



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

1200 New Jersey Avenue SE  
Washington, DC 20590

January 19, 2023

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

NEF-107DR  
23E-003

**Subject:** Helmets May Not Adequately Protect User/FMVSS 218

Dear Ms. Gerstenberg:

This letter serves to acknowledge Comoto Holdings, Inc.'s notification to the National Highway Traffic Safety Administration (NHTSA) of a safety recall which will be conducted pursuant to Federal law for the product(s) listed below. Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

**Makes/Models/Model Years:**

BILT HELMET/BILT ROUTE HELMET/9999  
BILT HELMET/BILT ROUTE JOURNEY/9999  
BILT HELMET/BILT ROUTE RETRO WOMENS/9999

**Mfr's Report Date:** January 13, 2023

**NHTSA Campaign Number:** 23E-003

**Components:**

EQUIPMENT:MOTORCYCLE:HELMETS

**Potential Number of Units Affected:** 18,980

**Problem Description:**

Comoto Holdings, Inc. (Comoto Holdings) is recalling certain Bilt Route BLH100, Bilt Route Retro Womens BLH118, and Bilt Route Journey BLH109 helmets, in sizes MD, XL, and XXL. The helmets may lack adequate penetration protection. As such, these helmets fail to comply with the requirements of Federal Motor Vehicle Safety Standard number 218, "Motorcycle Helmets."

**Consequence:**

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

**Remedy:**

Dealers will either provide a credit or replace the helmets, free of charge. Owner notification letters are expected to be mailed February 1, 2023. Owners may contact Comoto Holdings' customer service at 1-800-292-5343.

**Notes:**

Owners may also contact the National Highway Traffic Safety Administration Vehicle Safety Hotline at 1-888-327-4236 (TTY 1-800-424-9153), or go to [www.nhtsa.gov](http://www.nhtsa.gov).



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

We have received Comoto Holding's proposed owner notification letter and it has been approved for distribution.

**Please ensure the following requirements are met:**

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

**AMENDED 573 REQUIRED.**

Please be reminded of the following requirements:

Copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

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

As stated in Part 573.7, submission of the first of eight consecutive quarterly status reports is required within one month after the close of the calendar quarter in which notification to purchasers occurs. Therefore, the first quarterly report will be due on, or before, 30 days after the close of the calendar quarter.

Comoto Holdings, Inc.'s contact for this recall will be Darishea Rollins who may be reached by email at [darishea.rollins@dot.gov](mailto:darishea.rollins@dot.gov). We look forward to working with you.

Sincerely,



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