

05E-065 (17pgs.)

JENNER & BLOCK

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September 21, 2005

R. Douglas Rees
Tel 312 923-2837
Fax 312 840-7237
drees@jenner.com

**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:

RECEIVED
NVS-215
2005 SEP 22 A 11:53
OFFICE OF
DEFECTS INVESTIGATION

On Friday, September 16, 2005, I telephoned Kelly Schuler of your office to inform her of a possible defect involving a fuel filter manufactured in part by our client, SPX Filtran. She asked me to send you a Section 573 report with a copy to her. That report is enclosed for your review.

As the report indicates, internal testing performed by SPX Filtran has recently 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.

SPX Filtran requests that this report and the enclosed documents be treated as confidential for all purposes to the fullest extent permitted by law, including without limitation in connection with any request for disclosure of information under the Freedom of Information Act. This report is not intended to, and does not, waive any privilege or protection available SPX Filtran.

Sincerely,



R. Douglas Rees

cc: 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 faulty brazing welds that could allow the fuel filter to develop a leak, particularly when placed under pressure. On September 16, 2005, SPX Filtran initiated an effort to identify and recall the affected filters to allow them to be inspected and tested for compliance.

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

Date this report was prepared: September 21, 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

**Confidential Treatment Requested Pursuant To
Freedom of Information Act, 17 CFR 200.83**

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 WIX® 33099 Fuel Filter; CARQUEST 86099 Fuel Filter; and NAPA 3099 Fuel Filter.

Make: Fuel Filter **Model:** 800F350-S1

(See illustrations and photo attached as Exhibits A, B, and C.)

Part Numbers:

SPX Filtran number WIX800F350-S1 (WIX number 33099)

SPX Filtran number NAP800F350-S1 (NAPA number 3099)

SPX Filtran number CAR800F350-S1 (Carquest number 86099)

Function: Fuel filter used in passenger automobiles.

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

SPX Filtran assembles and manufactures 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.

The Model 800F350 fuel filter is distinguished by having a 45-degree angle on the inlet tube of the filter. (See illustration attached as Exhibit A.) The 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). 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 also assembles and manufactures a similar filter (Model 800F300-S1) that is distinguished by having a 90-degree angle on the inlet tube of the filter. The Model "F300" is an aftermarket replacement fuel filter for use in Mazda 929 (V-6 engine) automobiles produced from 1988-1991. Like the Model F350, the inlet tube on the Model F300 is welded by CCHT. Inspections and testing by SPX Filtran have revealed welding problems in the Model F300 that are similar to the problems found in Model F350. SPX Filtran and WIX are now checking their records to determine the extent to which F300 filters with faulty welds have been shipped.

II. Identifying the Recall Population

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

<u>Model Year</u>		<u>Number of Items Potentially Involved</u>
800F350-S1	2005	5,184
Total Number Potentially Affected by the Recall:		5,184

Of the 5,184 filters identified, SPX Filtran's distributor, WIX Filters (Affinia Group), has pulled from its inventory 2,862 unsold filters that WIX is returning to SPX Filtran for further inspection and testing. The remaining 2,322 fuel filters have been sold by WIX to retailers such as NAPA Auto Parts and Carquest Auto Parts. Of the remaining 2,322 filters that WIX delivered to the field, WIX has confirmed that 1,002 were shipped to WIX vendors, 864 were shipped to Carquest, and 456 were shipped to NAPA. WIX is working with its customers to identify how many of those filters can be recovered before they are sold to end-users.

In June and July 2005, SPX Filtran shipped 1,728 units of Model 800F300 (90-degree) filters to WIX. SPX Filtran and WIX are currently investigating to what extent those F300 units (or any other units welded by CCHT) have faulty welds that may require them to be recalled.

