

05E-065 (18 pgs.)

JENNER & BLOCK

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R. Douglas Rees
Tel 312 923-2837
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October 4, 2005

RECEIVED
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2005 OCT -5 A 9:56
OFFICE OF
DEFECTS INVESTIGATION

**BY ELECTRONIC MAIL AND
FEDERAL EXPRESS**

George H. Person
Chief, Defects and Recall Information Analysis Division
National Highway Traffic Safety Administration
400 7th Street, SW
Washington, DC 20590

Re: *SPX Filtran Fuel Filters*

Dear Mr. Person:

On Friday, September 16, 2005, I telephoned Kelly Schuler of your office to inform her of a possible defect involving a fuel filter manufactured by our client, SPX Filtran. She asked me to send you a Part 573 Report with a copy to her. Accordingly, we sent an initial Part 573 Report on September 21, 2005.

Based on comments from Ms. Schuler and additional analysis by our client, we are submitting a revised and updated report, a copy of which is enclosed.

As the report indicates, internal testing performed by SPX Filtran has revealed that a small percentage of fuel filters manufactured by SPX Filtran may develop a leak due to a faulty brazing weld performed by one of SPX Filtran's suppliers. SPX Filtran has not received any warranty claims or reports of fire or incident resulting from the fuel filters. Nevertheless, SPX Filtran desires to cooperate fully with NHTSA's guidance with respect to steps NHTSA believes SPX Filtran should take with respect to this issue beyond those it already has taken to recover all unsold filters.

As the report also indicates, the person at SPX Filtran with knowledge regarding this matter is Greg Wagner, Vice President of Operations. However, I would appreciate the opportunity to speak with your department about how best to guide SPX Filtran in addressing any NHTSA concerns. I can be reached at (312)923-2837 or (312)222-9350.

Sincerely,



R. Douglas Rees

cc: Kelly Schuler, NHTSA
James R. Cauley, Esq.
Greg Wagner, SPX Filtran

Encls.

Re: SPX FILTRAN FUEL FILTERS

PART 573 Report of Possible Defect

As described below, SPX Filtran has identified a possible defect in certain fuel filters that are distributed for use as replacement parts in automobiles. The condition involves a potentially faulty brazing weld that could allow the fuel filter to develop a leak, particularly when placed under pressure. The fuel filters are distinguished by having either a 45-degree or a 90-degree inlet tube that is welded to the filter can.

Although SPX Filtran has not received any reports of any warranty claims or of any fires, injuries, or incidents caused by leaking fuel filters, because the issue relates to a possible defect in motor vehicle equipment that might affect motor vehicle safety, SPX Filtran is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573, Defect and Noncompliance Reports. SPX Filtran is working with its customer to identify and recall these filters to allow them to be inspected and tested for compliance.

Date this report was prepared: October 4, 2005

Furnish the manufacturer's identification code for this recall (if applicable): N/A

1. Identify the full corporate name of the fabricating manufacturer/brand name/trademark owner of the recalled item of equipment. If the recalled item of equipment is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

SPX Filtran
875 Seegers Road
Des Plaines, IL 60016-3098

SPX Filtran is a business unit of SPX Corporation, 13515 Ballantyne Corporate Place, Charlotte, NC 28277.

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

Greg Wagner, Vice President of Operations
SPX Filtran
875 Seegers Road
Des Plaines, IL 60016-3098
Telephone: 847/635-3805
Fax: 847/635-7724

SPX Filtran requests that any correspondence related to this matter be copied to:

James R. Cauley
SPX Corporation
Segment General Counsel
400 South Prairie Avenue (U.S. Mail)
1100 South Prairie Avenue (courier)
Telephone: 262/513-0600
Fax: 262/513-0601

Name and Title of Person who prepared this report:

Outside counsel R. Douglas Rees prepared this report based on consultation with and input from SPX Filtran personnel. Mr. Rees's contact information is:

R. Douglas Rees
Jenner & Block LLP
One IBM Plaza
Chicago, IL 60611-7781
Telephone: 312/923-2837
Fax: 312/840-7237

Signed:



I. Identify the Recalled Items of Equipment

2. Identify the Items of Equipment Involved in this Recall, for each make and model or applicable item of equipment product line (provide illustrations or photographs as necessary to describe the item of equipment), provide:

Generic name of the item: Fuel filters labeled as follows:

WIX® 33099 Fuel Filter

WIX® 33471 Fuel Filter

NAPA 3099 Fuel Filter

NAPA 3471 Fuel Filter

CARQUEST 86099 Fuel Filter

CARQUEST 86471 Fuel Filter

Make: Fuel Filter **Model:** SPX Filtran 800F350-S1 and 800F300-S2

(See photographs attached as Exhibit A.)

