COLUMBUS
TRADING - PARTNERS

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July 5, 2022

Via eMail

Via Electronic Mail
Ms. Claudia Covell
Ms. Kelley Adams-Campos
NHTSA
Office of Vehicle Safety Compliance
Room W43-491
1200 New Jersey Avenue SE
Washington, DC 20590
kelley.adamscampos@dot.gov
claudia.covell@dot.gov

Re: Petition for Inconsequential Noncompliance

Dear Ms. Covell and Ms. Adams-Campos:

Columbus Trading-Partners USA, Inc. ("CTP"), the United States distributor of Cybex child restraints, learned that 31,080 US child restraint systems manufactured with central adjuster straps are potentially nonconforming with webbing abrasion test requirements in FMVSS 213 §5.4.1.2(b)(1). Attached is CTP's Petition for a Determination of Inconsequential Noncompliance.

Please call me if you require additional information. My direct dial telephone number is (937) 305-9310. If you prefer to email, my email address is Jessica.kimes@goodbabyint.com. Thank you for your time and attention to this matter.

Sincerely,

DocuSigned by:
Jessica L. S. Kimes
EA0AE34E0DE74C3...

Jessica L. S. Kimes
General Counsel

PETITION FOR DETERMINATON OF INCONSEQUENTIAL NONCOMPLIANCE

1. Manufacturer Identification: The full name and address of the applicant, the nature of its organization, and the name of the state or country under the law of which it is organized.

CTP is a United States distributor of juvenile products manufactured by CYBEX, including automobile child restraints.

Columbus Trading-Partners USA, Inc.
120 Royall Street
Canton, MA 020201

2. Noncompliance: A description of the Noncompliance and the standard(s) in which you seek exemption.

NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 213, §5.1(d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.2.1(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. As such, CTP files this petition to outline the rationale for these positions and respectfully requests that NHTSA grant its petition for exemption.

3. Statement of Request: State that the company is requesting an exemption from the recall notification and remedy requirements under 49 USC 30188 and 30120.

Pursuant to the former National Traffic and Motor Vehicle Safety Act, 49 U.S.C. Chapter 301 (the "Safety Act") and 49 C.F.R. Part 556, CTP submits this petition for exemption from the notification and remedy requirements of Chapter 301 because its noncompliance is inconsequential as it relates to motor vehicle safety.

4. Population: a description of the equipment involved.

The equipment involved in this notification is child restraint systems with the subject central adjuster webbing manufactured by CYBEX from June 6th, 2017 – November 1, 2020. Models are listed in the table below. Child restraints with webbing manufactured in 2021 were verified to be compliant to FMVSS S5.4.1.2 (b)(1) as shown in table 1 on page 11 of Final Report No. 4807558-024 dated January 14, 2022. This Final Report is attached as Exhibit 1.[1]

Cybex Model	2017 Units Manufactured	2018 Units Manufactured	2019 Units Manufactured	2020 Units Manufactured	Total Units Manufactured
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Total	8294	7544	9240	6002	31080

5. Chronology: A description of the timeline or sequence of events that led to your noncompliance determination.

In July 2021 CTP received an Information Request from NHTSA relating to potential noncompliance of central adjuster webbing on the CYBEX Aton M (US) after being subject to hex bar abrasion tests. According to NHTSA, based on testing conducted by NHTSA at SGS North America Inc. as part of the FY 2020 compliance program, the central adjuster webbing retained only 56.9% of the new webbing strength. Section §5.4.1(a) of FMVSS No. 213 requires webbing used to secure a child to the child restraint to have a breaking strength after abrasion of not less than 75 percent of the new (unabraded) webbing strength.

From late July through September 2021 CTP worked with its supplier, Holmbergs, to investigate the possible noncompliance, including reviewing prior test results,[2] conducting additional testing pursuant to FMVSS 213, §5.4.1.2(b)(1) on retained webbing samples, and auditing the supplier's plant and test facilities.

FMVSS 213, §5.4.1.2(b)(1) provides two abrasion test options to satisfy webbing abrasion compliance requirements – a hex bar abrasion test as provided in FMVSS 209, §5.1(d) and a through-adjuster test as provided in FMVSS 209, §5.3(c). CTP instructed Holmbergs to complete both hex bar testing and through adjuster testing using samples retained from 2018 central adjuster webbing production that would have been used on the (US) Aton M as well as, current webbing being used in 2021.

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[1] In order to ensure continuous product improvement and to demonstrate its commitment to compliance and safety, CTP implemented an engineering change for webbing on October 25, 2021 to ensure that the webbing complies with hex bar and through adjuster abrasion requirements by a significant margin.

[2] CTP learned that Holmbergs did not have any historical test data for the hex bar or through- adjuster abrasion testing pursuant to FMVSS 213 §5.4.1.2(b)(1).

Data from Holmbergs' quality testing on batches of central adjuster assemblies to complete the analysis is provided and discussed in detail in Section 8. However, the results of the tests are noted briefly below.

The through-adjuster abraded webbing exceeded the required retained tensile breaking strength (>75% @ 2500 cycles) at 2500 cycles, 5000 cycles, 7500 cycles, and 10000 cycles (4x cycle requirement).

Hex bar abraded central adjuster webbing breaking strength from retained samples is on average 9506 N which equates to 64% of the new webbing breaking strength.

Based on these results, CTP conducted overload dynamic crash tests on CYBEX Aton M child restraints to understand the effects of hex bar abrasion on the central adjuster webbing crashworthiness, the child restraint's structural integrity, and occupant retention.

The crash test results showed that webbing crashworthiness, child restraint structural integrity, and occupant retention were maintained for child restraints assembled with hex-bar-abraded central adjuster webbing. In addition, the maximum central adjuster webbing load observed was 1014 N.

6. Cause: Description of what caused the noncompliance.

CTP, like other manufacturers, relies on its suppliers to self-certify compliance to certain standards and requirements. While CTP's supplier did not retain prior test records to demonstrate compliance with central adjuster abrasion requirements, Holmbergs (CTP's supplier) provided evidence of its internal procedures and control plans designed to ensure it satisfies all regulatory and/or manufacturer requirements. The procedures and controls are shown in the Control Plan and Production Part Approval Process (PPAP)[3] documents. CYBEX's / CTP's Quality Management System ("QMS") requires review and acceptance of the Holmbergs Control Plan and PPAP prior to Holmbergs supplying any components to CYBEX/CTP, including the harness assembly webbing for the Aton M. Additionally, the On-going Quality Control ("OQC") reports are evidence of on-going inspections and testing of the assemblies which demonstrates that Holmbergs was following the Aton M US Control Plan. The Control Plan, PPAP, and OQC documents were provided as exhibits to CTP's April 14, 2022 supplemental response letter to NHTSA.

Nonetheless, Holmbergs is now also maintaining records for all hex bar and/or through adjuster tests performed pursuant to FMVSS 213, §5.4.2.1(b)(1).

[3] The PAPP states that PPAP Submission meets all dimensional measurements, material and functional tests, appearance criteria, and contains the statistical process package. Additionally, it states that the results meet all drawing and specification requirements.

7. Safety Risks(s): identify and risks or warning associated with noncompliance.

There are no risks to child safety as a result of the inconsequential noncompliance to FMVSS 209, §5.1(d).