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

Model 800F350 (45-degree)

On September 9 and 10, 2005, SPX Filtran inspected all 3,727 unsold units of the Model F350 fuel filters still in its inventory. Of the 3,727 units inspected, 207 units (5.5%) were found with "puddled" brazing welds. SPX Filtran considers all of those units subject to potential leak.

Model 800F300 (90-degree)

On September 9 and 10, 2005, SPX also inspected and tested 1,265 unsold units of the Model F300 fuel 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 considers all of those units subject to potential leak.

F350 and F300 Models Without "Puddled" Welds

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.

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 Question 6 below, on September 7, 2005, during its routine internal inspections and leak testing of fuel filters, SPX Filtran discovered that several Model F300 and F350 filters exhibited "puddled" brazing welds where CCHT had welded the inlet tube to the filter can. Further handling of the filters 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 immediately stopped shipments of all Model F300 and F350 filters and investigated when the filters had been delivered to SPX Filtran by CCHT. CCHT expressed its belief that the brazing weld problems were limited to batches of filters sent to SPX Filtran beginning in June 2005. Based on that representation, SPX Filtran identified how many filters it received from CCHT since June 2005, and how many of those it shipped to its distributor, WIX. (See charts on following page.) Because of concerns that the welding problem may in fact extend to filters welded by CCHT before June 2005, the following charts show shipments received from CCHT throughout 2005.

SPX Filtran's records show that CCHT's first shipment of filters it welded since June 2005 was a shipment of 588 units of Model F350 filters sent to SPX on June 17, 2005. SPX Filtran received its last shipment of Model F350 filters from CCHT on September 2, 2005. However, SPX Filtran has not shipped any filters to WIX since its August 9, 2005 shipment of F350 filters.

SPX Filtran's records also show that CCHT's first shipment of F300 filters welded since June 2005 was a shipment of 1,870 filters sent to SPX Filtran on July 15, 2005. Although SPX Filtran shipped F300 filters to WIX on June 28 and July 15, 2005, those appear to be filters that CCHT welded before June 2005.

On September 21, 2005, WIX informed SPX Filtran that it has identified filters shipped before June 2005 that appear to have faulty welds. If investigation confirms that filters welded by CCHT before June 2005 have faulty welds, then those filters may need to be subject to a recall.

The manufacturing and shipping history of the Model F350 and Model F300 filters is shown on the charts provided on the next page.

Manufacturing and Shipments of Model 800F350-S1

Date CCHT shipped to SPX Filtran	Qty shipped	Date SPX Filtran produced	Qty produced	Date SPX Filtran shipped to WIX	Qty shipped to WIX	Model
		2/9/05	58			
		5/23/05	650	6/13/05	702	NAP800F350-S1
6/17/05	588	6/27/05		6/27/05	864	WIX800F350-S1
6/21/05	1692	6/27/05		6/28/05	864	NAP800F350-S1
6/22/05	1850	7/14/05		7/14/05	864	CAR800F350-S1
6/23/05	860	7/14/05		7/29/05	864	NAP800F350-S1
7/15/05	522	8/9/05		8/9/05	864	NAP800F350-S1
7/29/05	1568	8/9/05		8/9/05	864	WIX800F350-S1
8/2/05	784					
8/3/05	1158					
9/2/05	1588					
Totals	11318				5184 ¹	

Manufacturing and Shipments of Model 800F300-S2

Date CCHT shipped to SPX Filtran	Qty shipped	Date SPX Filtran produced	Qty produced	Date SPX Filtran shipped to WIX	Qty shipped to WIX	Model
		12/8/04	23			
		6/27/05	660			
TBD		6/28/05	208	6/28/05	864	WIX800F300-S2
TBD		6/28/05	505	7/15/05	864	NAP800F300-S2
7/15/05	1870					
7/15/05	481					
8/3/05	245					
9/2/05	980					
Totals	3576		1396		1728	

¹ Excludes the 702 units shipped to WIX on June 13, 2005 pending further investigation of filters welded by CCHT before June 2005.

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.