Part Numbers:

SPX Filtran Model “F350” (45-degree inlet tubes)

SPX Filtran number WIX800F350-S1 (WIX number 33099)

SPX Filtran number NAP800F350-S1 (NAPA number 3099)

SPX Filtran number CAR800F350-S1 (CARQUEST number 86099)

SPX Filtran Model “F300” (90-degree inlet tubes)

SPX Filtran number WIX800F300-S2 (WIX number 33471)

SPX Filtran number NAP800F300-S2 (NAPA number 3471)

SPX Filtran number CAR800F300-S2 (CARQUEST number 86471)

Function: Fuel filter used in passenger automobiles.

Other information which characterizes/distinguishes the items of equipment to be recalled:

The SPX Filtran Model "F350" fuel filter is distinguished by having a 45-degree angle on the inlet tube of the filter. (See photograph attached as Exhibit A.) The F350 fuel filter is an after-market replacement part used in certain vehicles manufactured by Ford and Mazda (Ford Probe 1993-1997 models; Mazda 1993-2001 models).

The SPX Filtran Model "F300" fuel filter is distinguished by having a 90-degree angle on the inlet tube of the filter. (See photograph attached as Exhibit A.) The F300 fuel filter is an after-market replacement part used in Subaru automobiles with EFI or Turbo engines produced from 1983 through 1994.

When installed, the fuel filter is located under the hood near the top rear of the engine, on the driver's side of the vehicle. (See illustration attached as Exhibit B. The location of the fuel filter is indicated by the letter F.)

SPX Filtran assembles and manufactures the Model F350 and Model F300 filters using parts supplied by various suppliers. The filter's inlet tube is welded into the filter can for SPX Filtran by its supplier, Carolina Commercial Heat Treating & Co. ("CCHT"). Some filters have been found to have "puddling" at the location of the brazing weld where the inlet tube enters the filter. (See photograph attached at Exhibit C.) The puddling appears to be brazing material that was applied by CCHT during its welding process.

II. Identifying the Recall Population

3. Furnish the total number of items of equipment recalled potentially containing the defect or noncompliance.

Model	Years	Number of Items Potentially Involved
800F350-S1	2004-2005	34,322
800F300-S2	2004-2005	8,640
Total Number Potentially Affected by the Recall:		42,962

4. Furnish the approximate percentage of the total number of items of equipment estimated to actually contain the defect or noncompliance:

SPX Filtran estimates that of the Model F350 45-degree inlet tube filters and Model F300 90-degree inlet tubes sold by SPX Filtran to its distributor, fewer than 10 % might have a potentially defective brazing weld. Of the Model F300 filters that have been returned to SPX Filtran, fewer than 1 percent have shown evidence of a potentially defective brazing weld. SPX Filtran has not yet completed testing of the Model F350 filters that have been returned by WIX.

Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled items of equipment:

As described in more detail in response to Number 6 below, SPX Filtran's internal inspection and testing process revealed that certain filters with angled inlet tubes exhibited potentially defective or non-conforming brazing welds where the inlet tube is connected to the filter can. Accordingly, SPX Filtran immediately stopped shipments of all filters with angled inlet tubes. SPX Filtran's distributor, WIX Filters, also stopped shipments of the same filters and initiated efforts to recover and return those filters to SPX Filtran.

Further inspections and testing of the filters returned to SPX Filtran revealed that a small number of Model F350 filters and Model F300 filters showed leaks in the area where the inlet tube was brazed to the filter can. The filters with leaks were manufactured in late 2004 and 2005 using filter cans with angled inlet tubes that had been manually brazed to the filter can by SPX Filtran's supplier, CCHT. Accordingly, this recall covers all inventories of Model F350 and Model F300 filters manufactured during 2004 and 2005.

