GROTE INDUSTRIES, LLC

OFFICE OF DEFECTS & INVESTIGATIONS
2010 JUL 21 A 8:22

PARTIAL RESPONSE TO MAY 27, 2010 INFORMATION REQUEST

PE10-013

July 16, 2010

Grote Industries, LLC ("Grote") submits the following partial response to the agency's May 27, 2010 information request. This response includes Grote's response to Request No. 1, Request No. 3 (warranty data only) and Request No. 4. As previously discussed with and agreed to by the agency, the balance of Grote's response will be submitted by July 28, 2010.

Request No. 1: Provide a model/part number listing of all subject components manufactured by Grote and the production volume by month. Provide this listing by model/part number, production month, the number produced for original equipment installation per month, and the total number produced per month. Uniquely identify the lamps that were subject to recall 10V-013.

Provide this information in Microsoft Access, Excel 2003, or a compatible electronic format, entitled "Request No. 1 Data".

Response: Please see the file entitled "Request No. 1 Data," which is included on the enclosed CD-ROM. (This file contains confidential business information for which a request for confidential treatment is being submitted to the Office of Chief Counsel.) By agreement, the scope of products covered by the information request has been modified to include the 22 lamps listed in the attached file.

Request No. 3 Separately for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:

a. Grote's file number or other identifier used;
b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
c. The lamp model/part number;
d. The lamp build date;
e. Incident date;
f. Incident state;
g. Report or claim date;
h. Whether a fire is alleged;
i. Whether property damage is alleged;
j. Whether or not Grote received a subrogation claim regarding the incident (Y/N);
k. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;

l. Consumer comments;
m. The number of alleged injuries, if any;
n. The number of alleged fatalities, if any:
o. The vehicle 17 digit VIN the lamp/lamps were installed on;
p. The model and model year of the vehicle the lamp/lamps were installed on;
q. A brief description of the incident;
r. A brief description of the alleged relationship / contribution of the lamp's malfunction to the incident;
s. Grote's assessment of the allegation; and,
t. The current location of the damaged lamp;

Provide this information in Microsoft Access 2000, or a compatible format, entitled "Request No, 2 Data". See Enclosure 1, Data Collection Disc, for a pre-formatted table designed for this submission.

Response: Please see the file entitled "Request No, 2 Data," which is included on the enclosed CD-ROM. This file contains Grote's initial response to Request No. 3 and includes electronically-available warranty data. Grote will supplement this response with other data categories (field reports, consumer complaints, property damage claims, etc.) with its final submission by July 28, 2010.)

This response covers each of the part numbers listed in Grote's Response to Request No. 1 and includes claims that were assigned Warranty Analysis code "L12." Please see Grote's Response to Request No. 4 for a description of the "L12" code. It should be noted, however, that failures meeting the criteria of the "alleged defect" (defined in the information request to include "smoking, melting, burning or open flame") would be a subset of claims designated as L12. In fact, the vast majority of L12 claims simply involve discoloration of the lens, potting or LED or other events did not involve "smoking, melting, burning or open flame." A review of the claim descriptions indicates that only a fraction of L12 claims expressly refer to burning, overheating or other similar events. However, Grote was overinclusive in its response to permit the Agency to evaluate the full scope of L12 data.

(This file contains confidential business information for which a request for confidential treatment is being submitted to the Office of Chief Counsel.)

Request No. 4 Describe in detail the search criteria used by Grote to identify the claims identified in response to Request No. 2, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles.

Response: Grote derived the list of warranty claims identified in Grote's Response to Request No. 3 by searching its warranty database by first identifying any claims including the 22 part numbers included in Grote's response to Request No. 1. Grote then

identified claims that were assigned a Warranty Analysis Code "L12." Grote included all failures classified using the "L12" Warranty Analysis Code in its response.

