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

1200 New Jersey Avenue SE
Washington, DC 20590

JUN 05 2012

Via USPS Certified Mail
Warranty / Compliance Department
B & C Truck Electric
1600 Campbell
Kansas City, MO 64108

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 218 of these defective battery separators to B & C Truck Electric (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

DATES: 02/01/2009 to 06/30/2011 TRANSACTION TYPES: Invc/War Exc/Core/New/War/Obsl
ACCOUNTS: ALL AREA: ALL REP: ALL STATE: ALL
PART: 1315 GROUPS: ALL CORE: ALL MFG: ALL WHS: ALL

Process Date	Accnt Numb.	Part Number	Grp Cod	CT Cd	Mfg Cod	S T	Qty Pch/Ret	Exchange Total	Core Total	Inv/Cr Number
02/11/09	00036	1315	080	00	000	I	2	144.14	0.00	B23086
03/16/09	00036	1315	080	00	000	I	2	144.14	0.00	B23734
04/29/09	00036	1315	080	00	000	I	1	72.07	0.00	B24567
05/13/09	00036	1315	080	00	000	I	1	72.07	0.00	B24801
05/28/09	00036	1315	080	00	000	I	1	72.07	0.00	B25084
06/30/09	00036	1315	080	00	000	I	3	216.21	0.00	B25696
07/24/09	00036	1315	080	00	000	I	1	72.07	0.00	B26232
08/17/09	00036	1315	080	00	000	I	1	72.07	0.00	B26669
11/06/09	00036	1315	080	00	000	I	3	216.21	0.00	B28343
12/07/09	00036	1315	080	00	000	I	1	72.07	0.00	B28861
05/21/10	00036	1315	080	00	000	I	1	85.36	0.00	B32127
02/24/11	00036	1315	080	00	000	I	6	432.42	0.00	B38292
*** ACCOUNT	00036	subtotal for number of parts processed							12	
*** ACCOUNT	00036	subtotal for qty purchased/returned							23	
*** ACCOUNT	00036	subtotal for exchange value						1670.90		

Kansas City Powe + Light
4400 E Front St.
K.C. MO 64141

09/23/10	00178	1315	080	00	000	I	1	41.81	0.00	B34853
04/25/11	00178	1315	080	00	000	I	1	41.81	0.00	B40566
04/25/11	00178	1315	080	00	000	I	1	41.81	0.00	B40567
*** ACCOUNT	00178	subtotal for number of parts processed							3	
*** ACCOUNT	00178	subtotal for qty purchased/returned							3	
*** ACCOUNT	00178	subtotal for exchange value						125.43		

George J. Hust Co
3900 Spring Grove Ave
Cincinnati OH 45223

11/04/10	00184	1315	080	00	000	I	6	250.86	0.00	B35750
12/20/10	00184	1315	080	00	000	I	7	292.67	0.00	B36708
*** ACCOUNT	00184	subtotal for number of parts processed							2	
*** ACCOUNT	00184	subtotal for qty purchased/returned							13	
*** ACCOUNT	00184	subtotal for exchange value						543.53		

Brett Equipment Co
13907 S Kostner Ave
Crestwood IL 60445

08/03/10	00703	1315	080	00	000	I	1	65.63	0.00	B33701
*** ACCOUNT	00703	subtotal for number of parts processed							1	
*** ACCOUNT	00703	subtotal for qty purchased/returned							1	
*** ACCOUNT	00703	subtotal for exchange value						65.63		

City of Overland Park
11300 W 91st St.
Overland Park KS 66214

04/10/09	00844	1315	080	00	000	I	2	116.08	0.00	B24235
04/27/09	00844	1315	080	00	000	I	2	116.08	0.00	B24506
05/11/09	00844	1315	080	00	000	I	1	58.04	0.00	B24763
05/11/09	00844	1315	080	00	000	I	3	174.12	0.00	B24764
05/11/09	00844	1315	080	00	000	I	2	116.08	0.00	B24765
05/12/09	00844	1315	080	00	000	I	6	348.24	0.00	B24790
05/12/09	00844	1315	080	00	000	I	2	116.08	0.00	B24791
05/12/09	00844	1315	080	00	000	I	2	116.08	0.00	B24792
05/12/09	00844	1315	080	00	000	I	2	116.08	0.00	B24793