SPX Filtran believes that the welds on some of the fuel filters may have been improperly brazed by SPX Filtran's supplier, CCHT. The welds are located where the inlet tube enters the filter. In some instances, the condition may be revealed by "puddles" that form from brazing material that has not been properly applied by CCHT. (See photo attached as Exhibit C.) The condition also may be revealed if the inlet tube can be easily twisted off by hand.

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

As stated above, SPX Filtran believes the condition was caused by 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 CCHT had welded the inlet tube to the filter can. Manual handling of the filters also showed 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 the affected filters 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. CCHT expressed its belief that the brazing weld problems were limited to batches of filters sent to SPX Filtran beginning in June 2005. Based on that representation, SPX Filtran began its effort to identify how many filters it had received from CCHT since June 2005, and how many of those it had shipped to its distributor, WIX. (See charts on page 6.) Also on September 8, 2005, SPX Filtran 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 press CCHT to perform its own review of its welding 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. As a result of that call, WIX initiated a stop order to prevent further shipments of the filters.

**Confidential Treatment Requested Pursuant To
Freedom of Information Act, 17 CFR 200.83**

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 has informed SPX Filtran that WIX immediately 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.

Since September 16, 2005, SPX Filtran has gathered information for this report. During that process, on September 21, 2005, WIX informed SPX Filtran that it has identified filters shipped before June 2005 that appear to have faulty welds. If further investigation confirms that filters welded by CCHT before June 2005 have faulty welds, then those filters may need to be subject to a recall.

SPX Filtran also continues to work with its supplier, CCHT, and its distributor, WIX, to take appropriate steps to remedy the situation. As noted, SPX Filtran has not received any warranty claims or any reports of fires, injuries, or other 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.

On September 9 and 10, 2005, SPX Filtran inspected all 3,727 unsold 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 considers all of those units subject to potential leak.

SPX Filtran also inspected all 1,265 unsold units of Model "F300" (90-degree) filters. Of the 1,265 units inspected, 239 units (19%) were found with the "puddled" brazing welds indicating a possible leak. SPX Filtran considers all of those units subject to potential 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.

As noted above, although SPX Filtran has not received any warranty claims or any reports of fires, injuries, or other incidents caused by leaking fuel filters, SPX Filtran

intends to recall, re-inspect, and retest all Model F350 filters that can be recovered from its distributor or its distributor's customers.

With respect to any Model F350 or Model F300 filters welded by CCHT before June 2005, SPX Filtran is working with CCHT and WIX to determine if any of those models were shipped to WIX or to WIX customers with faulty welds.

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 three primary remedies:

1. SPX Filtran and its distributor are working to recall all of the potentially defective Model F350 filters. Once recovered, SPX Filtran will do the following: (a) visually inspect each filter; (b) subject each filter to a torque test to confirm the strength of the brazing weld that attaches the inlet tube to the filter; (c) subject each filter to a leak test to confirm that the filter will not leak under pressure. If the filter passes these tests, SPX Filtran will place an identifying mark on the box and the filter before the filter is allowed to be resold.
2. Confirm new welding process by CCHT to prevent defective or non-conforming brazing welds. The new process will include the use of a brazing ring to apply the brazing material to the weld. This process replaces the manual brazing process that CCHT used to weld the inlet tubes to the filters cans.
3. Confirm to what extent Model F350 and Model F300 filters welded and shipped by CCHT to SPX Filtran before June 2005 show faulty or "puddled" brazing welds. Take appropriate action based on these findings.

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.

All recalled filters that pass the inspections and tests described above will be distinguished by a white mark placed on the inlet end of the filter. The box will be distinguished with a green dot.

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 Question 6 above.

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 fuel filters that were shipped prior to identification of the potential defect.

Of the 5,184 filters SPX Filtran delivered to WIX, WIX identified 2,862 unsold filters in WIX's inventory. WIX is returning these filters to SPX Filtran for further testing.