8. Justification: all data, views, arguments justifying granting the petition.

Available Test for Central Adjuster Webbing Abrasion Pursuant to FMVSS:

FMVSS 213 §5.4.1.2(b)(1) provides two alternative abrasion test options to satisfy central adjuster abrasion compliance requirements – a hex bar abrasion test as provided in FMVSS 209 § 5.1(d) and a through-adjuster test as provided in FMVSS 209 §5.3(c). CTP will separately address both test standards and review the test data to demonstrate that any noncompliance is inconsequential and does not pose any risk to child safety.

FMVSS 209 §5.3(c) through adjuster testing requirements outlines the test procedure as follows:

> The webbing shall be pulled **back and forth** through the buckle or manual adjusting device as shown schematically in Figure 7. The anchor end of the webbing (A) shall be attached to a mass (B) of 1.4 kg. The webbing shall pass through the buckle (C), and the other end (D) shall be attached to a **reciprocating device** so that the webbing forms an angle of 8° with the hinge stop (E). The reciprocating device shall be **operated for 2,500 cycles** at a rate of 18 cycles per minute with a stroke length of 203 mm. The abraded webbing shall be tested for breaking strength by the procedure described in paragraph §5.1(b). (*emphasis added*).

The through-adjuster test requirements are also generally demonstrated in a schematic. However, the schematic should be viewed only as a general visual aid to demonstrate the test procedure, and where the schematic appears to contradict the plain language of the FMVSS regulation, the words of the regulation should control. Here the plain language of FMVSS §5.3(c) explains that the webbing must be pulled back and forth through the buckle or manual adjusting device for 2500 cycles prior to testing the abraded webbing. Though the schematic that accompanies this language does not appear to explicitly show the buckle or adjusting device opening and closing, that action certainly must occur to meet the plain language and clear intent of the regulation. This plain reading of the of regulation comports with the real-world use of the central adjuster webbing as it is pulled back and forth through the central adjuster to tighten and loosen the webbing. Indeed, when NHTSA implemented the testing pursuant to FMVSS 209, §5.3(c) it made clear that this new test standard was implemented because "the hex-bar abrasion test does not adequately simulate the type of webbing abrasion caused by some buckles." Thus, it implemented the additional test noting that the "webbing is required to retain at least 75% of its breaking strength **after being repeatedly passed through the assembly buckle or manual adjustment device**." Fed. Reg.

Vol. 36, No 47, March 9, 1971 (emphasis added).[4] CTP believes that the through-adjuster abrasion test it used accurately exposes the central adjuster webbing to the abrading environment that exists in the application.

Retained Webbing Sample Through-Adjuster Test Results:
CTP's supplier performed the through adjuster test on retained webbing samples demonstrating that those samples are compliant with FMVSS 213, §5.4.1.2 (a) (209, §5.1(b)) *New Webbing Strength* and FMVSS 213, §5.4.1.2 (b) (209, §5.3(c)) *Through-adjuster Abraded Webbing Strength.* Specifically, Holmbergs cycled the webbing through a cam lock webbing adjuster that by the very nature, purpose, and intent of the test, had to open and close to permit the webbing to be "repeatedly passed through the adjustment device." (see schematic on right below).

FMVSS 209, S5.3(c)

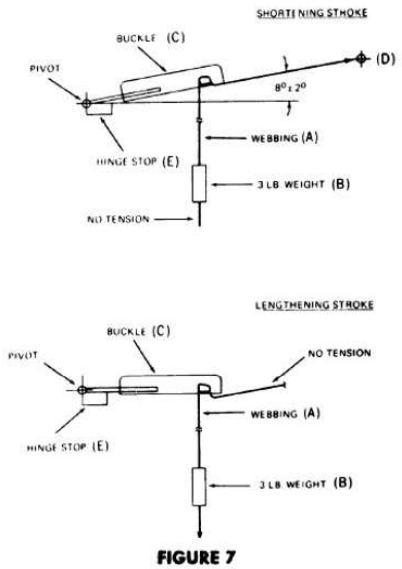
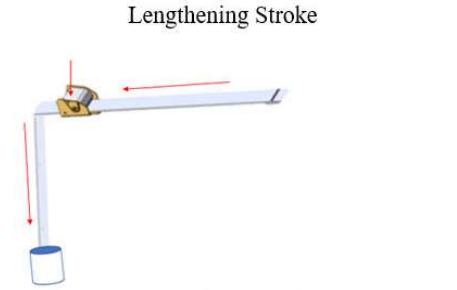


FIGURE 7



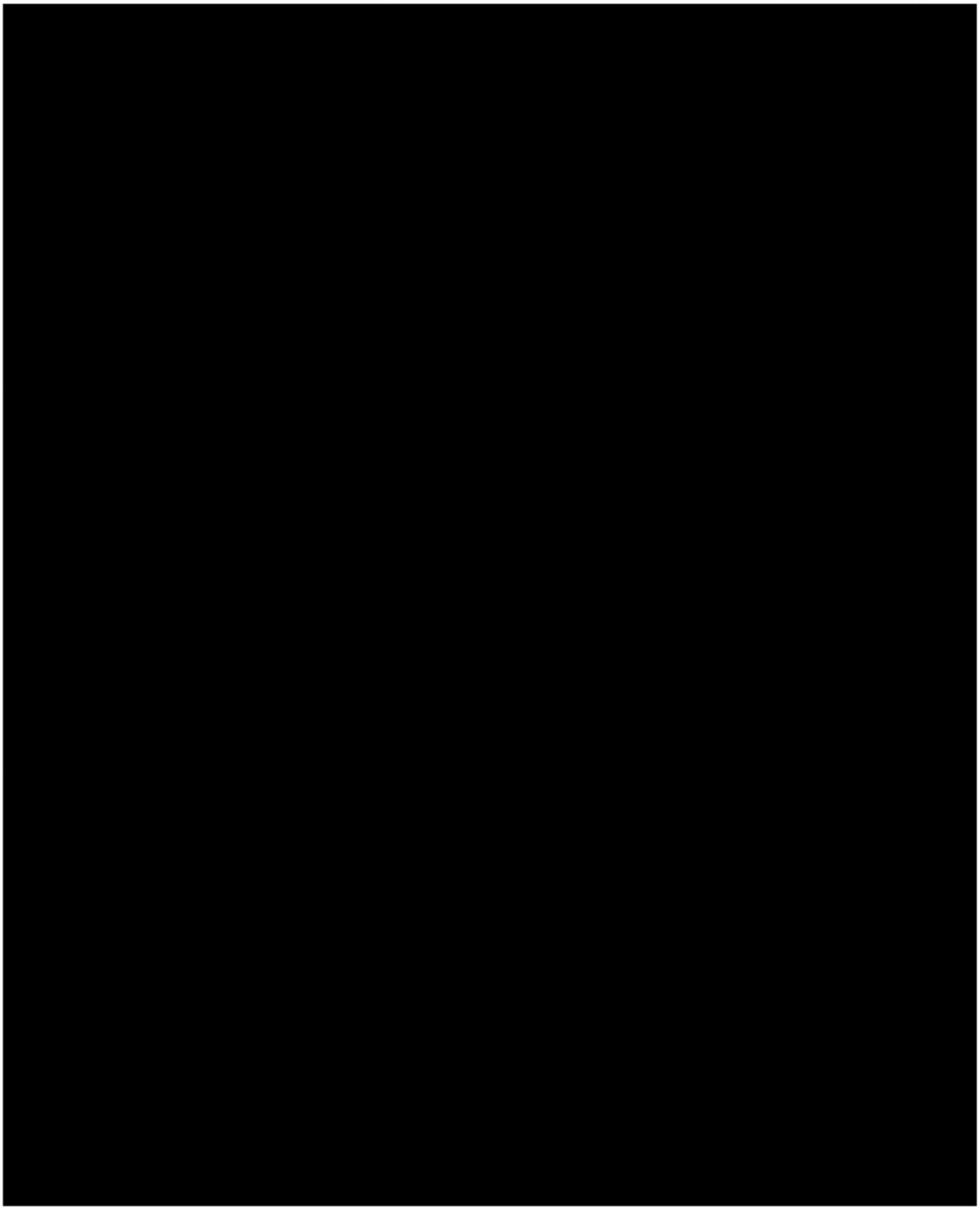
Cam lock must be opened during lengthening stroke or device will not allow webbing to move.

