COMMERCIAL VAN INTERIORS
Specialists in the Working Van and Truck

Combining National Strength with Neighborhood Service

2570B Oscar Johnson Drive • N. Charleston, SC 29405
Tel. #: (803) 554-7477 • Fax #: (803) 554-5001

June 22, 2012

US Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590

Reference: Identification Number EQ12-001
Safety Recall 11E-045

To Whom It May Concern:

We are responding to your notice (see attached), regarding a safety recall of Sure Power battery separators. Your letter stated that Sure Power sold Commercial Van Interiors 17 of these defective battery separators. We have verified that we did purchase 17 of these items but we returned 6 of them back to Sure Power, leaving 11 to be sold by Commercial Van. We identified several customers for which we did sell the model numbers named in the recall notice during the time period of February 2009 through June 2011. Neither Commercial Van Interiors nor Sure Power tracks equipment sold by serial number. As a result the attached list will show more than 11 items sold. The customers on this list should be able to view the serial numbers on the battery separators to determine if the battery separator falls under this recall.

Please see the attached list of customers who were sold battery separators during the time period identified. If there is anything additional that Commercial Van Interiors needs to do in regard to this recall please let us know.

Sincerely,

Joseph C. Hessel
Corporate Controller

InvoiceNum	InvDate	CustomerName	Quanity	PartNum	Description	Price	Address1	Address2	City	State	Zip	Phone	Email
133752	3/31/2009	EXTREME POWER SPORTS	1	1314	Battery Separator	$ 74.57	2506 SOUTH ELM ST.		Greenville	IL	62246-	618-664-2577	
133997	6/1/2009	EXTREME POWER SPORTS	1	1314	Battery Separator	$ 74.57	2506 SOUTH ELM ST.		Greenville	IL	62246-	618-664-2577	
135385	3/11/2010	EXTREME POWER SPORTS	1	1314	Battery Separator	$ 74.57	2506 SOUTH ELM ST.		Greenville	IL	62246-	618-664-2577	
135391	3/16/2010	EXTREME POWER SPORTS	1	1314	Battery Separator	$ 74.57	2506 SOUTH ELM ST.		Greenville	IL	62246-	618-664-2577	
135707	6/15/2010	EXTREME POWER SPORTS	2	1314	Battery Separator	$ 74.57	2506 SOUTH ELM ST.		Greenville	IL	62246-	618-664-2577	
273649	3/9/2009	PEARLMAN/KEYSTONE TOOLS	1	1314	Battery Separator Solenoid	$ 75.00	6210 S GARFIELD AVE	ATTN: BRENDA SMITH	COMMERCE	CA	90040-	800-969-0661	BRENDA.SMITH@PEARLAMAN.IND.COM
273926	4/17/2009	PEARLMAN/KEYSTONE TOOLS	-1	1314	Battery Separator Solenoid	$ 75.00	6210 S GARFIELD AVE	ATTN: BRENDA SMITH	COMMERCE	CA	90040-	800-969-0661	BRENDA.SMITH@PEARLAMAN.IND.COM
273927	4/17/2009	PEARLMAN/KEYSTONE TOOLS	1	1314	Battery Separator Solenoid	$ 75.00	6210 S GARFIELD AVE	ATTN: BRENDA SMITH	COMMERCE	CA	90040-	800-969-0661	BRENDA.SMITH@PEARLAMAN.IND.COM
274565	7/28/2009	PEARLMAN/KEYSTONE TOOLS	1	1314	Battery Separator Solenoid	$ 75.00	6210 S GARFIELD AVE	ATTN: BRENDA SMITH	COMMERCE	CA	90040-	800-969-0661	BRENDA.SMITH@PEARLAMAN.IND.COM
273747	3/20/2009	B&B LOCK & KEY SERVICE	1	1314	Battery Separator Solenoid	$ 75.00	9605 SOUTH VERMONT AVE		LOS ANGELES	CA	90044	(323) 779-0250	
274115	5/20/2009	DIEBOLD	1	1314	Battery Separator Solenoid	$ 75.00	402 S. MILLIKEN AVE STE. D		ONTARIO	CA	91761	(909) 390-9415	
274618	8/5/2009	ERNESTO LOCK & KEY	1	1314	Battery Separator Solenoid	$ 75.00	10155 SOPHIA AVE		NORTH HILLS	CA	91343	(310) 902-5887	
275813	2/11/2010	M & J VALERO AUTO SERVICE	1	1314	Battery Separator Solenoid	$ 75.00	4236 EAGLE ROCL BLVD		LOS ANGELES	CA	90065	(323) 254-4784	
277194	8/17/2010	MARK CHRISTOPHER CHEVROLET	1	1314	Battery Separator Solenoid	$ 75.00	2131 East "D" Street	909-390-2900	Ontario	CA	91764	909-390-2900	A/P Christine fax 909-390-2956
278806	2/23/2011	XELAJU LOCK & KEY	1	1314	Battery Separator Solenoid	$ 75.00	16223 BAMBOO ST		LA PUENTE	CA	91744-	626-825-1797	
279665	5/23/2011	GEORGE CHEVROLET	1	1314	Battery Separator Solenoid	$ 75.00	17000 Lakewood Blvd.		Bellflower	CA	90706-	562-925-2500	A/P fax (562) 925-8880