Although SPX Filtran has not received any reports of any warranty claims or of any fires, injuries, or incidents caused by leaking fuel filters, because the issue relates to a possible defect in motor vehicle equipment that might affect motor vehicle safety, SPX Filtran is working with its customer, WIX, to recall the Model F350 and Model F300 fuel filters that have not been sold to end users.

III. Describe the Defect or Noncompliance

5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

The potential defect or noncompliance is a potentially faulty brazing weld on filters with angled inlet tubes. The brazing welds are located where the inlet tube enters the filter. (See photograph attached as Exhibit C.) In some instances, the condition may be revealed by “puddles” that form from brazing material that may not have been properly applied by CCHT. The condition also may be revealed if the inlet tube can be easily twisted off by hand or if the filter fails to pass a leak test.

Describe the cause(s) of the defect or noncompliance condition.

As stated above, SPX Filtran believes the condition was caused by potentially faulty brazing welds performed by SPX Filtran’s supplier, CCHT.

Describe the consequence(s) of the defect or noncompliance condition.

A possible consequence of the condition is a fuel filter that may leak fuel, particularly when placed under pressure in operation. The fuel filter is installed in automobiles near the top rear of the engine, on the driver’s side of the vehicle. (See Exhibit B, location “F.”) Although SPX Filtran has received no warranty claims or reports of fires or incidents caused by leaking filters, it is concerned that the possibility of fire may exist to the extent fuel filters with defective welds have been sold and installed.

Identify any warning which can (a) precede or (b) occur.

None known at this time.

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

Carolina Commercial Heat Treating & Co.
100 S. Main Street Ext.
Fountain Inn, SC 29644-1368

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:

Herb LeBoss, General Manager, CCHT

IV. Provide the Chronology in Determining the Defect/Noncompliance

If the recall is for a defect, complete item 6, otherwise item 7.

6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

On September 7, 2005, during its routine internal inspections and leak testing of fuel filters, SPX Filtran discovered leaks in certain filters that exhibited “puddled” brazing welds where its supplier, CCHT, had welded the inlet tube to the filter can. Further inspection revealed that some inlet tubes were loose and could be twisted off by hand. Further testing showed that the filters with puddled brazing welds tended to fail SPX Filtran’s leak test. SPX Filtran stopped shipping all “F350” and “F300” filters with angled inlet tubes and initiated further testing and review. That same day, SPX Filtran contacted CCHT, its supplier that performed the brazing welds, and requested a meeting the next day.

On September 8, 2005, SPX Filtran met with CCHT to discuss the brazing process for the parts supplied by CCHT to SPX Filtran. SPX Filtran also began its effort to identify how many filters it had received from CCHT and how many of those it had shipped to its current distributor, WIX Filters. SPX Filtran also initiated efforts to identify any unsold filters in its inventory that could be subjected to further inspections and testing.

On September 9 and 10, 2005, SPX Filtran conducted inspections and further testing of the unsold filters in its inventory.

On September 12, 2005, SPX Filtran contacted CCHT to discuss its brazing process. SPX Filtran also notified CCHT that the condition could present a safety issue that might require a potential recall. SPX Filtran informed CCHT that an SPX Filtran product engineer would visit CCHT’s facility the next day.

On September 13, 2005, a product engineer from SPX Filtran visited CCHT in an effort to confirm which shipments from CCHT to SPX Filtran contained filters with potentially defective welds. That same day, SPX Filtran contacted its distributor, WIX, to discuss the situation. WIX initiated a stop order to prevent further shipments of the filters.

On September 14 and 15, 2005, SPX Filtran conducted internal discussions concerning proper procedures and remedies.

On September 16, 2005, SPX Filtran sent a letter to its distributor, WIX (attached as Exhibit D) asking WIX to return to SPX Filtran all unsold Model F350 filters and to work with SPX Filtran to identify any additional filters that WIX had sold. WIX initiated efforts to notify its personnel and to identify the part numbers that might be affected.

Also on September 16, 2005, SPX Filtran notified the National Highway Traffic Safety Administration of this issue by telephone.