The through-adjuster abraded webbing exceeded the required retained tensile breaking strength (>75% @ 2500 cycles) at 2500 cycles, 5000 cycles, 7500 cycles, and 10000 cycles (that is, the test was performed at 4 times the cycle requirement and exceeded the required retained tensile strength). The test data and test

Methodology is set forth below in a table and schematic.[5]

4 The regulation has been amended numerous times since 1971 to account for technological changes and yet has retained both options for webbing abrasion. Thus, it is incorrect to interpret that the §5.3(c) only pertains to one specific form of buckle or adjusting device.

5 CTP worked with Holmbergs and MGA Research Corporation to investigate a variety of test conditions related to FMVSS 209, §5.3(c). Each condition tested maintained the angles, mass, and cycling characteristics of the schematic depicted in Figure 4 while only varying the amount and timing of the central adjuster cam opening. The conditions and results were previously discussed with NHTSA but in each case, the webbing exceeded the retained tensile strength of greater than 75% of the unabraded strength after 2500 cycles.



FMVSS 209, §5.1(d) hex bar testing requirements outlines the test procedure as follows:

> The webbing from three seat belt assemblies shall be tested for resistance to abrasion by rubbing over the hexagon bar prescribed in Figure 2 in the following manner: The webbing shall be mounted in the apparatus shown schematically in Figure 2. One end of the webbing (A) shall be attached to a mass (B) of 2.35 kg ±.05 kg, except that a mass of 1.5 kg ±.05 kg shall be used for webbing in pelvic and upper torso restraints of a belt assembly used in a child restraint system. The webbing shall be passed over the two new abrading edges of the hexagon bar (C) and the other end attached to an oscillating drum (D) which has a stroke of 330 mm. Suitable guides shall be used to prevent movement of the webbing along the axis of hexagonal bar C. Drum D shall be oscillated for 5,000 strokes or 2,500 cycles at a rate of 60 ±2 strokes per minute or 30 ±1 cycles per minute.

Notably, the critical testing results requirements following the hex bar abrasion are that the minimum new webbing breaking strength is greater than 11000 N (FMVSS 213, §5.4.1.2(a)) and that the hex abraded webbing breaking strength is greater than 75% of new webbing breaking strength (FMVSS 213, §5.4.1.2(b)). The hex bar abraded central adjuster webbing breaking strength from retained samples is on average 9506 N which equates to 64% of the new webbing breaking strength. The testing and results are discussed further below.

Retained Webbing Samples (Webbing Manufactured between 2017 – 2018)

The webbing that was retained at Holmbergs from four production batches of central adjuster webbing from batches in and around the webbing of the subject Aton M (US) was tested per the hex bar abrasion requirements. The table below contains the results of the hex bar abrasion tests. However, as discussed in Section 5 and also below, dynamic crash tests performed on Aton M (US) seats using the hex-bar abraded webbing demonstrate that there is a significant safety margin built into the central adjuster webbing in infant car seat applications (Aton M and similar) considering the abraded webbing retained strength. The maximum central adjuster webbing load measured in overload crash tests (1014 N) was 11% of the hex bar abraded breaking strength (9506 N)[6]. While the central adjuster webbing fails to meet the percent of unabraded strength requirement when abraded with the hex bar, the absolute strength before and after abrasion is more than sufficient for this application. Thus, the noncompliance is inconsequential to child safety.

[6] The crash severity required to generate central adjuster webbing loads that exceed 9500N would be such high energy that the crash would otherwise be not survivable.

Current Production Webbing (Webbing Manufactured in 2021)

Central adjuster webbing from two 2021 production batches was tested per the hex bar abrasion requirements. Table 1 below contains the results of the tests.

TABLE 1

The median new breaking strength is greater than 11000 N and the abraded breaking strength is greater than 75% of new breaking strength. Thus, central adjuster webbing from 2021 production is compliant with FMVSS 213 §5.4.1.2(a) new webbing and (b) hex bar abraded breaking strength.

Dynamic Crash Testing

CTP conducted overload dynamic crash tests on CYBEX Aton M child restraints to understand the effects of hex bar abrasion on the central adjuster webbing crashworthiness, the child restraint's structural integrity, and occupant retention. The basic dynamic crash testing protocol and specific test data are discussed below.[7]

[7] CYBEX conducts overload dynamic crash tests every 1250 child restraints built to verify that production variation is within limits. Since 2017, no central adjuster webbing or central adjuster assembly issues have been observed.

These dynamic crash test results indicate that there is a significant safety margin built into the central adjuster webbing in infant car seat applications (Aton M and similar) considering the abraded webbing retained strength. The maximum central adjuster webbing load (1014 N) measured in overload crash tests of the Aton M was 11% of the hex bar abraded breaking strength (9506 N)[8]. The difference between in-application strength requirement of the central adjuster webbing and the retrained strength of abraded webbing also show that significantly more degradation of strength could be tolerated. This additional margin would account for real-world factors above and beyond those accounted for in the hex bar abrasion testing of FMVSS 213. Furthermore, according to internal crash test data collected from a wide variety of test configurations including rearward- and forward-facing child restraints of multiple brands, ATDs up to and including the weighted 6-year-old (HIII-6CW), various attachments to test bench, and crash severities up to 64.4 km/h-30 g, the peak central adjuster strap load recorded was 4745 N. This broad data also supports the assertion that a significant safety margin exists for the central adjuster webbing. In an infant car seat the crash severity required to generate central adjuster webbing loads that exceed 9500 N in this application would be such high energy that the crash would not be survivable. While the central adjuster webbing fails to meet the percent of unabraded strength requirement when abraded with the hex bar, the absolute strength before and after abrasion is more than sufficient for this application. Thus, the noncompliance is inconsequential to child safety.

9. Actions: steps taken since noncompliance was determined.

Prior to a noncompliance determination, in an abundance of caution and commitment to continuous product improvement, CTP implemented replacement central adjuster webbing to ensure that the webbing strictly complies with abrasion test requirements. The replacement webbing has been subject to both hex bar and adjuster testing and complies with all retained tensile strength requirements. (These test procedures and results are discussed in the preceding section).