Altec Industries PSD-51
P O Box 380788
Birmingham AL 35238

DATES: 02/01/2009 to 06/30/2011 TRANSACTION TYPES: Invc/War Exc/Core/New/War/Obsl
ACCOUNTS: ALL AREA: ALL REP: ALL STATE: ALL
PART: 1315 GROUPS: ALL CORE: ALL MFG: ALL WHS: ALL

Process Date	Accnt Numb.	Part Number	Grp Cod	CT Cd	Mfg Cod	S T	Qty Pch/Ret	Exchange Total	Core Total	Inv/Cr Number
05/19/09	00844	1315	080	00	000	I	4	232.16	0.00	B24916
05/19/09	00844	1315	080	00	000	I	4	232.16	0.00	B24917
05/19/09	00844	1315	080	00	000	I	6	348.24	0.00	B24918
06/25/09	00844	1315	080	00	000	I	2	116.08	0.00	B25612
06/25/09	00844	1315	080	00	000	I	2	116.08	0.00	B25613
07/02/09	00844	1315	080	00	000	I	6	348.24	0.00	B25758
07/17/09	00844	1315	080	00	000	I	8	464.32	0.00	B26072
07/17/09	00844	1315	080	00	000	I	6	348.24	0.00	B26073
08/26/09	00844	1315	080	00	000	I	2	116.08	0.00	B26899
09/04/09	00844	1315	080	00	000	I	2	116.08	0.00	B27109
09/21/09	00844	1315	080	00	000	I	6	348.24	0.00	B27369
09/30/09	00844	1315	080	00	000	I	2	116.08	0.00	B27593
10/01/09	00844	1315	080	00	000	I	2	116.08	0.00	B27597
10/09/09	00844	1315	080	00	000	I	2	116.08	0.00	B27810
10/09/09	00844	1315	080	00	000	I	2	116.08	0.00	B27811
10/09/09	00844	1315	080	00	000	I	2	116.08	0.00	B27812
10/09/09	00844	1315	080	00	000	I	4	232.16	0.00	B27814
10/21/09	00844	1315	080	00	000	I	2	116.08	0.00	B28007
10/21/09	00844	1315	080	00	000	I	4	232.16	0.00	B28008
11/06/09	00844	1315	080	00	000	I	2	116.08	0.00	B28326
11/06/09	00844	1315	080	00	000	I	6	348.24	0.00	B28326
11/06/09	00844	1315	080	00	000	I	2	116.08	0.00	B28327
11/06/09	00844	1315	080	00	000	I	2	116.08	0.00	B28328
02/23/10	00844	1315	080	00	000	I	4	232.16	0.00	B30374
02/23/10	00844	1315	080	00	000	I	4	232.16	0.00	B30375
03/12/10	00844	1315	080	00	000	I	2	116.08	0.00	B30768
03/18/10	00844	1315	080	00	000	I	8	464.32	0.00	B30850
03/25/10	00844	1315	080	00	000	I	3	174.12	0.00	B30981
03/25/10	00844	1315	080	00	000	I	2	116.08	0.00	B30982
05/12/10	00844	1315	080	00	000	I	3	174.12	0.00	B31902
05/12/10	00844	1315	080	00	000	I	9	522.36	0.00	B31903
06/10/10	00844	1315	080	00	000	I	5	290.20	0.00	B32518
07/07/10	00844	1315	080	00	000	I	7	406.28	0.00	B33076
09/23/10	00844	1315	080	00	000	I	12	696.48	0.00	B34856
10/29/10	00844	1315	080	00	000	I	18	1044.72	0.00	B35644
12/30/10	00844	1315	080	00	000	I	12	696.48	0.00	B36849
03/17/11	00844	1315	080	00	000	I	12	696.48	0.00	B39115
05/19/11	00844	1315	080	00	000	I	9	522.36	0.00	B41483
06/15/11	00844	1315	080	00	000	I	4	232.16	0.00	B42413
*** ACCOUNT	00844	subtotal for number of parts processed							48	
*** ACCOUNT	00844	subtotal for qty purchased/returned						216		
*** ACCOUNT	00844	subtotal for exchange value						12536.64		
09/27/10	17179	1315	080	00	000	I	10	439.00	0.00	B34915

