



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

1200 New Jersey Avenue SE
Washington, DC 20590

February 28, 2022

Ms. Julie Gerstenberg
Comoto Holdings, Inc.
4020 S 26th St
Philadelphia, PA 19112

NEF-107CL
22E-012

Subject: Helmets May Not Protect From Impact/FMVSS 218

Dear Ms. Gerstenberg:

This letter serves to acknowledge Comoto Holdings, 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:

STREET & STEEL HELMET/S&S RAIDER HELMET/9999

Mfr's Report Date: February 22, 2022

NHTSA Campaign Number: 22E-012

Components:

EQUIPMENT:MOTORCYCLE:HELMETS

Potential Number of Units Affected: 1,704

Problem Description:

Comoto Holding, Inc. (Comoto) is recalling certain Street & Steel motorcycle helmets, model S&S Raider, part number SSHR, in sizes XS, MD, LG, and 2XL. The helmet may not adequately protect the wearer in the event of a head impact during a crash. As such, these helmets fail to comply with the requirements of Federal Motor Vehicle Safety Standard number 218, "Motorcycle Helmets."

Consequence:

A helmet that does not provide adequate impact protection increases the risk of injury during a crash.

Remedy:

Comoto will replace the helmet with a compliant Street & Steel model helmet, free of charge, or provide credit to replace the helmet. Owner notification letters are expected to be mailed in February 2022. Owners may contact Comoto customer service at 1-215-693-2191.

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.nhtsa.gov.

Please ensure the following requirements are met:

An identification and description of the risk to motor vehicle safety reasonably related to the defect or noncompliance (49 CFR 573.6 (c)(5)). All filings should state an increased risk of either a crash, injury or fire.

AMENDED 573 REQUIRED.

As required in Part 573.6(c)(7), in the case of a noncompliance, please provide the test results and other information used to determine the existence of the noncompliance. Include the date of each test and observation that indicated that a noncompliance might or did exist.

AMENDED 573 REQUIRED.

Please revise the estimated date(s) for which your company will notify owners regarding this safety recall. 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. Please be reminded that all owners must be notified of the safety risk associated with this filing within 60 days of the 573 being submitted. If the remedy is not available at that time, mail the interim notice, following it with a second notice once the remedy becomes available. If your company subsequently becomes aware that either the beginning or the completion dates reported to the agency for any of the notifications will be delayed by more than two weeks, your company shall promptly advise the agency of the delay and the reasons therefor, and furnish a revised estimate. If there are no owners involved in this recall, please state so in the 573 (49 CFR 573.6 (c)(8)(ii)).

AMENDED 573 REQUIRED.

Please be reminded of the following requirements:

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).

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

As stated in Part 573.7, submission of the first of eight 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.

Comoto Holdings, Inc.'s contact for this recall will be Choon Lee who may be reached by email at choon.lee@dot.gov. We look forward to working with you.

Sincerely,



Alex Ansley
Chief, Recall Management Division
Office of Defects Investigation
Enforcement