On September 21, 2005, SPX Filtran submitted an initial Part 537 Report to the National Highway Traffic Safety Administration. That same day, WIX informed SPX Filtran that it had identified two additional filters shipped before June 2005 that appeared to have faulty welds. An inspection by SPX Filtran on September 22, 2005, confirmed that two F350 (45-degree) filters manufactured on April 1, 2005 had potentially defective brazing welds.

On September 23 and 24, 2005, SPX Filtran received from WIX shipments of recalled Model F350 and F300 filters.

Based on preliminary inspections and tests of the recalled filters, SPX Filtran sent a follow-up letter to WIX on September 27, 2005 (attached as Exhibit E) to summarize the status of the investigation and to confirm the decision to attempt to recall all Model F350 45-degree filters and all Model F300 90-degree filters.

From September 29 through October 1, 2005, SPX Filtran conducted inspections and testing of the Model F300 filters returned from WIX. That testing identified a small number (less than 1%) that showed leaks in the area where the inlet tube was brazed to the filter can. SPX Filtran confirmed that the filters with leaks identified were manufactured in late 2004 and 2005 using filter cans with angled inlet tubes that had been manually brazed to the filter can by SPX Filtran's supplier, CCHT. SPX Filtran has not yet completed testing of the Model F350 filters returned from WIX.

SPX Filtran has not received any reports of any warranty claims or of any fires, injuries, or incidents caused by leaking fuel filters.

7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.

Testing of Filters Not Sent to Distributor:

On September 9 and 10, 2005, SPX Filtran inspected all 3,727 units of the Model "F350" (45-degree) filters still in its inventory. Of the 3,727 units inspected, 207 units (5.5%) were found with "puddled" brazing welds indicating a possible leak.

SPX Filtran also inspected all 1,265 units of Model "F300" (90-degree) filters still in its inventory. Of the 1,265 units inspected, 239 units (19%) were found with the "puddled" brazing welds indicating a possible leak.

SPX Filtran also performed leak tests on 106 unsold filters that showed no indication of puddled brazing welds. Of those units without puddled brazing welds, only 2 units (1.8%) failed the test.

SPX Filtran did not deliver any of these Model F350 or Model F300 filters to its distributor.

Testing of Recalled Filters (Returned to SPX Filtran by WIX):

From September 29 through October 1, 2005, SPX Filtran conducted inspections and testing of the F300 filters returned from WIX. That testing identified a small number (less than 1%) that showed leaks in the area where the inlet tube was brazed to the filter can. SPX Filtran confirmed that the filters with leaks identified were manufactured in late 2004 and 2005 using filter cans with angled inlet tubes that had been manually brazed to the filter can by SPX Filtran's supplier, CCHT. SPX Filtran has not yet completed testing of the Model F350 filters returned from WIX.

V. Identify the Remedy

8. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

SPX Filtran has identified the following remedies:

1. SPX Filtran is working with its customer, WIX, to recall all Model F350 and Model F300 filters that have not yet been sold to end-users. SPX Filtran intends to destroy those filters to ensure that they are not resold.
2. Require CCHT to use new brazing and control processes to identify filter cans with defective brazing welds.
3. Upgrade SPX Filtran's internal inspection and testing process to identify filters with defective brazing welds or leaks.

SPX Filtran will take additional steps, if any, as may be advised based on guidance from NHTSA.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

Manufacturing date code after September 2005.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

Please see response to Questions 6 and 8 above. The Model F300 and Model F350 with manual brazing welds have been discontinued. They will be replaced with new filters using an alternative brazing process.

VI. Identify the Recall Schedule

Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.

As described in more detail in response to Number 6 above, on September 16, 2005, Filtran began working with its distributor, WIX, to recover all unsold Model F350 fuel filters that were shipped since June 2005.

On September 27, 2005, SPX Filtran sent a letter to WIX confirming the decision to expand the recall to include all Model F350 and Model F300 filters.

SPX Filtran anticipates at least one potential problem in implementing a recall. To the extent the filters have been sold by retailers to end-users, it will not be possible to identify the end-users. SPX Filtran welcomes guidance from NHTSA with respect to any additional steps that NHTSA believes should be taken with respect to providing notice to potential end-users.