After a full investigation, CTP now files this petition for an exemption from the recall requirements of Chapter 301 of Title 49 U.S.C. on the basis that the noncompliance is inconsequential as it relates to child safety.

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[8] Factors such as test-to-test variation and dynamic versus quasi-static loading are important to consider but would not change the conclusion that the maximum central adjuster load is far less than the abraded breaking strength of this webbing.

10. Conclusion:

CTP has conducted a thorough review of the central adjuster webbing abrasion requirements contained in FMVSS 213 and 209, internal data, and the test data for through-adjuster and hex bar tests performed on retained webbing performed by its supplier. After being subjected to through-adjuster testing as specified in the plain language of the regulation, which is both consistent with real-world use and NHTSA's explanation for implementing the through-adjuster test, the central adjuster webbing meets and exceeds the retained tensile strength even after being subjected to cycle testing performed at four times the required test cycles. Even if the through-adjuster testing does not conform to a strict interpretation of the schematic that accompanies the language of the regulation, that nonconformance is inconsequential, as the language of the regulation, as well as the stated purpose of the regulation, should control the test methodology employed. CTP has demonstrated that the test performed by its supplier meets the language of the regulation, the stated purpose of the regulation, and the real-world application of the central adjuster webbing in child restraints. Therefore, CTP respectfully submits that if the through adjuster test deviates from the schematic in FMVSS 209, §5.3(c), the deviation is an inconsequential noncompliance and CTP requests an exemption from NHTSA.

Likewise, the results of the hex bar testing demonstrate an inconsequential noncompliance. The hex bar testing of the retained samples of the webbing used in the Aton M yielded retained webbing strength of 9506 N. CTP asserts that the retained strength is sufficient for this application because dynamic crash test data shows that the measured webbing loads experienced in severe overload conditions were only a small fraction (11%) of the abraded retained strength of the central adjuster webbing. These dynamic crash tests also showed that structural integrity of the child restraint was maintained, and that the occupant was retained in a severe crash in the child restraints with hex bar abraded webbing. As such, CTP respectfully requests that NHTSA find any noncompliance with this standard is inconsequential to child safety and CTP requests an exemption from NHTSA.

Jessica L. S. Kimes
General Counsel

Goodbaby International

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Columbus Trading-Partners USA, Inc.
225 Byers Rd.
Miamisburg, Ohio 45342
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Via eMail

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Office of Vehicle Safety Compliance
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1200 New Jersey Avenue SE
Washington, DC 20590
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Please call me if you require additional information. My direct dial telephone number is (937) 305-9310. If you prefer to email, my email address is Jessica.kimes@goodbabyint.com. Thank you for your time and attention to this matter.

Sincerely,

DocuSigned by:
Jessica L. S. Kimes
EA0AE34E0DE74C3...

Jessica L. S. Kimes
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AMENDED PETITION FOR DETERMINATON OF INCONSEQUENTIAL NONCOMPLIANCE

1. Manufacturer Identification: The full name and address of the applicant, the nature of its organization, and the name of the state or country under the law of which it is organized.

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Nonetheless, Holmbergs is now also maintaining records for all hex bar and/or through adjuster tests performed pursuant to FMVSS 213, §5.4.2.1(b)(1).

7. Safety Risks(s): identify and risks or warning associated with noncompliance.

There are no risks to child safety as a result of the inconsequential noncompliance to FMVSS 209, §5.1(d).

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[3] The PAPP states that PPAP Submission meets all dimensional measurements, material and functional tests, appearance criteria, and contains the statistical process package. Additionally, it states that the results meet all drawing and specification requirements.

8. Justification: all data, views, arguments justifying granting the petition.

Available Test for Central Adjuster Webbing Abrasion Pursuant to FMVSS:

FMVSS 213 §5.4.1.2(b)(1) provides two alternative abrasion test options to satisfy central adjuster abrasion compliance requirements – a hex bar abrasion test as provided in FMVSS 209 § 5.1(d) and a through-adjuster test as provided in FMVSS 209 §5.3(c). CTP will separately address both test standards and review the test data to demonstrate that any noncompliance is inconsequential and does not pose any risk to child safety.

FMVSS 209 §5.3(c) through adjuster testing requirements outlines the test procedure as follows:

> The webbing shall be pulled **back and forth** through the buckle or manual adjusting device as shown schematically in Figure 7. The anchor end of the webbing (A) shall be attached to a mass (B) of 1.4 kg. The webbing shall pass through the buckle (C), and the other end (D) shall be attached to a **reciprocating device** so that the webbing forms an angle of 8° with the hinge stop (E). The reciprocating device shall be **operated for 2,500 cycles** at a rate of 18 cycles per minute with a stroke length of 203 mm. The abraded webbing shall be tested for breaking strength by the procedure described in paragraph §5.1(b). (*emphasis added*).

The through-adjuster test requirements are also generally demonstrated in a schematic. However, the schematic should be viewed only as a general visual aid to demonstrate the test procedure, and where the schematic appears to contradict the plain language of the FMVSS regulation, the words of the regulation should control. Here the plain language of FMVSS §5.3(c) explains that the webbing must be pulled back and forth through the buckle or manual adjusting device for 2500 cycles prior to testing the abraded webbing. Though the schematic that accompanies this language does not appear to explicitly show the buckle or adjusting device opening and closing, that action certainly must occur to meet the plain language and clear intent of the regulation. This plain reading of the of regulation comports with the real-world use of the central adjuster webbing as it is pulled back and forth through the central adjuster to tighten and loosen the webbing. Indeed, when NHTSA implemented the testing pursuant to FMVSS 209, §5.3(c) it made clear that this new test standard was implemented because "the hex-bar abrasion test does not adequately simulate the type of webbing abrasion caused by some buckles." Thus, it implemented the additional test noting that the "webbing is required to retain at least 75% of its breaking strength **after being repeatedly passed through the assembly buckle or manual adjustment device**." Fed. Reg. Vol. 36, No 47, March 9, 1971 (emphasis added).[4] Finally, it is notable that

4 The regulation has been amended numerous times since 1971 to account for technological changes and yet has retained both options for webbing abrasion. Thus, it is incorrect to interpret that the §5.3(c) only pertains to one specific form of buckle or adjusting device.

NHTSA's Laboratory Test Procedure for FMVSS 209 Seat Belt Assemblies dated December 7, 2007, specifies that for webbing resistance to abrasion tests performed pursuant to FMVSS §4.2(d), 5.1(d), and 5.3(c) the assembly "***shall*** be subjected to the buckle abrasion test" if the "assembly contain a manual adjusting device" (emphasis added). CTP believes that the through-adjuster abrasion test it used accurately exposes the central adjuster webbing to the abrading environment that exists in the application.

