

July 2, 2004

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NHTSA-215

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OFFICE OF
DEFECTS INVESTIGATION

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, DC 20590

TRW

Dear Sir:

Pursuant to Part 573 of Title 49 of the Code of Federal Regulations, Defect and Noncompliance Responsibility and Reports, the following information concerning a noncompliance with a motor vehicle safety standard and a defect in service replacement equipment that may be related to motor vehicle safety is submitted on behalf of TRW Vehicle Safety Systems Inc. and certain of its affiliated companies ("TRW").

573.5(c)(1) and (2)

The suspect equipment consists of certain service replacement seat belt assemblies manufactured for TRW, 4505 West 26 Mile Road, Washington, MI 49094, telephone number (586) 781-7200, at the Del Norte, Mexico, production plant of TRW Vehicle Safety Systems de Mexico S.A. de C.V. The seat belt assemblies exhibit a no-lock condition during an FMVSS 209 S4.3(j)(1) 0.7g vehicle sensing mechanism test (although these assemblies also have a secondary web sense locking feature which tests within specification). The suspect equipment was manufactured for driver side service replacement application only for 1997 Ford Motor Company ("Ford") Escort 4-door and station wagon platform vehicles; the Ford part number is F7CZ54611B09AAC. The subject parts were manufactured in a single lot of 388 pieces on December 6 and 9, 2002.

573.5(c)(3)

TRW shipped 388 driver side service replacement seat belt assemblies to Ford, of which at this time it is believed that 262 assemblies have been installed into vehicles and are considered 'in the field.' The remainder of the assemblies been or are in the process of being returned and/or destroyed.

573.5(c)(4)

It is believed that all 388 seat belt assemblies from the suspect population contain the condition described in this letter.

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573.5(c)(5)

The parts were misassembled by the improper placement of a link lever within the unit's locking mechanism.

573.5(c)(6) and (7)

On June 9, 2004, TRW was notified that a Ford employee had examined a subject service part and noticed a potential no lock condition. Subsequent investigation required return of service parts from Ford Service Depots and analysis of the parts to determine the extent of the population and the performance of the assembly. On July 1, 2004, tests were performed on certain assemblies from the subject lot and it was determined that those assemblies do not comply with locking requirements of FMVSS 209 S4.3(j)(1).

573.5(c)(8)

TRW intends to work with Ford to identify, if possible, owners of vehicles which may have the subject replacement assembly.

573.5(c)(9)

None

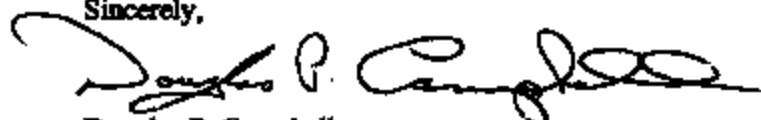
573(c)(10)

Pending

573(c)(11)

A TRW recall campaign number has not been assigned to this matter.

Sincerely,



Douglas P. Campbell
Vice President, Engineering
TRW Occupant Safety Systems