



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

1200 New Jersey Avenue SE
Washington, DC 20590

October 28, 2022

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

NEF-107DR
22E-089

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:

BILT HELMET/GROMMET BOLT YOUTH HELMET/9999
BILT HELMET/GROMMET YOUTH HELMET/9999

Mfr's Report Date: October 18, 2022

NHTSA Campaign Number: 22E-089

Components:

EQUIPMENT:MOTORCYCLE:HELMETS

Potential Number of Units Affected: 2,362

Problem Description:

Comoto Holdings, Inc. (Comoto) is recalling certain Bilt Grommet Youth and Grommet Bolt Youth helmets with part numbers BLH137 and BLH138; in sizes SY, MY, and LY. 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 BILT model helmet, free of charge, or provide credit to replace the helmet. Owner notification letters are expected to be mailed December 1, 2022. Owners may contact Comoto's customer service at 1-800-292-5343.

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:

Per the requirements of 49 USC 30119, please provide the part number, name and description of the component or components involved in this recall. This information should be provided in an amended 573 in the "Involved Components" section.

AMENDED 573 REQUIRED.

We note that your report states that Comoto believes that this matter has a "very rare" safety risk. In our view, this statement has no force or effect in terms of Comoto's obligation to undertake and complete the recall, and NHTSA does not agree with it.

The information in your report suggests that Comoto may have been aware of this issue more than five business days before filing a report with NHTSA. Please be reminded that under Federal law, this agency is to be notified of all safety defect and/or noncompliance decisions within five business days. 49 CFR 573.6 Significant civil penalties can be assessed for this violation.

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).

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 Darishea Rollins who may be reached by email at darishea.rollins@dot.gov. We look forward to working with you.

Sincerely,



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