VII. Furnish Recall Communications

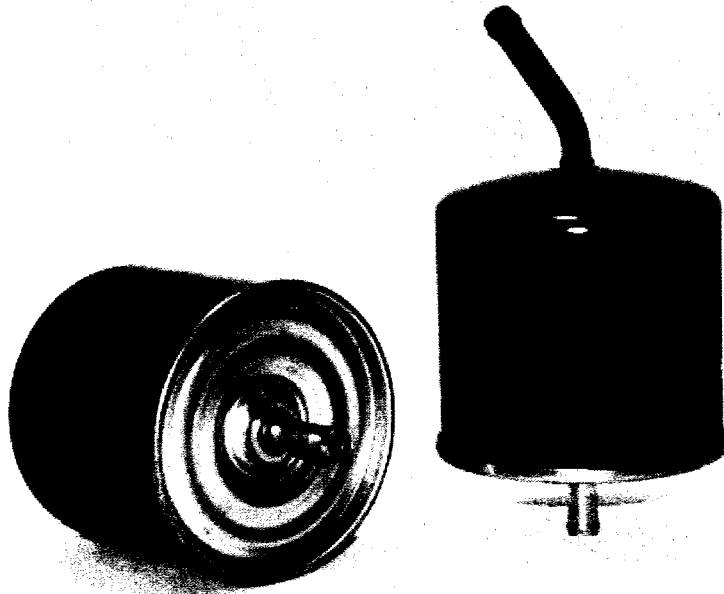
9. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) for review prior to mailing.*

SPX Filtran has furnished the following recall communications:

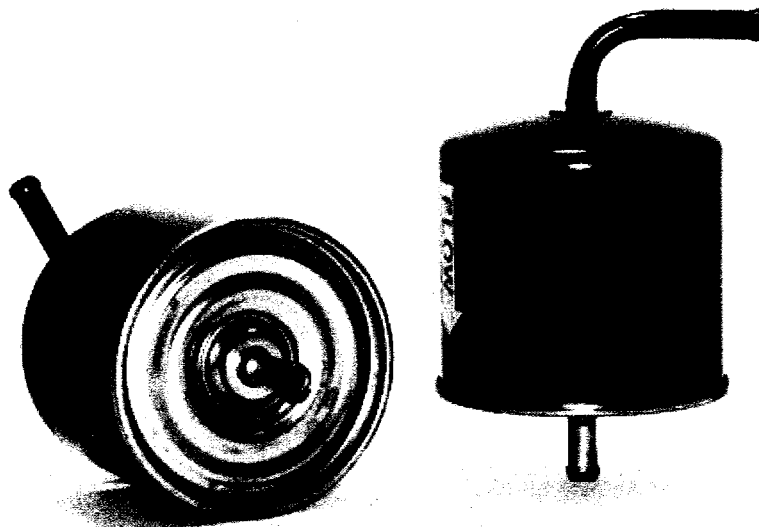
September 16, 2005 letter from SPX Filtran to its distributor, attached as Exhibit D.

September 27, 2005 letter from SPX Filtran to its distributor, attached as Exhibit E.

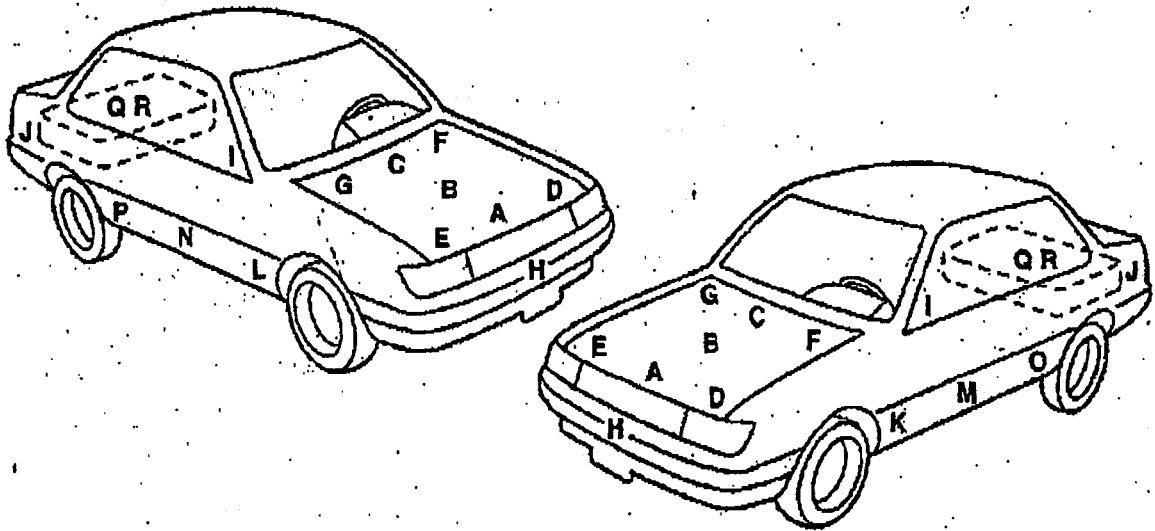
SPX FILTRAN MODEL NUMBER
800F350-S1:



SPX FILTRAN MODEL NUMBER
800F300-S2:



FUEL FILTER LOCATOR CHART



Engine Compartment (EC):

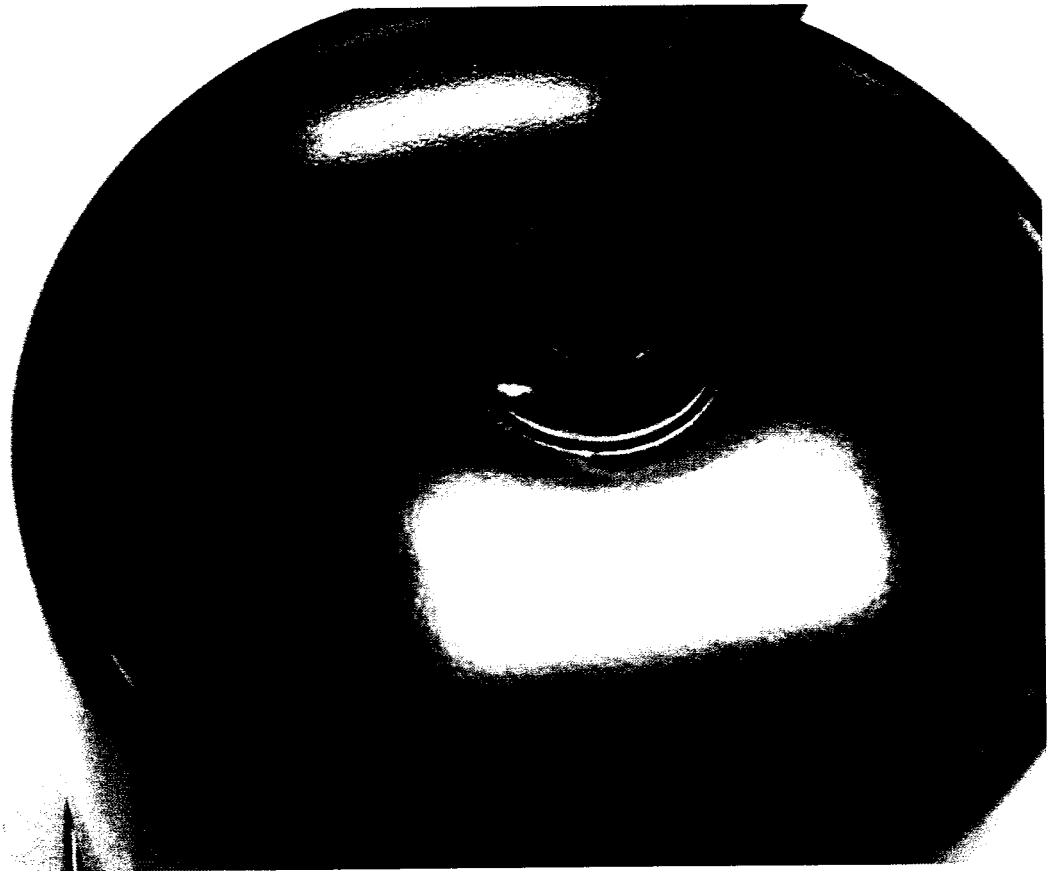
F = Front
 C = Center
 R = Rear
 PS = Pass. Side
 DS = Driver Side