Of the remaining 2,322 filters that WIX delivered to the field, WIX has confirmed that 1,002 were shipped to WIX vendors, 864 were shipped to Carquest, and 456 were shipped to NAPA auto parts. WIX is working with its customers to identify how many of those filters can be recovered before they are sold to end-users.

WIX also intends to provide an appropriate bulletin to its customers.

SPX Filtran welcomes guidance from NHTSA with respect to any additional steps that NHTSA believes should be taken.

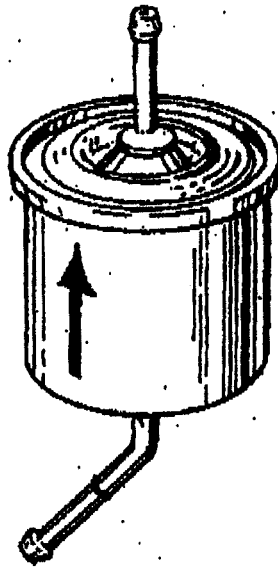
VII. Furnish Recall Communications

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.

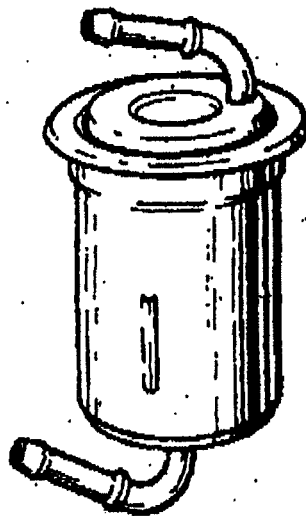
Please see letter from SPX Filtran to its distributor, attached as Exhibit D.

SPX Filtran does not yet have a copy of the notice WIX has provided.

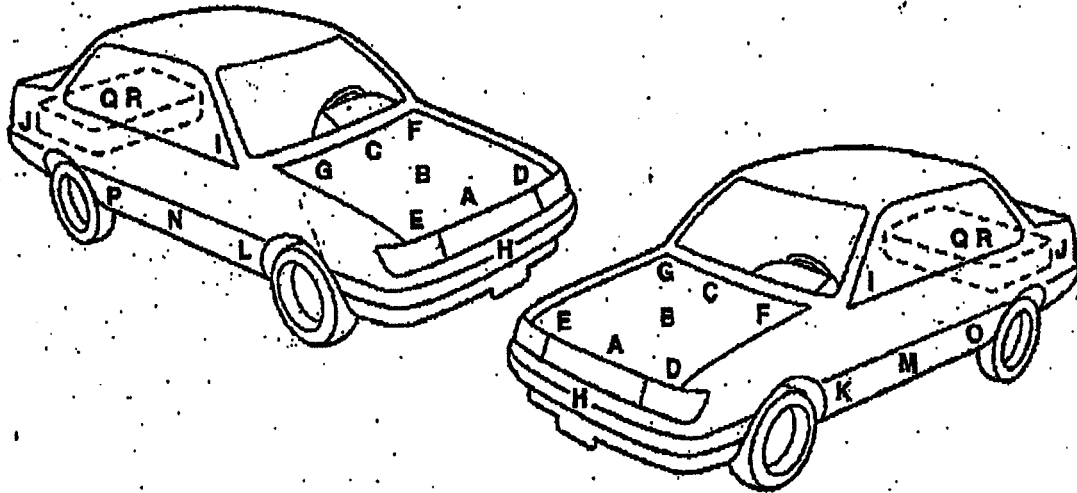
SPX FILTRAN MODEL NUMBER
800F350-S1



SPX FILTRAN MODEL NUMBER
800F300-S2



FUEL FILTER LOCATOR CHART



Engine Compartment (EC):