L12 Warranty Analysis Code:

The "L12" Warranty Analysis Code was used to classify incandescent lamp failure modes prior to the development of LED lamps. The "L12" Warranty Analysis Code denotes discoloration or obfuscation of the lens; discoloration of the base or bulb; deformation of the lens, base, wiring insulation or connectors (if applicable), including discontinuities, voids or other evidence of thermoplasticity; or degradation of the lamp assembly due to exothermic oxidation of the lens, base, wiring insulation or terminals (if applicable). Therefore, incandescent lamp failures such as "Burnt Out" may be classified as "L12" if bulb discoloration is evident or if the failure included bulb integrity and discoloration of adjacent materials. Accordingly, for incandescent lamps classification as an "L12" failure is consistent with limited radiant heat dissipation during operation.

In LED lamps, an "L12" failure may present simply as a black or darkened LED. Such discoloration of the lens, potting, LED, bulb or base may be caused by water intrusion, which may be caused by installation deformations of the lens or base.

* * *

This response is based on searches of Grote locations where documents determined to be responsive would ordinarily be found. As a result, the scope of the search did not include, nor could it reasonably include, "all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Grote (including all business units and persons previously referred to) . . ." In the ordinary course of business, information of the type requested is transmitted to the Grote locations that have been searched. This response was compiled and prepared by Grote based upon a review of relevant documents obtained from various Grote locations, and does not include documents or information generated or received at those locations subsequent to their searches.

A request for confidential treatment is being submitted to the Office of Chief Counsel for this response. Accordingly, please treat this information as confidential until the Office of Chief Counsel completes its confidentiality determination.

PE10-013 Request No. 1 Data
Confidential Business Information

			10V-038	Year/Month Production Volume									
Part #	Color	Dwg #	Recall?	2004/01	2004/02	2004/03	2004/04	2004/05	2004/06	2004/07	2004/08	2004/09	2004/10
01470722	RED	01-4707-20_J	No	[redacted]									
01470723	RED	01-4707-20_J	No										
01470732	YEL	01-4707-30	No										
01470733	YEL	01-4707-30	No										
01470771	YEL	01-4707-30	No										
01470922	RED	01-4709-20	Yes										
01470923	RED	01-4709-20	Yes										
01470932	YEL	01-4709-30	Yes										
01470933	YEL	01-4709-30	Yes										
01471622	RED	01-4716-XX_F	No										
01471623	RED	01-4716-XX_F	No										
01471632	YEL	01-4716-XX_F	No										
01471633	YEL	01-4716-XX_F	No										
01471674	RED	01-4716-XX_F	No										
01472423	RED	01-4724-XX_D	No										
01472433	YEL	01-4724-YY_D	No										
01474633	YEL	01-4746-XX_F	No										
01474623	RED	01-4746-XX_F	No										
01472481	RED	01-4724-80-81_C	No										
01472483	YEL	01-4724-82-83_C	No										
01474677	RED	01-4746-ZZ_C	No										
01474679	YEL	01-4746-ZZ_C	No										

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Part #	2004/11	2004/12	2005/01	2005/02	2005/03	2005/04	2005/05	2005/06	2005/07	2005/08	2005/09	2005/10	2005/11	2005/12
01470722														
01470723														
01470732														
01470733														
01470771														
01470922														
01470923														
01470932														
01470933														
01471622														
01471623														
01471632														
01471633														
01471674														
01472423														
01472433														
01474633														
01474623														
01472481														
01472483														
01474677														
01474679														

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													3 Year Quantity
Part #	**2006/01**	**2006/02**	**2006/03**	**2006/04**	**2006/05**	**2006/06**	**2006/07**	**2006/08**	**2006/09**	**2006/10**	**2006/11**	**2006/12**	**Grand Total**
01470722													
01470723													
01470732													
01470733													
01470771													
01470922													
01470923													
01470932													
01470933													
01471622													
01471623													
01471632													
01471633													
01471674													
01472423													
01472433													
01474633													
01474623													
01472481													
01472483													
01474677													
01474679													

PE10-013 Request No. 1 Data
Confidential Business Information

	3 Yr "drawing"
Part #	**Volume**
01470722	[redacted]
01470723	
01470732	
01470733	
01470771	
01470922	
01470923	
01470932	
01470933	
01471622	
01471623	
01471632	
01471633	
01471674	
01472423	
01472433	
01474633	
01474623	
01472481	
01472483	
01474677	
01474679	