INVOICE/CREDIT DETAIL REPORT

DATES: 02/01/2009 to 06/30/2011 TRANSACTION TYPES: Invc/War Exc/Core/New/War/Obsl
ACCOUNTS: ALL AREA: ALL REP: ALL STATE: ALL
PART: 1315 GROUPS: ALL CORE: ALL MFG: ALL WHS: ALL

Process Date	Accnt Numb.	Part Number	Grp Cod	CT Cd	Mfg Cod	S T	Qty Pch/Ret	Exchange Total	Core Total	Inv/Cr Number
*** ACCOUNT	17179		subtotal for number of parts processed				1			
*** ACCOUNT	17179		subtotal for qty purchased/returned				10			
*** ACCOUNT	17179		subtotal for exchange value					439.00		
07/30/10	99999	1315	000	00	000	I	3	125.43	0.00	B33622
09/03/10	99999	1315	000	00	000	I	2	83.62	0.00	B34420
03/07/11	99999	1315	000	00	000	I	1	55.63	0.00	B38608
*** ACCOUNT	99999		subtotal for number of parts processed				3			
*** ACCOUNT	99999		subtotal for qty purchased/returned				6			
*** ACCOUNT	99999		subtotal for exchange value					264.68		

))) Grand total for number of parts processed 70
))) Grand total for qty purchased/returned 272
))) Grand total for exchange value 15645.81
))) Grand total for core value 0.00
))) Grand total for number of accounts processed 7

3-7-11 B38608 JS Morris + Sons
6453 Delmare
St. Louis MO 63108

9-3-10 B34420 Brett Equipment
13907 S Kostner Ave
Crestwood IL 60445

7-30-10 B33622 Brett Equipment
13907 S Kostner Ave
Crestwood IL 60445

Total Documents 20761

06/08/2012 B & C KANSAS CITY
INVOICE/CREDIT DETAIL REPORT

DATES: 02/01/2009 to 06/30/2011 TRANSACTION TYPES: Invc/War Exc/Core/New/War/Obsl
ACCOUNTS: ALL AREA: ALL REP: ALL STATE: ALL
PART: 1314 GROUPS: ALL CORE: ALL MFG: ALL WHS: ALL

Process Date	Accnt Numb.	Part Number	Grp Cod	CT Cd	Mfg Cod	S T	Qty Pch/Ret	Exchange Total	Core Total	Inv/Cr Number
09/23/10	00178	1314	080	00	200	I	1	39.50	0.00	B34853
04/25/11	00178	1314	080	00	200	I	1	39.50	0.00	B40566
*** ACCOUNT	00178	subtotal for number of parts processed						2		
*** ACCOUNT	00178	subtotal for qty purchased/returned						2		
*** ACCOUNT	00178	subtotal for exchange value						79.00		
05/22/09	99999	1314	080	00	200	I	1	52.54	0.00	B24995
09/24/10	99999	1314	080	00	200	I	4	210.16	0.00	B34901
12/10/10	99999	1314	080	00	200	I	1	52.54	0.00	B36496
*** ACCOUNT	99999	subtotal for number of parts processed						3		
*** ACCOUNT	99999	subtotal for qty purchased/returned						6		
*** ACCOUNT	99999	subtotal for exchange value						315.24		

George J. Hust Co.
3900 Spring Grove Ave
Cincinnati OH 45223

))) Grand total for number of parts processed 5
))) Grand total for qty purchased/returned 8
))) Grand total for exchange value 394.24
))) Grand total for core value 0.00
))) Grand total for number of accounts processed 2

11E-045
(4 pages)

Ellisville, MO 63021

RECEIVED
By Recall Management Division at 8:07 am, Oct 21, 2011

COOPER Bussmann

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

October 20, 2011

Mr. Claude H. Harris
Acting Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Mr. Harris:

The following information is submitted in accordance with the National Highway Traffic Safety Administration's defect reporting regulations, 49 CFR Part 573.6.

