U.S. Department of Transportation

National Highway Traffic Safety Administration

ODI RESUME

OFFICE OF DEFECTS INVESTIGATION

NHTSA

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Investigation: EQ 10-007
Prompted by: 10E-038
Date Opened: 08/19/2010 **Date Closed:** 08/06/2012
Investigator: Alexander Ansley
Approver: Jennifer Timian
Subject: Webasto Sunroof Separation

MANUFACTURER & PRODUCT INFORMATION

Manufacturer: WEBASTO PRODUCT NORTH AMERICA, INC.
Products: Webasto Hollandia 600/700/TVS 900 produced 2002 through 2010
Population: 292,867

Problem Description: Certain Webasto sunroofs can experience a failure of the adhesive bond between the sunroof glass and frame.

ACTION / SUMMARY INFORMATION

Action: Close EQ

Summary:

On August 10, 2010, Webasto notified the NHTSA that it had decided certain Hollandia 600/700 & Hollandia TVS 900 aftermarket sunroofs contained a safety related defect. Webasto stated that these sunroof models, manufactured between 2002 and 2010, may experience an adhesive bond failure where the sunroof glass attaches to its frame. This failure increases the risk of the glass detaching from the vehicle and causing injury to other motorists or pedestrians. This recall was assigned number 10E-038.

Webasto and its counsel met with RMD on August 18, 2010 to discuss the recall's next steps. RMD learned that the majority of these products are installed by a third party, on new motor vehicles that have not yet been retailed, often at the request of a new car dealership. These installers are required to notify the NHTSA of any new vehicles they altered by way of a Part 573 Defect Report.

On September 2, 2010, RMD issued an information request (IR) letter to Webasto requesting a list of companies who purchased the defective sunroof models. Webasto replied on September 9, 2010, submitting a purchaser list to NHTSA's Office of the Chief Counsel (NCC) for confidentiality consideration. NCC granted this confidentiality request as the release of Webasto's purchaser list could cause substantial competitive harm.

Due to the large number of companies that purchased these sunroofs, RMD worked with Webasto to ensure notifications to Webasto's authorized installers (AIs) included instructions on how to file a Defect Report with NHTSA should one be required. For those AIs that altered new vehicles (vehicles not yet delivered to the first retail purchaser), the AI notification letter offered guidance on how to submit a Defect Report to NHTSA and instructions that a third party, Impartial Services Group, LLC (ISG), would be contacting them to obtain VIN information for vehicles they altered as new. ISG obtained VIN information from each AI and returned to them a computerized list of vehicle year, make, and model as this information is necessary for a Defect Report submitted to NHTSA. ISG then utilized the acquired VIN information to notify the current registered owners about the safety recall.

On July 5, 2011, RMD mailed IR letters to 87 AIs that had previously communicated to Webasto that they had maintained vehicle VIN records for their past alterations, but had not yet sent those records to ISG. Forty-five (45) of these companies did not respond to RMD's IR letter, however, some did take action by submitting their records to ISG. RMD chose to mail a second IR letter on April 19, 2012, to 8 AIs who were identified as having the largest quantities of sunroof installations that needed to be recalled. Four (4) companies responded by filing Defect Reports with NHTSA and sending their affected VINs to ISG for consumer notification. The information for the 4 nonresponsive companies: Automotive Concepts, Classic Auto Interiors & Accessories, Dundalk Glass Center, and Kenny's Auto Stylist will be forwarded to NCC for possible enforcement action at their discretion.

With an ISG generated vehicle list and a Defect Report, RMD received safety recalls from 111 AIs recalling over

74,000 vehicles. It is very likely that more AIs contacted ISG and Webasto to submit their records of affected vehicles, but failed to notify the NHTSA of their actions. Webasto has mailed over 231,000 owner notification letters to vehicle owners that have recalled sunroof assemblies.

This investigation is concluded as we believe we have realized the safety benefits that can be reasonably achieved through an Equipment Query of this scope.

This EQ is closed.