Frame (FR):

F = Front
 C = Center
 R = Rear
 PS = Pass. Side
 DS = Driver Side
 FTA = Fuel Tank Area
 IFT = In Fuel Tank

A = ECF = ENGINE COMPARTMENT FRONT
 B = ECC = ENGINE COMPARTMENT CENTER
 C = ECR = ENGINE COMPARTMENT REAR
 D = ECFDS = ENGINE COMPARTMENT FRONT DRIVER SIDE
 E = ECFPS = ENGINE COMPARTMENT FRONT PASSENGER SIDE
 F = ECRDS = ENGINE COMPARTMENT REAR DRIVER SIDE
 G = ECRPS = ENGINE COMPARTMENT REAR PASSENGER SIDE
 H = FRF = FRAME FRONT
 I = FRC = FRAME CENTER
 J = FRR = FRAME REAR
 K = FRFDS = FRAME FRONT DRIVER SIDE
 L = FRFPS = FRAME FRONT PASSENGER SIDE
 M = FRCDS = FRAME CENTER DRIVER SIDE
 N = FRCPS = FRAME CENTER PASSENGER SIDE
 O = FRRDS = FRAME REAR DRIVER SIDE
 P = FRRPS = FRAME REAR PASSENGER SIDE
 Q = FTA = FUEL TANK AREA
 R = IFT = IN FUEL TANK

PUDDLING VISIBLE AT THE
LOCATION OF THE BRAZING WELD:



800F350-S1 MODEL

SPX FILTRAN

875 Seegers Road
 Des Plaines, IL 60016-3098
 Phone (847) 635-6670
 Fax (847) 635-7724

September 16, 2005

Mr. Ron Gower
 Affinia Group
 Wix Filters
 P.O. BOX 1967
 Gastonia, NC 28053-1967

NOTICE OF POTENTIAL SAFETY ISSUE

Ron,

This letter is to follow-up on our discussion on September 13. It was good to talk with you, and we appreciate the time you spent with Greg Wagner and me. The following is a summary of our discussion:

- We have determined that certain fuel filters manufactured at Filtran's Lugoff, S.C. plant may develop a leak that could create a potential safety issue due to a process problem at a supplier's operation.
- The affected parts are identified with the model number 800F350-S1.
- We have shipped 5,184 parts of 800F350-S1 with a WIX, NAP, & CAR prefix. The build and ship dates with quantities are:

Wix Part #	SPX Filtran #	Produced Date	Shipped Date	Quantity
33099	WIX800F350-S1	6-27-2005	6-27-2005	864
33099	WIX800F350-S1	6-27-2005 7-14-2005 8-09-2005	8-9-2005	864
33099	WIX800F350-S1	6-27-2005 7-14-2005 8-09-2005	8-26-2005	864
3099	NAP800F350-S1	6-27-2005	6-28-2005	864
3099	NAP800F350-S1	6-27-2005 7-14-2005	7-29-2005	864
86099	CAR800F350-S1	7-14-2005	7-14-2005	864
TOTAL SHIP			6	5,184

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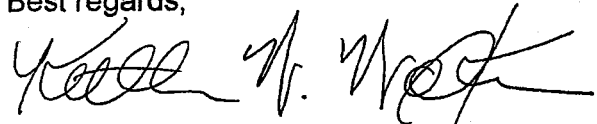
Exhibit D

- We have 3,500 replacement parts we can ship to Affinia by Monday 9/19/05, and we will be able to replace the balance within 5 days of the return of the requested parts.
- Although we have not received any reports of fires or injuries caused by any leaking filters, we are concerned that a leak could potentially lead to a fire or other safety problem.
- Accordingly to prevent a potential safety problem from occurring, we ask you to take the following action:
 1. Place a hold on all inventories of the parts listed above and ship those inventories back to SPX Filtran in exchange for new replacement filters.
 2. Identify to what extent the parts listed above have been sold to other buyers or users. Please identify each buyer and the number of filters purchased by each. SPX Filtran will pay return freight from these locations.
 3. Work with SPX Filtran to determine the best way to notify any buyers or end-users of the need not to sell or use filters with the 800F350-S1 model number.
 4. Work with SPX Filtran to replace the filters with new filters.