Sure Power, Inc. has decided to voluntarily recall certain battery separators that were manufactured and shipped by Sure Power to authorized distributors and vehicle manufacturers from February 2009 through June 2011.

Product Identification

The recalled product is a battery separator designed for use in multi-battery applications as a solenoid priority system to protect the chassis charging system from excessive loading while allowing auxiliary batteries to charge. Most of these units were sold to distributors, while some were sold to the vehicle manufacturers listed in Attachment A for installation as original equipment.

The following part numbers and serial number ranges may be affected:

Model	Serial # Start	Serial # Stop
1314 (-B, BP-D)	09004545	11002845
1315 (-B, NM)	09002323	11001573
1318	09000274	11000192
1319	09000058	11000013
*Serial numbers are sequential by model number family.		

These products were manufactured by Sure Power. The capacitors used in these parts were supplied by:

AVX Corporation
One AVX Boulevard
Fountain Inn, SC 29644-9039

Cooper Bussmann
114 Old State Road
Ellisville, MO 63021

Recall Population
The recall population is approximately 14,990, which covers all of the units produced within the referenced production period and sold in the United States; however, this figure is over-inclusive and includes units that are not likely affected by the defect condition.

Description of Defect
Some 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.

Chronology of Events
March 2011 - Report of thermal damage from an Australian aftermarket distributor. These failures were initially believed to be attributed to unique 4x4 applications and operating conditions in the Australian Outback.

June 15, 2011 – Report from a U.S. distributor indicating the battery separator had failed thermally in seven incidents. Analysis of two returned field units indicated that capacitors on the printed circuit board had cracked and shorted through thermo migration.

June 28, 2011 – Report of a vehicle fire from the commercial fleet referenced above. The initial report was that the fire was caused by the battery separator; however, a subsequent inspection revealed that the fire was not caused by the battery separator.

July 2011 – Based on the failures observed in the Australian market, a consumer recall campaign was initiated in that market. Sure Power subsequently notified the Consumer Product Safety Commission and initiated a campaign in the U.S. market.

September 13, 2011 - Report of a vehicle fire in Canada involving a vehicle equipped with a Sure Power battery separator.

September/October – Sure Power arranged for an inspection of the Canada vehicle.

October 7, 2011 - Inspection of the Canadian vehicle was inconclusive concerning the involvement of the battery separator, but the separator was noted as a *possible* cause.

October 13, 2011 – Sure Power decided, out of an abundance of caution, to conduct a safety recall in accordance with the Safety Act and 49 CFR Part 573 and 577.

To date, there have been no reported injuries resulting from this product issue.

Remedy Program
Sure Power will replace affected product with new product at no charge to the customer. Sure Power's direct customers in the aftermarket channel will receive written notification and copies of the Part 577 Owner Letter to disseminate to their customers. (As noted above, Sure Power's direct customers were previously notified of this issue, but Sure Power will initiate a new notification campaign in accordance with NHTSA's regulations.)

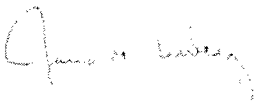
Cooper Bussmann
114 Old State Road
Ellisville, MO 63021

Part 577 Owner Letter and Dealer Bulletin

A draft Part 577 Owner Letter and a dealer bulletin will be submitted shortly. Sure Power is prepared to proceed with its customer notification program within five days after NHTSA's review and approval of the Owner Letter.

Please advise the undersigned of the campaign number assigned to this recall.

Sincerely,



James M. Henley
Director, Quality Assurance

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