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

JUN 05 2012

1200 New Jersey Avenue SE
Washington, DC 20590

Via USPS Certified Mail
Warranty / Compliance Department
Commercial Van Interiors
8840 Saint Charles Rock Rd
Saint Louis, MO 63114

NVS-215aa
EQ12-001
11E-045

Re: Safety Recall 11E-045

Dear Sir or Madam:

The Office of Defects Investigation (ODI), Recall Management Division (RMD) is conducting an equipment query (EQ) investigation in relation to certain Sure Power, Inc. 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.

In a letter dated October 20, 2011, Sure Power, Inc. (Sure Power) notified the NHTSA that it had decided certain Sure Power battery separators contain a safety related defect. Sure Power stated that certain battery separators, shipped to various distributors and vehicle manufacturers between February 2009 and June 2011, may experience an internal circuit board capacitor failure. A circuit board capacitor failure could lead to overheating, smoke, and, possibly, a fire during or following use. NHTSA assigned recall number 11E-045 to this matter. A copy of the respective notification is enclosed for your information.

Sure Power reported to NHTSA that it sold 17 of these defective battery separators to Commercial Van Interiors (your company).

The purpose of this request is to obtain a list of purchasers that were sold these battery separators so they are made aware of this safety defect decision and are able to determine the need for any similar safety recall on products they may have manufactured using the same equipment. It is also to request your company provide the requisite defect report should it agree that it manufactured and sold defective motor vehicles or motor vehicle equipment to its purchasers. It is further to ascertain whether your company manufactured and sold or distributed any defective equipment in the replacement market for which it may have responsibility for filing a report with NHTSA and conducting a recall campaign. Accordingly, we require the following information:

1. Provide a list of all customers that received the same or similarly defective Sure Power battery separators from your company and provide their company name, line of business (i.e. vehicle manufacturer, equipment manufacturer, distributor, etc.), address, phone number, contact person, quantity sold to each, and sale date.

2. State whether your company manufactured and sold or distributed any motor vehicle equipment containing these Sure Power battery separators and, if so, provide a list of all purchasers that received this equipment from your company and provide their company name, line of business (i.e. vehicle manufacturer, equipment manufacturer, distributor, etc.), address, phone number, contact person, quantity sold to each, and sale date.

Pursuant to Federal law, a manufacturer of motor vehicles or motor vehicle equipment must notify NHTSA, within five (5) business days, when they first learn a safety defect or a noncompliance with a Federal Motor Vehicle Safety Standard exists in that equipment. In the case of a defect or noncompliance in original equipment installed in the vehicles of more than one manufacturer, notification to NHTSA must be made by the original equipment manufacturer as to the equipment item, and by each vehicle manufacturer as to those vehicles it manufactured in which the defective equipment was installed. The content of that notification is specified in 49 U.S.C. 573.6, Defect and Noncompliance Information Report.

If your company has not received any of this equipment, or if your products are not available to be sold, offered for sale, delivered, or imported into the United States, please so state. If your company does not agree with Sure Power that a defect exists in these battery separators, you must submit a written response explaining your decision including all supporting documents, analysis, and/or test reports.

This letter is being sent to your company pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49. Your company's failure to respond promptly and fully to this letter could subject your company to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163.

If your company claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, your company must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended (69 Fed. Reg. 21409 et seq; April 21, 2004), to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Your company is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6.

Your company's written response must be submitted to this office within 10 days of receiving this letter. In your response, please be certain to include a reference to this matter's identification number which is EQ12-001.

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. Response submissions may be made by US Mail, fax (202) 366-7882, or e-mail rmd.odi@dot.gov.

Sincerely,

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

Enclosure