Retained Webbing Sample Through-Adjuster Test Results:
CTP's supplier performed the through adjuster test on retained webbing samples demonstrating that those samples are compliant with FMVSS 213, §5.4.1.2 (a) (209, §5.1(b)) *New Webbing Strength* and FMVSS 213, §5.4.1.2 (b) (209, §5.3(c)) *Through-adjuster Abraded Webbing Strength.* Specifically, Holmbergs cycled the webbing through a cam lock webbing adjuster that by the very nature, purpose, and intent of the test, had to open and close to permit the webbing to be "repeatedly passed through the adjustment device." (see schematic on right below).

FMVSS 209, S5.3(c)

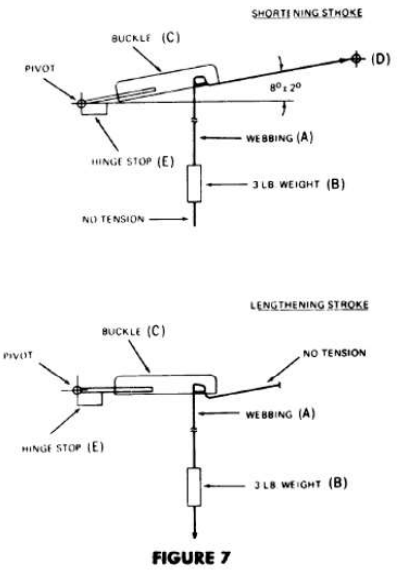
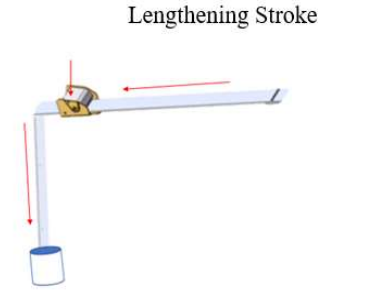


FIGURE 7



Cam lock must be opened during lengthening stroke or device will not allow webbing to move.

The through-adjuster abraded webbing exceeded the required retained tensile breaking strength (>75% @ 2500 cycles) at 2500 cycles, 5000 cycles, 7500 cycles, and 10000 cycles (that is, the test was performed at 4 times the cycle requirement and exceeded the required retained tensile strength). The test data and test

Methodology is set forth below in a table and schematic.[5]

[5] CTP worked with Holmbergs and MGA Research Corporation to investigate a variety of test conditions related to FMVSS 209, §5.3(c). Each condition tested maintained the angles, mass, and cycling characteristics of the schematic depicted in Figure 4 while only varying the amount and timing of the central adjuster cam opening. The conditions and results were previously discussed with NHTSA but in each case, the webbing exceeded the retained tensile strength of greater than 75% of the unabraded strength after 2500 cycles.

INTERNAL TESTING (Central Front Adjuster Abrasion/Cycle Test) (S209, S5.3(c))

- Tensile Pre-CFA cycling
- Tensile Post-CFA Cycling

Adjuster abrasion test				
Sample	**Aton M retained Webbing**	**Tensile value Pre-abrasion (N)**	**Post-abrasion 2.5K cycle (N)**	**Retention (≥75%) (%)**
1	MBG 54-9344-01 Batch: 14/45-18	15252	15290	100.2%
2		15393	14483	94.1%
			Post-abrasion 5K cycle (N)	**Retention (≥75%) (%)**
			15253	100.0%
			14473	94.0%
			Post-abrasion 7.5K cycle (N)	**Retention (≥75%) (%)**
			14346	94.1%
			14643	95.1%
			Post-abrasion 10K cycle (N)	**Retention (≥75%) (%)**
			13245	86.8%
			14276	92.7%

Test utilized retain assemblies from Batch 14/45-18. Batch 14/45-18 is 1 of 4 used on Aton M and currently have most samples left available to perform evaluation.
Results reflect webbing only in straight tensile pull test.

- While not required, Holmbergs will test to 10k cycles to resemble a child restraint system being used 4.5 times per day for 6 years.
- Even after 10k cycles, the webbing remains significantly higher in performance than the target.

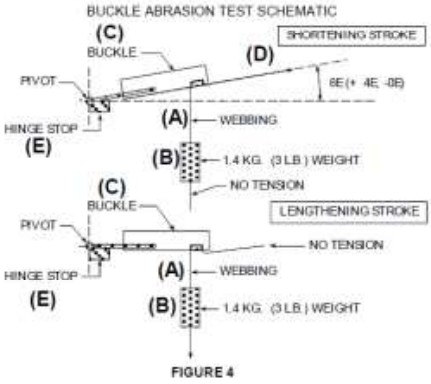


FIGURE 4

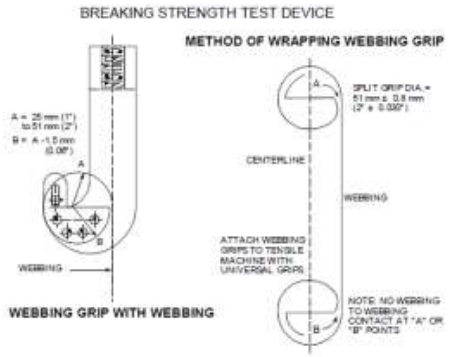


FIGURE 2

FMVSS 209, §5.1(d) hex bar testing requirements outlines the test procedure as follows:

The webbing from three seat belt assemblies shall be tested for resistance to abrasion by rubbing over the hexagon bar prescribed in Figure 2 in the following manner: The webbing shall be mounted in the apparatus shown schematically in Figure 2. One end of the webbing (A) shall be attached to a mass (B) of 2.35 kg ±.05 kg, except that a mass of 1.5 kg ±.05 kg shall be used for webbing in pelvic and upper torso restraints of a belt assembly used in a child restraint system. The webbing shall be passed over the two new abrading edges of the hexagon bar (C) and the other end attached to

> an oscillating drum (D) which has a stroke of 330 mm. Suitable guides shall be used to prevent movement of the webbing along the axis of hexagonal bar C. Drum D shall be oscillated for 5,000 strokes or 2,500 cycles at a rate of 60 ±2 strokes per minute or 30 ±1 cycles per minute.

Notably, the critical testing results requirements following the hex bar abrasion are that the minimum new webbing breaking strength is greater than 11000 N (FMVSS 213, §5.4.1.2(a)) and that the hex abraded webbing breaking strength is greater than 75% of new webbing breaking strength (FMVSS 213, §5.4.1.2(b)). The hex bar abraded central adjuster webbing breaking strength from retained samples is on average 9506 N which equates to 64% of the new webbing breaking strength. The testing and results are discussed further below.

Retained Webbing Samples (Webbing Manufactured between 2017 – 2018)

The webbing that was retained at Holmbergs from four production batches of central adjuster webbing from batches in and around the webbing of the subject Aton M (US) was tested per the hex bar abrasion requirements. The table below contains the results of the hex bar abrasion tests. However, as discussed in Section 5 and also below, dynamic crash tests performed on Aton M (US) seats using the hex-bar abraded webbing demonstrate that there is a significant safety margin built into the central adjuster webbing in infant car seat applications (Aton M and similar) considering the abraded webbing retained strength. The maximum central adjuster webbing load measured in overload crash tests (1014 N) was 11% of the hex bar abraded breaking strength (9506 N)[6]. While the central adjuster webbing fails to meet the percent of unabraded strength requirement when abraded with the hex bar, the absolute strength before and after abrasion is more than sufficient for this application. Thus, the noncompliance is inconsequential to child safety.

