

06E-044  
(16 pgs.)

Safety Defect and Noncompliance Report Guide for Equipment

**PART 573 Defect and Noncompliance Responsibility and Reports'**

On April 11, 2006, J & A Auto Accessories determined that a noncompliance with Federal Motor Vehicle Safety Standard No. 108 exists in items of motor vehicle equipment listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573, Defect and Noncompliance Responsibility and Reports.

Date this report was prepared: April 13, 2006, amended April 29, 2006

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.

Sonar Auto Parts Co., Ltd.; Milton Yang, No. 427 Sec. 2 Wen Hua Road, Panchiao, Taipei, Taiwan, R.O.C. 886-2-2256-1718 (fax 886-2-2252-1036)

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

Milton Yang at Sonar Auto Parts 886-2-2256-1718 (fax 886-2-2252-1036);

Name and Title of Person who prepared this report. Charles R. Sutton, Law Offices of Roger C. Hsu, attorney for J & A Auto Accessories

Signed:



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OFFICE OF DEFECTS  
INVESTIGATION

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1 Each manufacturer must furnish a report, to the Associate Administrator for Enforcement, for each defect or noncompliance condition which relates to motor vehicle safety.

This guide was developed from 49 CFR Part `573, "Defect and Noncompliance Responsibility and Reports" and also outlines information -currently requested. Any questions, please consult the. complete Part 573 or contact Mr. George Person at '(202) 366-5210 or by FAX at (202) 366-7\$82.

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: Combination headlamp**

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Make: Honda Model: Accord

Part Number: NTR2014 Size: N/A

Function: Illumination

Model Years Involved: '90 - '93

Other information which characterizes/distinguishes the items of equipment to be recalled: 94-97 Honda Accord Projector CHR/Clear

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Make: Honda Model: Accord

Part Number: NTR2014B Size: N/A

Function: Illumination

Other information which characterizes/distinguishes the items of equipment to be recalled: 94-97 Honda Accord Projector BLK/Clear

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**Make: Honda Model: Accord**

**Part Number: NTR2015 Size: N/A**

**Function: Illumination**

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

recalled: 94-97 Honda Accord Projector CHR/Blue

Make: Honda    Model: Accord  
Part Number: NTR2015B    Size: N/A  
Function: Illumination  
Other information which characterizes/distinguishes the items of equipment to be recalled: 94-97 Honda Accord Projector BLK/Blue

Make: Honda    Model: Accord  
Part Number: NTR205    Size: N/A  
Function: Illumination

Other information which characterizes/distinguishes the items of equipment to be recalled: 98-02 Honda Accord 2-beam projector CHR/Blue

Make: Honda Model: Accord

Part Number: NTR205B Size: N/A

Function: Illumination

Other information which characterizes/distinguishes the items of equipment to be recalled: 98-02 Honda Accord 2-beam Projector BLK/Blue

Make: Honda Model: Civic

Part Number: NTR2053 Size: N/A

Function: Illumination

Other information which characterizes/distinguishes the items of equipment to be recalled: 92-95 Honda Civic 2/3 DR CHR/Blue

Make: Honda Model: Civic

Part Number: NTR2053B Size: N/A

Function: Illumination

Other information which characterizes/distinguishes the items of equipment to be recalled: 92-95 Honda Civic 2/3 DR BLK/Blue

Make: Honda Model: Civic

Part Number: NTR2054 Size: N/A

Function: Illumination

Other information which characterizes/distinguishes the items of equipment to be recalled: 92-95 Honda Civic 2/3 DR CHR/Clear

Make: Honda Model: Civic

Part Number: NTR2054B Size: N/A

Function: Illumination

Other information which characterizes/distinguishes the items of equipment to be recalled: 92-95 Honda Civic 2/3 DR BLK/Clear

Make: Honda Model: Accord

Part Number: NTR206 Size: N/A

Function: Illumination

Other information which characterizes/distinguishes the items of equipment to be recalled: 98-02 honda Accord 2-beam projector CHR/Clear

Make: Honda Model: Accord

Part Number: NTR206B Size: N/A

Function: Illumination

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

recalled: 98-02 Honda Accord 2-beam projector BLK/Clear

Make: BMW Model: 3 Series 2 Door

Part Number: NTR2063 Size: N/A

Function: Illumination

Other information which characterizes/distinguishes the items of equipment to be recalled: 92-98 BMW 3 series 2DR CHR/Clear

Make: BMW Model: 3 Series 2DR

Part Number: NTR2063B Size: N/A

Function: Illumination

Other information which characterizes/distinguishes the items of equipment to be recalled: 92-98 BMW 3 Series 2DR BLK/Clear

Make: BMW Model: 3 series 2DR

Part Number: NTR2064 Size: N/A

Function: Illumination

Other information which characterizes/distinguishes the items of equipment to be recalled: 92-98 BMW 3 series 2DR CHR/Blue

Make: BMW Model: 3 Series 2 DR

Part Number: NTR2064B Size: N/A

Function: Illumination

Other information which characterizes/distinguishes the items of equipment to be recalled: 92-98 BMW 3 Series 2DR BLK/Blue

