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

1200 New Jersey Avenue SE
Washington, DC 20590

MAR 2 2 2012

Via USPS Certified Mail
Mr. Evan Slavitt
Counsel
AVX Corporation
One AVX Boulevard
Fountain Inn, SC 29644-9039

NVS-215aa
EQ12-001
11E-045

Re: NHTSA's March 6, 2012 Information Request Letter

Dear Mr. Slavitt:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Sure Power, Inc. (Sure Power) battery separators that the manufacturer has decided contain a safety related defect that could cause a vehicle fire. This investigation has been assigned the identification EQ12-001.

On March 6, 2012, RMD mailed an information request (IR) letter to AVX Corporation (AVX) to gather more information about the distribution of any defective capacitors installed into motor vehicle equipment. However, since this letter was issued, new information has been filed by Sure Power which supplements their October 20, 2011 defect filing by clarifying the cause of the safety defect found in their battery separators. This new information from Sure Power is enclosed with this letter. As Sure Power now reports that the cause of their safety related defect does not lie in the capacitors manufactured by AVX, we withdraw our March 6, 2012 letter to AVX and no written response will be required of AVX.

If you have any questions concerning this matter, please contact Alex Ansley of my staff at (202) 493-0481 or by e-mail at alexander.ansley@dot.gov.

Sincerely,

Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Enclosure

Cooper Bussmann
114 Old State Road
Ellisville, MO 63021

COOPER Bussmann

BY ELECTRONIC MAIL (rmd.odi@dot.gov)

March 21, 2012

Ms. Nancy L. Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Supplement to October 20, 2011 Defect Notice, NHTSA Recall No. 11E045

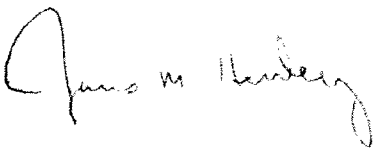
Dear Ms. Lewis:

Sure Power, Inc. (a subsidiary of Cooper Bussmann, LLC) hereby supplements its October 20, 2011 Part 573 Defect Notification in the above-referenced recall to clarify its description of the defect.

As set forth in the original notice, the defect condition leading to the recall was that "[s]ome of the subject units may experience an internal circuit board capacitor failure, which could lead to overheating, smoke and, possibly, a fire during or following use." Sure Power would like to clarify that, although the defect does manifest itself in the capacitor (by way of micro-cracking, shorting and subsequent thermal events), the capacitor failures were found to be caused by printed circuit board assembly issues external to the capacitor, rather than a defect in the capacitors themselves. Specifically, the capacitors were installed too close to the board edge, which led to microfractures in the capacitor. Over time, and after being subjected to working voltages and high temperatures, these fractures could propagate and lead to a short.

Please let me know if you have questions about this matter.

Sincerely,



Director, Quality Assurance

cc: RosaMaria Villagomez, Esq. (Cooper US, Inc.)
Christopher H. Grigorian, Esq. (Foley & Lardner LLP)