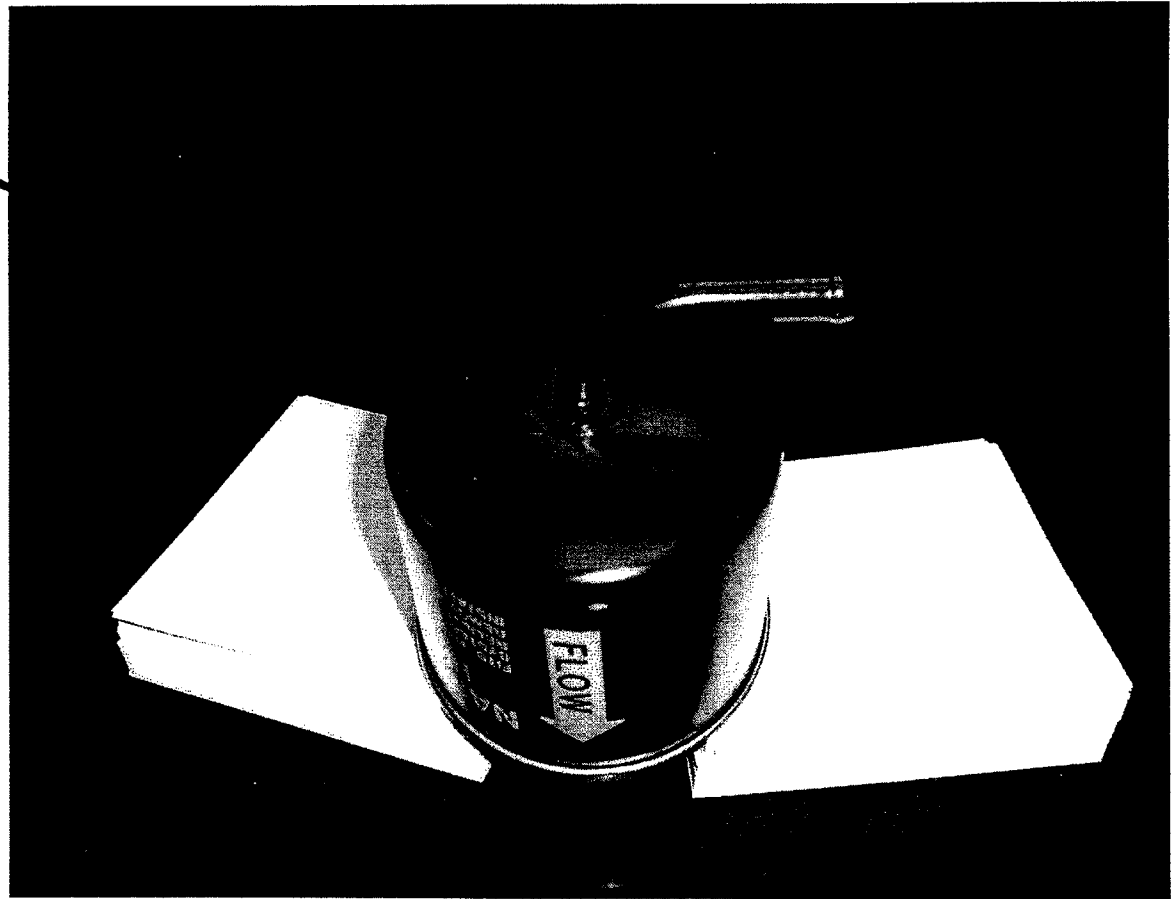
F = Front
 C = Center
 R = Rear
 PS = Pass. Side
 DS = Driver Side

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

Puddle - looks like
A bubble under paint





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

SPX Filtran – Building On A Tradition Of Excellence – TS-16949 Certified

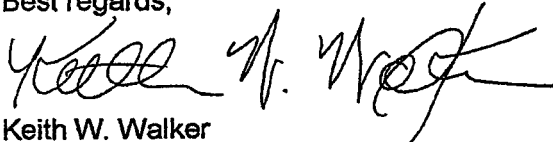
Exhibit D

- 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