Make: BMW Model: 3 Series 4DR

Part Number: NTR2065 Size: N/A

Function: Illumination

Other information which characterizes/distinguishes the items of equipment to be recalled: 92-98 BMW 3 Series 4DR CHR/Clear

Make: BMW Model: 3 Series 4DR

Part Number: NTR2065B Size: N/A

Function: Illumination

Other information which characterizes/distinguishes the items of equipment to be recalled: 92-98 BMW 3 Series 4DR BLK/Clear

Make: BMW Model: 3 Series 4DR

Part Number: NTR2066 Size: N/A

Function: Illumination

Other information which characterizes/distinguishes the items of equipment to be recalled: 92-98 BMW 3 Series 4DR CHR/Blue

Make: BMW Model: 3 Series 4DR

Part Number: NTR2066B Size: N/A

Function: Illumination

**Other information which characterizes/distinguishes the items of equipment to be recalled: 92-98 BMW 3 Series 4DR BLK/Blue**

**Make: Honda      Model: Civic**

**Part Number: NTR209      Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled: 96-98 Honda Civic 2-beam projector CHR/Blue**

**Make: Honda      Model: Civic**

**Part Number: NTR210      Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled: 96-98 Honda Civic 2-beam projector CHR/Clear**

**Make: Honda      Model: Civic**

**Part Number: NTR211      Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled: 99-00 Honda Civic 2-Beam Projector CHR/Blue**

**Make: Honda      Model: Civic**

**Part Number: NTR211B      Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled: 99-00 Honda Civic 2-beam projector BLK/Blue**

**Make: Honda      Model: Civic**

**Part Number: NTR212      Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled: 99-00 Honda Civic 2-Beam projector CHR/Clear**

**Make: Honda      Model: Civic**

**Part Number: NTR212B      Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled: 99-00 Honda Civic 2-beam projector BLK/Clear**

**Make: Mitsubishi      Model: Eclipse**

**Part Number: NTR213      Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled: 97-99 Mitsubishi Eclipse CHR/Blue**

**Make: Mitsubishi      Model: Eclipse**

**Part Number: NTR214      Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled: 97-99 Mitsubishi Eclipse CHR/Clear**

**Make: Mitsubishi      Model: Eclipse**

**Part Number: NTR215      Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled: 97-99 Mitsubishi Eclipse BLK/Blue**

**Make: Mitsubishi      Model: Eclipse**

**Part Number: NTR216      Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled: 97-99 Mitsubishi Eclipse BLK/Clear**

**Make: Honda      Model: Civic**

**Part Number: NTR237      Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled: 01-03 Honda Civic 2/4 DR BLK/Clear**

**Make: Honda      Model: Civic**

**Part Number: NTR238      Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled: 01-03 Honda Civic 2/4DR CHR/Clear**

**Make: Honda      Model: Civic**

**Part Number: NTR251      Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled: 96-98 Honda Civic BLK/Blue**

**Make: Honda      Model: Civic**

**Part Number: NTR252      Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled: 96-98 Honda Civic BLK/Clear**

**Make: Honda      Model: Civic**

**Part Number: NTR269      Size: N/A**

**Function: Illumination**

**Other information which characterizes/distinguishes the items of equipment to be recalled: 01-03 Honda Civic 2/4DR BLK/Blue**

**Make: Honda      Model: Civic**



Part Number:   NTR270   Size: N/A  
Function: Illumination  
Other information which characterizes/distinguishes the items of equipment to be recalled: 01-03 Honda Civic 2/4DR CHR/Blue

Make:  Honda  Model:  Civic   
Part Number:  NTR297  Size: N/A  
Function: Illumination  
Other information which characterizes/distinguishes the items of equipment to be recalled: 92-95 Honda Civic 4DR CHR/Clear

Make: NTR297B  Model: Civic   
Part Number:  NTR297B  Size: N/A  
Function: Illumination  
Other information which characterizes/distinguishes the items of equipment to be recalled: 92-95 Honda Civic 4DR BLK/Clear

Make:  Honda  Model: Civic   
Part Number:  NTR298  Size: N/A  
Function: Illumination  
Other information which characterizes/distinguishes the items of equipment to be recalled: 92-95 Honda Civic 4DR CHR/Blue

Make:  Honda  Model:  Civic   
Part Number:  NTR298B  Size: N/A  
Function: Illumination  
Other information which characterizes/distinguishes the items of equipment to be recalled: 92-95 Honda Civic 4DR BLK/Blue

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Widgets equipped with certain items of equipment from January 1,1996, through April 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period.

