

 DOT Auto Safety Hotline Vehicle Owner's Questionnaire To Report Vehicle Safety Defects 1-888-DASH-2-DOT (1-888-327-4236) INTERNET:www.nhtsa.dot.gov/hotline				FOR AGENCY USE ONLY 100148	
				Date Received 13-JAN-2011	Repository ☐ Reference No. 10376502
OWNER INFORMATION (Type or Print)					
Name XXXXXXXXXX			Daytime Telephone Number XXXXXXXXXX		E-mail Address
Address XXXXXXXXXX			Evening Telephone Number		
City PORTERSVILLE	State PA	Zip Code XXXXXX			
<i>The information you provide will be used to identify potential safety-related defects. We may share your information with the applicable vehicle manufacturer during an investigation or recall in accordance with the routine uses described in the agency's Privacy Act notice. See 49 FR 53971 (Sep. 3, 2004).</i>					
VEHICLE INFORMATION					
17 digit Vehicle Identification Number Located at bottom of windshield on driver's side 4V4NC9GH15N XXXXXX			Make VOLVO	Model VNL	Model Year 2005
Date Purchased	Dealer's Name and Telephone Number			Engine: No: Cylinders	Fuel Type:
Original Owner ☐	Dealer's City	State	Zip Code		
Transmission Type	☐ Antilock Brakes ☐ Cruise Control	Powertrain	Multiple Failure:	Incident Date(s) 23-DEC-2010	
FAILED COMPONENT(S)/PART(S) INFORMATION					
Vehicle Component Code: 120000 EXTERIOR LIGHTING				Failure Mileage 638000	Failure Speed
ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A TIRE FAILURE					
Tire Make		Tire Model (Name or Number)		Tire Size (Example P215/65R15)	
DOT No. (Example: DOTM49ABC036)		☐ Original Equipment ☐ Prior Repair	Failure Location:		
Tire Component Code			Tire Failure Type:		
ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A CHILD SEAT FAILURE					
Make:		Date Manufactured:		Model No./Name:	
Seat Type:		Installation System:			
Child Seat Component Code:		Failed Part:			
APPLICABLE INCIDENT INFORMATION					
<i>(Please describe in detail the incident(s), Failure(s), Crash(es), and injury(ies).)</i>					
Crash ☐ Yes ☒ No	Fire ☐ Yes ☒ No	Number of Persons Injured 0	Number of Deaths 0	Reported to Police N	
Narrative Description of Incident(s), Crash(es), and Injury(ies). Please describe (1) events leading up to the failure, (2) failure and its consequences, and (3) what was done to correct the failure; i.e. parts repaired or replaced (and if old part is available).					
TL*THE CONTACT OWNS A 2005 VOLVO VNL. THE CONTACT STATED THAT THE LOW BEAM HEADLAMP REFLECTOR LENS WOULD NOT ILLUMINATE THE ROAD SURFACE PROPERLY CAUSING EXTREMELY POOR VISIBILITY. THE MANUFACTURER WAS NOTIFIED AND STATED THAT THE HEADLAMP ASSEMBLY WOULD NEED TO BE REPLACED. THE FAILURE MILEAGE WAS APPROXIMATELY 638,000.					
FEB 28 2011					
Include, if available: Police/Fire Department Report, Photos, and Repair Invoice. ATTACH ADDITIONAL SHEETS IF NECESSARY					
The Privacy Act of 1974-Public Law 93-579 This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a Manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.					

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February 14, 2011

US Department of Transportation
National Highway Traffic Safety Administration
Office of Defects Investigation, NVS-210
1200 New Jersey Avenue SE
Washington, DC 20077-9382

RE: DEFECTIVE LOW BEAM HEADLIGHT ASSEMBLY - 2005 VOLVO/ Ref #10376502

To Whom This May Concern:

I am a licensed inspection mechanic for the state of Pennsylvania and posses a Class A CDL which qualifies me to perform Federal Commercial Vehicle Inspections. The use of a light meter to measure the candlepower output of these vehicles would cause them to fail Pa. or Federal Vehicle inspection long before the 638,000 miles indicated in the report.

I believe that the information contained in the correspondence I received from the NHTSA confirms that in the event of failure, the entire headlamp assembly has to be replaced as the reflector in question is not available separately. This would be equivalent to having to change the entire cylinder head on a car to change the spark plug.

The problem with their solution to the is the reflective surface of the low beam reflector housing, one part of the assembly in question, is either defective or the ventilation of the housing is inadequate to dissipate the heat from the halogen bulb. This results to degradation of the reflective surface which over a period of time reduces the output of the light to well below the minimum required by law long before the 5 years or 638,000 miles mentioned in the report.

This is a major safety issue as the drivers ability to see at night or in inclement weather is severely hampered. Over a period of time, the driver would become accustomed to the low level of illumination and not be aware of the loss of visibility.

The part in question is never considered a consumable, such as brake lining, wiper blades, light bulbs, or tires, on any highway vehicle. This part is easily replaceable by removal of three small screws. Replacement of this part is only one step beyond steps required to replace the low beam bulb. This is shown in the included illustrations. Replacement of the light bulb is preformed by steps in illustrations C. and D. At that point, removal of the three Phillips Head screws permit's the low beam housing to be removed and replaced.

Illustration E shows the discoloration on the outside of the housing caused by the build-up of heat. Illustration F. shows the reflective service burned off of the inside of the reflector. Viewing of illustration G shows the reflective surface of a headlight reflector in excess of 12 years old, and yes it is also a Volvo headlight assembly.

This is not an isolated incident. According to information received at R&R Mack/Volvo in New Castle, Pa., quite a few of the complete assemblies have been sold to customers to rectify this inadequate light output condition.

If both assemblies are replaced, the cost would exceed \$800 dollars plus labor. Replacing the low beam reflector would be quicker and the cost would be substantially less.

Volvo needs to either offer this part separately, or issue a recall on this part and replace these reflectors at no cost to the customers.

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Illustration A . Front view of assembly.



Illustration B. Rear view of assembly



Illustration C. Showing removed cover to replace bulb.



Illustration D. Showing light bulb removed to replace bulb



Illustration E. Showing reflector removed by taking out 3 screws. Notice burned surface on top.



Illustration F. Showing degraded surface inside reflector causing loss of illumination ahead of vehicle.

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Illustration G shows reflector of 12 year old light assembly.

This is a picture of a headlight assembly from a 1998 Volvo truck. As you can see, the reflective surface is in excellent condition.

It would be interesting to research the history of how many 2005 and newer Volvo VN630 series trucks have been in accidents due to lack of visibility.

Thank you in advance for your attention to this issue.

Sincerely,

Portersville, Pa.

Sole-proprietor
Simple Solutions



Portersville, PA

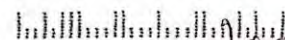
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U.S. DEPARTMENT OF TRANSPORTATION
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION
OFFICE OF DEFECTS INVESTIGATION, NVS-210
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WASHINGTON,
D. C.



20077-9382