



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

1200 New Jersey Avenue SE.
Washington, DC 20590

October 19, 2009

Mr. David Champion
Deputy Technical Director
Auto Test Center
Consumers Union
3 Hall Kilbourne Road
Colchester, CT 06415

Dear Mr. Champion:

Thank you for your August 18 letter advising the National Highway Traffic Safety Administration (NHTSA) that Consumers Union (CU) observed two Orbit Baby, Inc. (Orbit) child restraint systems separate from their bases during dynamic sled tests performed at MGA Research Corporation (MGA). You requested that NHTSA look into the performance of Orbit's child restraint systems.

NHTSA appreciates your interest in motor vehicle safety and ensuring that child restraint systems meet all applicable Federal Motor Vehicle Safety Standards (FMVSS). In the performance of its safety mission, the agency considers seriously claims related to the safety performance of child restraint systems. In response to the information CU provided, NHTSA has taken several actions. These are explained below.

As background, your August 18 letter stated that CU tested six Orbit Infant Car Seat and Base (model ORB803000) child restraint systems in accordance with FMVSS No. 213, "Child restraint systems." You noted that one of the two separations occurred when the child restraint was secured with a lap and shoulder belt which is not contemplated by FMVSS No. 213. The second separation occurred using the restraint's lower anchors.

Following CU's testing, Orbit conducted testing at MGA on eight Orbit Infant Car Seat and Base restraints replicating CU's installation methods and test configurations. Orbit reported that no separations occurred.

On September 1, NHTSA conducted FMVSS No. 213 compliance tests on four Orbit Infant Car Seat and Base restraints at MGA. There were three installation methods used in these tests which differed from the CU tests conducted in August: a different harness slot was used (middle slot as compared to the top slot used by CU), the "StrongArm" tightening feature was engaged in three of the four tests (the StrongArm was not engaged for CU's tests), and no lap and shoulder belt was used. All four restraints passed the head injury criteria (HIC), chest g, and excursion criteria requirements contained in FMVSS No. 213 and no separations were observed.

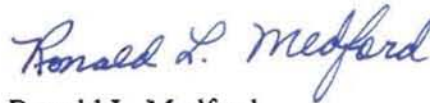


On September 28, NHTSA conducted research tests on four additional Orbit Infant Car Seat and Base restraints at MGA. These tests replicated the CU test configurations and installation methods. Representatives from both Orbit and CU observed the research tests. All four restraints passed the head injury criteria (HIC), chest g, and excursion criteria requirements contained in FMVSS No. 213 and no separations were observed.

In addition to the dynamic testing performed by NHTSA, the agency reviewed its database for safety-related field incidents. The Office of Defects Investigation (ODI) did not find any safety-related consumer complaints, Early Warning Reporting (EWR) death or injury incidents or other field data related to the Orbit Infant Car Seat and Base. Also, Orbit informed NHTSA that it has not received any safety-related complaints or claims involving the Orbit Infant Car Seat and Base.

Based on the above information, NHTSA believes that no further action is currently warranted. NHTSA's Office of Vehicle Safety Compliance will continue to monitor Orbit child restraints and include them in its annual compliance test program and ODI will continue to monitor EWR and field data for incidents involving Orbit child restraint systems restraints.

Sincerely,

A handwritten signature in blue ink that reads "Ronald L. Medford". The signature is written in a cursive style with a large, looped "M" and "D".

Ronald L. Medford
Acting Deputy Administrator