[6] The crash severity required to generate central adjuster webbing loads that exceed 9500N would be such high energy that the crash would otherwise be not survivable.

HEX-BAR ABRASION TESTS RESULTS (performed Sept 2021), FMVSS213. S.5.4.1.2(b)

FMVSS 213 Test_ 3rd Party Testing (Resistance to abrasion)					
Tested 3rd Party	3	18/34-17	55.4.1.2 (a)	55.4.1.2 (b)	
Test Utilized retain Aton M samples from Batch Noted.		Retain 1	14,187	8,519	61.0%
		Retain 2	14,164	9,820	
		Retain 3	14,806	8,655	
		Median	14,187	8,655	
Tested 3rd Party	4	25/38-17	55.4.1.2 (a)	55.4.1.2 (b)	
Test Utilized retain Aton M samples from Batch Noted.		Retain 1	14,541	9,093	66.17%
		Retain 2	14,380	9,619	
		Retain 3	14,536	10,003	
		Median	14,536	9,619	
Tested 3rd Party	5	14/45-18,	55.4.1.2 (a)	55.4.1.2 (b)	
Test Utilized retain Aton M samples from Batch Noted.		Retain 1	15,487	9,581	63.18%
		Retain 2	15,412	9,978	
		Retain 3	15,360	9,738	
		Median	15,412	9,738	
Tested 3rd Party	6	49/54-18	55.4.1.2 (a)	55.4.1.2 (b)	
Test Utilized retain Aton M samples from Batch Noted.		Retain 1	15,296	10,007	65.66%
		Retain 2	15,251	10,014	
		Retain 3	15,007	10,124	
		Median	15,251	10,014	

Current Production Webbing (Webbing Manufactured in 2021)

Central adjuster webbing from two 2021 production batches was tested per the hex bar abrasion requirements. Table 1 below contains the results of the tests.

TABLE 1

HEX-BAR ABRASION TESTS RESULTS (performed Sept 2021), FMVSS213. S.5.4.1.2(b)

FMVSS 213 Test_ 3rd Party Testing (Resistance to abrasion)					
Hex-bar Test	**Item**	**Batch**	**Pre-Abrasion Tensile (N)**	**Post-Abrasion Tensile (N)**	**Retention (%)**
3rd Party Lab	1	07/90-21	S5.4.1.2 (a)	S5.4.1.2 (b)	
New Web. Most recent produced for Holmbergs Manufacturing		Item 1	15,174	11,803	76.89%
		Item 2	15,518	13,803	
		Item 3	15,546	11,932	
		Median	15,518	11,932	
Manufacturer lab	2	New	S5.4.1.2 (a)	S5.4.1.2 (b)	
Webbing produced upon our request from the mill.		Item 1	15,666	12,111	77.31%
		Item 2	15,580	12,188	
		Item 3	15,672	11,716	
		Median	15,666	12,111	

The median new breaking strength is greater than 11000 N and the abraded breaking strength is greater than 75% of new breaking strength. Thus, central adjuster webbing from 2021 production is compliant with FMVSS 213 §5.4.1.2(a) new webbing and (b) hex bar abraded breaking strength.

Dynamic Crash Testing

CTP conducted overload dynamic crash tests on CYBEX Aton M child restraints to understand the effects of hex bar abrasion on the central adjuster webbing crashworthiness, the child restraint's structural integrity, and occupant retention. The basic dynamic crash testing protocol and specific test data are discussed below.[7]

> Retained central adjuster webbing was abraded according to the FMVSS 209, §5.1(d) hex bar abrasion test protocol.
>
> CYBEX Aton M child restraints were assembled with the abraded webbing and were crash-tested at 56 km/h, 30g using FMVSS 213 test bench and foam:

[7] CYBEX conducts overload dynamic crash tests every 1250 child restraints built to verify that production variation is within limits. Since 2017, no central adjuster webbing or central adjuster assembly issues have been observed.

Configuration 1: Seat + Base, HIII-3YO ATD (Anthropomorphic Test Device), Type 1 installation
Result: central adjuster webbing peak load = 742 N, 3 mm central adjuster webbing cam-in to lock (no slip), webbing intact post-crash, child restraint structural integrity maintained, ATD retained.

Configuration 2: Seat + Base, HIII-3YO ATD, lower connector installation
Result: Central Adjuster webbing peak load = 1014 N, 3 mm central adjuster webbing cam-in to lock (no slip), webbing intact post-crash, child restraint structural integrity maintained, ATD retained.

Webbing crashworthiness, child restraint structural integrity, and occupant retention were maintained for child restraints assembled with hex-bar-abraded central adjuster webbing. In addition, the maximum central adjuster webbing load observed was 1014 N.

These dynamic crash test results indicate that there is a significant safety margin built into the central adjuster webbing in infant car seat applications (Aton M and similar) considering the abraded webbing retained strength. The maximum central adjuster webbing load (1014 N) measured in overload crash tests of the Aton M was 11% of the hex bar abraded breaking strength (9506 N)[8]. The difference between in-application strength requirement of the central adjuster webbing and the retrained strength of abraded webbing also show that significantly more degradation of strength could be tolerated. This additional margin would account for real-world factors above and beyond those accounted for in the hex bar abrasion testing of FMVSS 213. Furthermore, according to internal crash test data collected from a wide variety of test configurations including rearward- and forward-facing child restraints of multiple brands, ATDs up to and including the weighted 6-year-old (HIII-6CW), various attachments to test bench, and crash severities up to 64.4 km/h-30 g, the peak central adjuster strap load recorded was 4745 N. This broad data also supports the assertion that a significant safety margin exists for the central adjuster webbing. In an infant car seat the crash severity required to generate central adjuster webbing loads that exceed 9500 N in this application would be such high energy that the crash would not be survivable. While the central adjuster webbing fails to meet the percent of unabraded strength requirement when abraded with the hex bar, the absolute strength before and after abrasion is more than sufficient for this application. Thus, the noncompliance is inconsequential to child safety.

9. Actions: steps taken since noncompliance was determined.

Prior to a noncompliance determination, in an abundance of caution and commitment to continuous product improvement, CTP implemented replacement central adjuster webbing on new child restraints manufactured beginning October 27, 2021, and clarified product specifications provided to its webbing supplier requiring that the webbing satisfy both the hexbar and through adjuster tests to ensure that the webbing strictly complies with abrasion

[8] Factors such as test-to-test variation and dynamic versus quasi-static loading are important to consider but would not change the conclusion that the maximum central adjuster load is far less than the abraded breaking strength of this webbing.

test requirements.[9] The replacement webbing has been subject to both hex bar and through adjuster testing and complies with all retained tensile strength requirements. (These test procedures and results are discussed in the preceding section).

After a full investigation, CTP now files this petition for an exemption from the recall requirements of Chapter 301 of Title 49 U.S.C. on the basis that the noncompliance is inconsequential as it relates to child safety.