Ron, we appreciate your assistance in getting this potential safety problem taken care of as fast as possible. We were very happy to hear your response of holding all inventories in your facility and to working with us to get the suspect parts back to SPX Filtran expeditiously. As promised, here is the return goods authorization number RA 05-002.

Thanks again for all your help.

Best regards,



Keith W. Walker
Vice President of Sales and Marketing-Aftermarket

PRIVILEGED AND CONFIDENTIAL

SPX FILTRAN

7 Park Hill Drive
Lugoff, SC 29078
Phone (803) 438-2781
Fax (803) 438-2777

September 27, 2005

Mr. Larry Rainwater
Affinia Group
WIX Filters
P.O. BOX 1967
Gastonia, NC 28053-1967

7003 2260 0003 4181 7152

Re: Fuel Filter Recall
All Model "F350" and "F300" Filters
WIX Numbers: F350: (WIX)33099, (NAP)3099, (CAR)86099
F300: (WIX)33471, (NAP)3471, (CAR)86471

Larry,

Thank you for your continuing cooperation with the fuel filter recall. Based on our recent discussions, this letter addresses the need to expand the recall to cover all SPX Filtran fuel filters with angled inlet tubes welded by CCHT. Those filters have either a 45-degree inlet tube (Filtran Model F350) or a 90-degree inlet tube (Filtran Model F300).

The WIX numbers for the Model F350 are (WIX)33099, (NAP)3099, and (CAR)86099. The WIX numbers for the Model F300 are (WIX)33471, (NAP)3471, and (CAR)86471.

The following summarizes our current understanding of the issue:

- Our September 16, 2005 letter initially identified units of SPX Filtran Model "F350" (45-degree inlet tube) filters that had been welded by CCHT and shipped to WIX since June 2005. We understand that WIX is working to recover those filters and return them to SPX Filtran for additional inspection and testing.
- On September 21, 2005, WIX identified additional Model F350 that exhibited defective brazing. Because those filters were produced before June 2005, we have expanded the recall to include all F350 filters with inlet tubes brazed by CCHT. We understand that WIX is working to recover all Model F350 45-degree filters and return them to SPX Filtran for additional inspection and testing. The WIX numbers for these filters are (WIX)33099, (NAP)3099, and (CAR)86099.
- SPX Filtran has confirmed that CCHT has used the same manual brazing method on both the F350 (45-degree inlet tube) and F300 (90-degree inlet tube) filters. SPX Filtran has identified faulty brazing welds on certain F300 (90-degree) filters that SPX Filtran received from CCHT beginning with a July 15, 2005 shipment from CCHT. SPX stopped production of those filters before they were sent. In light of that

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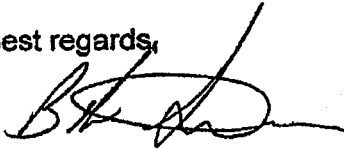
Exhibit E

discovery, and because CCHT uses the same manual brazing process to weld the F300 and the F350 angled filters, we have expanded the recall to include all Model F300 filters. We understand that WIX is working to recover all Model F300 90-degree filters and return them to SPX Filtran for additional inspection and testing. The WIX numbers for these filters are (WIX)33471, (NAP)3471, and (CAR)86471.

- SPX Filtran and WIX have conducted additional testing to confirm that filters with straight inlet tubes brazed by CCHT do not have the brazing problem experienced with the F300 and F350 angled-tube filters. Our testing did not detect any brazing problems with those filters.
- We are working with CCHT to review its brazing and control processes to ensure that no filters with defective brazing are delivered to SPX Filtran. SPX Filtran also is reviewing its own control process to ensure that defective filters are not delivered to WIX. We welcome your input on these issues.
- Based on the test results for the F350 and F300 filters, we will work with you and NHTSA to determine the appropriate remedy.

Larry, we appreciate the continued assistance of WIX personnel in getting this issue resolved.

Best regards,



Bob Somers
Plant Manager, SPX Filtran

cc: Ron Gowers
Paul Avery
Keith Walker