shorty-OTW Part No.: ST-205

Size: XS, S, M, L, XL Function: Head protection

Descriptive Information: Recall decision was made after failures resulted from a random sample test at a

NHTSA contract testing lab.

Fabricating manufacturer is unable to replicate 2 of the 3 failing test results form

the contract test lab. Searching production records shows a shift in

manufacturing methods and personnel occurred in the date range specified by

the recall population. While not conclusive, all production following the

manufacturing change is being recalled in an abundance of caution. This includes 3752 pieces spread across all sizes within the dates specified in the "Production"

Dates: boxes in this report.

Production Dates: MAR 01, 2017 - AUG 11, 2020

Description of Defect:

Description of the Defect: Helmet failed the penetration test outlined in FMVSS-218.

Helmet failed the updated labeling requirements in FMVSS-218

Helmet failed to maintain the integrity of the retention system as specified in

FMVSS-218

FMVSS 1: 218 - Motorcycle helmets

FMVSS 2: NR

Description of the Safety Risk: Any other helmets that are part of the recall population carry the risk of

serious head injury.

Description of the Cause: In the case of the labeling failure, the cause was a missed update to the labeling

requirements of FMVSS-218.

In the case of the retention system failure there is uncertainty as to why the sample helmet failed in the contract lab, but never before during a large number of production batch tests performed in strict accord with FMVSS-218. In the case of the penetration failure the fabricating manufacturer can only assume that a manufacturing change occured when the workshop responsible for fiberglass molding was reorganized and re-staffed in late 2016. Again, in an abundance of caution, we are proposing to recall all helmets manufactured after that date.

that can Occur:

Identification of Any Warning There are no telltale signs that would precede any failure during a crash.

Involved Components:

Component Name: Nexus TSR-3/4"

Component Description: 3/4" side-release buckle

Component Part Number: 150-0075

Supplier Identification:

Component Manufacturer

Name: Strategic Sports. Ltd Address: 1610 Concordia Plaza

1, Science Museum Rd. (TST) Kowloon Foreign States N/A

Country: China

Chronology:

With every purchase order and production run, a full set of samples is sent to our in-house test lab. There has never been an instance of any failure in the fabricating manufacturers own test lab. The only event that precipitated the decision to initiate a recall was a single random test performed by a contract test lab at the request of the NHTSA Compliance Division.

Description of Remedy:

Description of Remedy Program: The defects are three:

The helmets tested (2) showed an obsolete version of the labeling

requirements set forth in FMVSS-218.

The helmets tested failed the retention integrity test through a failed

plastic buckle.

The only remedy offered is a full refund to each end-user of their purchase

price and collection of the offending helmets.

How Remedy Component Differs There will be no remedy equipment. The recalled helmet is a unique use

from Recalled Component: helmet for which no other models are made.

Identify How/When Recall Condition The recall condition will not be corrected. Instead the importer has

was Corrected in Production: chosen to no longer offer this category of helmet for sale.

Recall Schedule:

Description of Recall Schedule: Recall notifications will be sent to all dealers before 15-Feb-2021. All

dealer mailings will be completed by 1-Mar-2021.

All direct to owner notifications will be sent out by 1-Mar-2021 with the exception of names that come to the attention of the recall coordinator,

no later than 15-Feb-2021.

Notifications to owners who purchased the helmet online will be made by

email directly to the consumer.

Notifications to Dealers will be made by USPS mail.

Follow-up contact attempts will be made to all Dealers and end-users

that have not responded to the first notice by 29-Mar-2021.

Planned Dealer Notification Date : FEB 15, 2021 - MAR 29, 2021 Planned Owner Notification Date : FEB 15, 2021 - MAR 29, 2021

Purchaser Information:

The following manufacturers purchased this defective/noncompliant equipment for possible use or installation in new motor vehicles or new items of motor vehicle equipment:

Name: NR

Address: NR

NR

Country: NR

Company Phone: NR

^{*} NR - Not Reported