10. Conclusion:

CTP has conducted a thorough review of the central adjuster webbing abrasion requirements contained in FMVSS 213 and 209, internal data, and the test data for through-adjuster and hex bar tests performed on retained webbing performed by its supplier. After being subjected to through-adjuster testing as specified in the plain language of the regulation, which is consistent with real-world use, NHTSA's explanation for implementing the through-adjuster test, and the test requirements NHTSA provides to its testing labs, the central adjuster webbing meets and exceeds the retained tensile strength even after being subjected to cycle testing performed at four times the required test cycles. Even if the through-adjuster testing does not conform to a strict interpretation of the schematic that accompanies the language of the regulation, that nonconformance is inconsequential, as the language of the regulation, as well as the stated purpose of the regulation, should control the test methodology employed. CTP has demonstrated that the test performed by its supplier meets the language of the regulation, the stated purpose of the regulation, and the real-world application of the central adjuster webbing in child restraints. Therefore, CTP respectfully submits that if the through adjuster test deviates from the schematic in FMVSS 209, §5.3(c), the deviation is an inconsequential noncompliance and CTP requests an exemption from NHTSA.

Likewise, the results of the hex bar testing demonstrate an inconsequential noncompliance. The hex bar testing of the retained samples of the webbing used in the Aton M yielded retained webbing strength of 9506 N. CTP asserts that the retained strength is sufficient for this application because dynamic crash test data shows that the measured webbing loads experienced in severe overload conditions were only a small fraction (11%) of the abraded retained strength of the central adjuster webbing. These dynamic crash tests also showed that structural integrity of the child restraint was maintained, and that the occupant was retained in a severe crash in the child restraints with hex bar abraded webbing. As such, CTP respectfully requests that NHTSA find any noncompliance with this standard is inconsequential to child safety and CTP requests an exemption from NHTSA.

[9] Previously CPT's specifications stated that the webbing must comply with the requirements of FMVSS 213. To add further specificity and rigor, CTP clarified that supplied webbing must comply with both available, alternative abrasion tests.

Part 573 Safety Recall Report 22C-005

Manufacturer Name : Columbus Trading-Partners USA, Inc.
Submission Date : JUN 30, 2022
NHTSA Recall No. : 22C-005
Manufacturer Recall No. : NR

Manufacturer Information :

Manufacturer Name : Columbus Trading-Partners USA, Inc.
Address : 225 Byers Road
Miamisburg OH 45342
Company phone : 937-415-3215

Population :

Number of potentially involved : 31,080
Estimated percentage with defect : NR

Child Restraint Information :

Make 1 : Aton
Model : M
Seat Type : NR
Model No. : 518002089
Platform Name / No. : NR
Brand Name : NR
Descriptive Information : NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application.
The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton M child restraints manufactured in this time period is 6372.
Production Dates : MAR 07, 2017 - NOV 01, 2020

Make 2 :	Aton
Model :	M
Seat Type :	NR
Model No. :	518002091
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton M child restraints manufactured in this time period is 6372.
Production Dates :	MAR 07, 2017 - NOV 01, 2020

Make 3 :	Aton
Model :	M
Seat Type :	NR
Model No. :	518002093
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton M child restraints manufactured in this time period is 6372.
Production Dates :	MAR 07, 2018 - NOV 01, 2020

Make 4 :	Aton
Model :	M
Seat Type :	NR
Model No. :	518002095
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton M child restraints manufactured in this time period is 6372.
Production Dates :	MAR 07, 2018 - NOV 01, 2020

Make 5 :	Aton
Model :	M
Seat Type :	NR
Model No. :	518002097
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton M child restraints manufactured in this time period is 6372.
Production Dates :	MAR 07, 2018 - NOV 01, 2020

Make 6 :	Aton
Model :	M
Seat Type :	NR
Model No. :	518002099
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton M child restraints manufactured in this time period is 6372.
Production Dates :	MAR 07, 2018 - NOV 01, 2020

Make 7 :	Aton
Model :	M
Seat Type :	NR
Model No. :	518002101
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton M child restraints manufactured in this time period is 6372.
Production Dates :	MAR 07, 2018 - NOV 01, 2020

Make 8 :	Aton
Model :	M
Seat Type :	NR
Model No. :	518002859
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton M child restraints manufactured in this time period is 6372.
Production Dates :	MAR 07, 2018 - NOV 01, 2020

Make 9 :	Aton
Model :	M
Seat Type :	NR
Model No. :	518002863
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton M child restraints manufactured in this time period is 6372.
Production Dates :	MAR 07, 2018 - NOV 01, 2020

Make 10 :	Aton
Model :	M
Seat Type :	NR
Model No. :	518002865
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton M child restraints manufactured in this time period is 6372.
Production Dates :	MAR 07, 2018 - NOV 01, 2020

Make 11 :	Aton
Model :	M
Seat Type :	NR
Model No. :	518002865
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton M child restraints manufactured in this time period is 6372.
Production Dates :	MAR 07, 2018 - NOV 01, 2020

Make 12 :	Aton
Model :	M
Seat Type :	NR
Model No. :	518002867
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton M child restraints manufactured in this time period is 6372.
Production Dates :	MAR 07, 2018 - NOV 01, 2020

Make 13 :	Aton
Model :	2
Seat Type :	NR
Model No. :	514104055
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 14 :	Aton
Model :	2
Seat Type :	NR
Model No. :	514104057
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 15 :	Aton
Model :	2
Seat Type :	NR
Model No. :	515103011
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 16 :	Aton
Model :	2
Seat Type :	NR
Model No. :	515103003
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 17 :	Aton
Model :	2
Seat Type :	NR
Model No. :	515103003
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 18 :	Aton
Model :	2
Seat Type :	NR
Model No. :	515103005
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 19 :	Aton
Model :	2
Seat Type :	NR
Model No. :	515103007
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 20 :	Aton
Model :	2
Seat Type :	NR
Model No. :	515103009
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 21 :	Aton
Model :	2
Seat Type :	NR
Model No. :	515103011
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 22 :	Aton
Model :	2
Seat Type :	NR
Model No. :	515103013
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 23 :	Aton
Model :	2
Seat Type :	NR
Model No. :	515103015
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 24 :	Aton
Model :	2
Seat Type :	NR
Model No. :	515103017
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 25 :	Aton
Model :	2
Seat Type :	NR
Model No. :	515103019
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 26 :	Aton
Model :	2
Seat Type :	NR
Model No. :	518000183
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 27 :	Aton
Model :	2
Seat Type :	REARFACING INFANT SEAT
Model No. :	518000185
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 28 :	Aton
Model :	2
Seat Type :	REARFACING INFANT SEAT
Model No. :	518000187
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 29 :	Aton
Model :	2
Seat Type :	NR
Model No. :	518000191
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 30 :	Aton
Model :	2
Seat Type :	NR
Model No. :	518000193
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 31 :	Aton
Model :	2
Seat Type :	NR
Model No. :	518000195
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 32 :	Aton
Model :	2
Seat Type :	NR
Model No. :	519003597
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 33 :	Aton
Model :	2
Seat Type :	NR
Model No. :	519003599
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 34 :	Aton
Model :	2
Seat Type :	NR
Model No. :	519003601
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 35 :	Aton
Model :	2
Seat Type :	NR
Model No. :	519003603
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 36 :	Aton
Model :	2
Seat Type :	NR
Model No. :	519003605
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 37 :	Aton
Model :	2
Seat Type :	NR
Model No. :	519003607
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 38 :	Aton
Model :	2
Seat Type :	NR
Model No. :	519003609
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 39 :	Aton
Model :	2
Seat Type :	NR
Model No. :	519003595
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 40 :	Aton
Model :	2
Seat Type :	NR
Model No. :	519003597
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 41 :	Aton
Model :	2
Seat Type :	NR
Model No. :	519003599
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 42 :	Aton
Model :	2
Seat Type :	NR
Model No. :	519003601
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 43 :	Aton
Model :	2
Seat Type :	NR
Model No. :	519003603
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 44 :	Aton
Model :	2
Seat Type :	REARFACING INFANT SEAT
Model No. :	519003607
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 213, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.2.1(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 45 :	Aton
Model :	2
Seat Type :	NR
Model No. :	519003609
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton 2 child restraints manufactured in this time period is 10,539.
Production Dates :	MAR 29, 2017 - OCT 27, 2020