100%

**II. Identifying the Recall Population**

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

<b>Items Model</b>	<b>Year</b>	<b>Number of Potentially Involved</b>
NTR2014	94-97	43
NTR2014B	94-97	25
NTR2015	94-97	40
NTR2015B	94-97	27
NTR205	98-02	38
NTR205B	98-02	20
NTR2053	92-95	31
NTR2053B	92-95	17
NTR2054	92-95	21
NTR2054B	92-95	26
NTR206	98-02	12
NTR206B	98-02	22
NTR2063	92-98	1
NTR2063B	92-98	0
NTR2064	92-98	1
NTR2064B	92-98	0
NTR2065	92-98	1
NTR2065B	92-98	2
NTR2066	92-98	3
NTR2066B	92-98	1
NTR209	96-98	59
NTR210	96-98	39

NTR211	99-00	37
NTR211B	99-00	23
NTR212	99-00	34
NTR212B	99-00	22
NTR213	97-99	68
NTR214	97-99	32
NTR215	97-99	36
NTR216	97-99	42
NTR237	38719	37
NTR238	38719	29
NTR251	96-98	61
NTR252	96-98	52
NTR269	38719	27
NTR270	38719	36
NTR297	92-95	53
NTR297B	92-95	61
NTR298	92-95	78
NTR298B	92-95	58
<b>Total Number Potentially Affected by the Recall: 1215</b>		

**4. Furnish the approximate percentage of the total number of items of equipment estimated to actually contain the defect or noncompliance: 100%**

**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:**

The aftermarket combination headlamps made to adapt to certain makes and models of automobiles were determined upon inspection to lack certain required amber side reflectors. We don't actually manufacture the lamps in question, and the dates given in this report reflect the dates of the makes and models of the particular automobiles to which these combination headlamps are to be attached, (which is how we have organized our part numbers and records for these particular parts).

**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 combination headlamps in question have eliminated one of the required functions of the combination headlamps they were designed to replace, to wit, they lack certain amber reflectors.

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

This concerns an absence of amber side reflectors on certain combination headlamps.

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

The absence of the amber reflectors will have the consequence that drivers of other cars will not see an amber reflector where there is supposed to be one on the particular combination headlamps in question. The result of this is that they will not be able readily to determine the direction of orientation of the cars fitted with the noncompliant combination headlamps.

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

There is not really a warning which will occur. It is visible from the outside of the lamp whether or not an amber reflector is present in the required position.

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

Sonar Auto Parts Co., Ltd.; Milton Yang, No. 427 Sec. 2 Wen Hua Road, Panchiao, Taipei, Taiwan, R.O.C.  
886-2-2256-1718 (fax 886-2-2252-1036)

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

Milton Yang at Sonar Auto Parts;

#### 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. This investigation does not concern a defect.**

**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.**

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Between February 16, 2006 and April 13, 2006 we did further research concerning the equipment found on the combination headlamps in question, and that found on the automobiles to which they were to be fitted, and we have determined that the combination headlamps listed herein are noncompliant as of April 13, 2006.

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#### V. Identify the Remedy

**8. A description of the manufacturer's program for remedying the defect or noncompliance. This program shall include a plan for reimbursing an owner or purchaser who incurred costs to obtain a remedy for the problem addressed by the recall within a reasonable time in advance of the manufacturer's notification of owners, purchasers and dealers, in accordance with §573.13 of this part. A manufacturer's plan may incorporate by reference a general reimbursement plan it previously submitted to NHTSA, together with information specific to the individual recall. Information required by §573.13 that is not in a general reimbursement plan shall be submitted in the manufacturer's report to NHTSA under this section. If a , manufacturer submits one or more general reimbursement plans, the manufacturer shall update each plan every two years, in accordance with §573.13. The manufacturer's remedy program and reimbursement plans will be available for inspection by the public at NHTSA headquarters.**

J & A Auto Accessories plans to conduct a recall under which it will offer to repurchase the noncompliant headlamp assemblies. It is prepared to begin the notification campaign promptly. However, since J & A Auto Accessories only sells its products at wholesale, it does not have information about the ultimate purchasers of the noncompliant headlamp assemblies. J & A Auto Accessories plans to contact its customers in the near future to offer to repurchase any inventory they may still have.

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J & A Auto Accessories will provide NHTSA with a copy of its proposed owner and dealer

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notification letters for its review prior to commencing the recall campaign.

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J & A Auto Accessories does not intend to include any language in that letter with respect to the reimbursement of owners who might have incurred costs to obtain a remedy for the identified noncompliance because, based on the absence of any complaints or other reports about this issue, it is extremely unlikely that any consumers will have replaced the headlamp assemblies in question with compliant assemblies containing amber side reflex reflectors, and thus they will not have incurred any costs that might warrant reimbursement under 49 CFR 573.6(c)(8) or 573.13.

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

We will repurchase combination headlamps lacking the required amber side reflectors from our customers.

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

The remedy component will be in the form of their money back so they can go buy replacement parts from a source of compliant parts.

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.

The product was discontinued. As far as production is concerned, we have ceased to import non-compliant headlamps and we do not manufacture any headlamps.

## VI. Identify the Recall Schedule

10. 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.

We propose to send a recall notice to our customers within two weeks. We will need about a month before we can actually begin the repurchase of the lamps because of the delay in the mails and our need to take this matter up with our overseas supplier.

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## VII. Furnish Recall Communications

11. 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.*

*The draft letter will be forthcoming within a reasonable time.*

Note: These documents are to be submitted separately from those provided in accordance with Part 579.5 requirements.