Make 46 :	Aton
Model :	Aton
Seat Type :	NR
Model No. :	514104041
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton child restraints manufactured in this time period is 1017.
Production Dates :	MAR 29, 2017 - JAN 04, 2020

Make 47 :	Aton
Model :	Aton
Seat Type :	NR
Model No. :	514104042
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton child restraints manufactured in this time period is 1017.
Production Dates :	MAR 29, 2017 - JAN 04, 2020

Make 48 :	Aton
Model :	Aton
Seat Type :	NR
Model No. :	514104043
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton child restraints manufactured in this time period is 1017.
Production Dates :	MAR 29, 2017 - JAN 04, 2020

Make 49 :	Aton
Model :	Aton
Seat Type :	NR
Model No. :	514104044
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton child restraints manufactured in this time period is 1017.
Production Dates :	MAR 29, 2017 - JAN 04, 2020

Make 50 :	Aton
Model :	Aton
Seat Type :	NR
Model No. :	514104045
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton child restraints manufactured in this time period is 1017.
Production Dates :	MAR 29, 2017 - JAN 04, 2020

Make 51 :	Aton
Model :	Aton
Seat Type :	NR
Model No. :	514104046
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton child restraints manufactured in this time period is 1017.
Production Dates :	MAR 29, 2017 - JAN 04, 2020

Make 52 :	Aton
Model :	Aton
Seat Type :	NR
Model No. :	514104052
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton child restraints manufactured in this time period is 1017.
Production Dates :	MAR 29, 2017 - JAN 04, 2020

Make 53 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	514104190
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 54 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	514104192
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 55 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	514104193
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 56 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	514104196
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 57 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	514014197
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 58 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	515104283
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 59 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	515104284
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 60 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	515104285
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 61 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	515104286
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 62 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	515104287
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 63 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	515104288
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 64 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	515104289
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 65 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	515104290
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 66 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	515104291
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 67 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	515104292
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 68 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	515104294
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 69 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	515104293
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 70 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	515104295
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 71 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	515104296
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 72 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	515104298
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 73 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	515104309
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 74 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	517001703
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 75 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	517001707
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 76 :	Aton
Model :	Q
Seat Type :	NR
Model No. :	517001709
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Aton Q child restraints manufactured in this time period is 8730.
Production Dates :	MAR 13, 2017 - JAN 03, 2020

Make 77 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	515140105
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 78 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	515140106
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 79 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	515140107
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 07, 2017 - OCT 20, 2020

Make 80 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	515170108
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 81 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	515140109
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 82 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	515170109
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 83 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	515140110
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 84 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	515140111
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 85 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	515140112
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 86 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	515140113
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 87 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	515140114
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 88 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	515140115
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 89 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	515140116
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 90 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	515140117
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 91 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	515140118
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 92 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	515140119
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 93 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	515140120
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 94 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	515140121
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 95 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517001039
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 96 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517001047
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 97 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517001049
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 98 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517001053
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 99 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517001055
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 100 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517001057
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 101 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517901718
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 102 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517901722
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 103 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517901723
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 104 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517901724
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 105 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517901725
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 106 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517901726
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 107 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517901727
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 108 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517901728
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 109 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517901729
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 110 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517901730
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 111 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517901731
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 112 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517901732
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 113 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517901733
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 114 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517901734
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 115 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517901735
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 116 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517901735
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 117 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	517001047
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 118 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	519003169
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 119 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	519000013
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 120 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	519000015
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Make 121 :	Cloud
Model :	Q
Seat Type :	NR
Model No. :	519000137
Platform Name / No. :	NR
Brand Name :	NR
Descriptive Information :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 209, §5.1 (d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.1.2(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application. The first date any seats were manufactured with this lot of webbing was March 7, 2018. CTP received a Final Report No. 4807558-024 dated January 14, 2022 verifying that the webbing for seats manufactured in 2021 is compliant to FMVSS S5.4.1.2(b)(1). The total number of Cloud Q child restraints manufactured in this time period is 8730.
Production Dates :	JUL 06, 2017 - OCT 20, 2020

Description of Noncompliance :

Description of the Noncompliance :	NHTSA sent a letter to CTP indicating that the central adjuster webbing used in CYBEX Aton M (US) child restraints retained only 56.9% of the new webbing strength following the hex bar abrasion test provided for in FMVSS No. 213, §5.1(d). CTP provided data and details of test methods for abrasion testing of the central adjuster webbing used in the Aton M child restraint pursuant to FMVSS No. 209, §5.3(c), the through-adjuster test, an alternative webbing abrasion test method provided by FMVSS No. 213, §5.4.2.1(b)(1). Despite the webbing meeting the post-abrasion strength requirements of the through-adjuster tests, NHTSA concluded that the through-adjuster test methods used were not an appropriate interpretation of FMVSS No. 209, §5.3(c), and thus that its initial assertion of noncompliance is valid. CTP acknowledges this assertion that the central adjuster webbing is noncompliant based on the through-adjuster test methodology employed, yet respectfully petitions NHTSA to find that any noncompliance is inconsequential to child safety. Further, with regard to test results pursuant to FMVSS No. 209, §5.1(d), the hex bar test, CTP believes that those results also demonstrate noncompliance that is inconsequential to child safety in an infant child restraint (rearward facing only) application.
FMVSS 1 :	213 - Child restraint systems
FMVSS 2 :	209 - Seat belt assemblies
Description of the Safety Risk :	No risk to child passenger safety exists.
Description of the Cause :	NR
Identification of Any Warning that can Occur :	NR

Involved Components :

Component Name :	Harness
Component Description :	Central Adjuster Webbing
Component Part Number :	40-1823-XX; 40-9911-1X; 40-9911-xx; 40-1443-xx; 40-1412-xx

Supplier Identification :

Component Manufacturer

Name :	Holmbergs Safety Systems Co., Ltd.
Address :	5985 West Main Street Kalamazoo Michigan 49009

Country : United States

Chronology :

NR

Description of Remedy :

Description of Remedy Program :	NR
How Remedy Component Differs from Recalled Component :	NR
Identify How/When Recall Condition was Corrected in Production :	NR

Recall Schedule :

Description of Recall Schedule :	NR
Planned Dealer Notification Date :	NR - NR
Planned Owner Notification Date :	NR - NR

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