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OFFICE OF THE ATTORNEY GENERAL
U.S. DEPARTMENT OF JUSTICE

06E-075
(4 pgs.)

August 25, 2006

Mr. Daniel C. Smith
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
400 7th Street, SW
Washington, DC 20590

Re: Notice of Noncompliance Pursuant to 49 CFR Part 573

Dear Mr. Smith,

On August 23, 2006, Guide Corporation decided that a noncompliance with Federal Motor Vehicle Safety Standard No. 108 exists in terms of the 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 Reports.

Product Identification

This recall involves Chevrolet Silverado replacement headlamps (Part No. 16526133 & 16526134) manufactured from January 1, 2006 to July 11, 2006. These lamps are identified by a date sticker located on the back of the reflector. Further identification should include the "GUIDE" trademark permanently molded into the lens.

Recall Population

17,268 replacement headlamps (16526133 – 7,426 pcs. / 16526134 – 9,842 pcs.) were manufactured during the time period outlined above. Guide is recalling 100 percent of these headlamps.

This population was determined by a review of photometry data taken on a due care basis in the lamp manufacturing facility. Guide's due care photometry showed full compliance until the end of the production year on December 22, 2005. Then on July 12, 2006, production was limited to molding reflectors from a single tool. Results verified photometry variation was reduced and the lamp was again fully compliant (Ref. Guide due care photometry attached).

Description of Noncompliance

Production variation during this time resulted in approximately 25 percent of the low beams having an aim shift up to 0.15 degrees. The aim of the low beam pattern was such that a potential noncompliance to FMVSS 108 photometry specifications existed (Ref. NHTSA Reports No. 108-CCITL-06-04 & 4B attached).

Chronology of Events

On April 24, 2006, Guide was copied on an electronic memo stating that recent testing performed by NHTSA on the above-referenced headlamps had incurred numerous test point failures that may indicate a noncompliance with FMVSS 108. Guide began an internal investigation at that time.

Guide received official notification of Office Action (OA-108-06327D) by NHTSA's Office of Vehicle Safety on June 28, 2006 and responded with the information requested on July 24, 2006. Subsequently, Guide met with NHTSA to review the response on August 15, 2006.

Following that meeting, Guide finalized the internal review and confirmed the noncompliance on August 23, 2006.

Remedy

Guide will voluntarily implement a safety recall campaign. Return of recalled lamps and replacement with remedied lamps will be free of charge.

The recalled lamps have the date (month - day) 1 - 1 through 7 - 11 stamped in the upper left corner of a white sticker located on the back of the reflector.

Recalled lamps will then be 100 percent inspected. Lamps that are found to be compliant with FMVSS 108 photometry requirements will be identified with a green sticker also located on the back of the reflector. All other lamps will be destroyed.

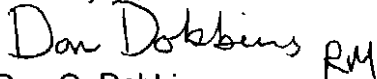
A drawing has been attached to identify the location of the stickers referenced above.

Recall Schedule

Guide intends to send out the recall notification by September 1, 2006.

This report was prepared by Rich Meyer, Director - Technical Support, who may be reached at telephone number (765) 221 - 6564 or FAX number (765) 221 - 6709.

Thank you,

Handwritten signature of Dan G. Dobbins in black ink, with the initials 'RM' written to the right.

Dan G. Dobbins

Executive Vice-President

Program Management, Product Engineering & Technical Support

Telephone number (248) 874 - 0355

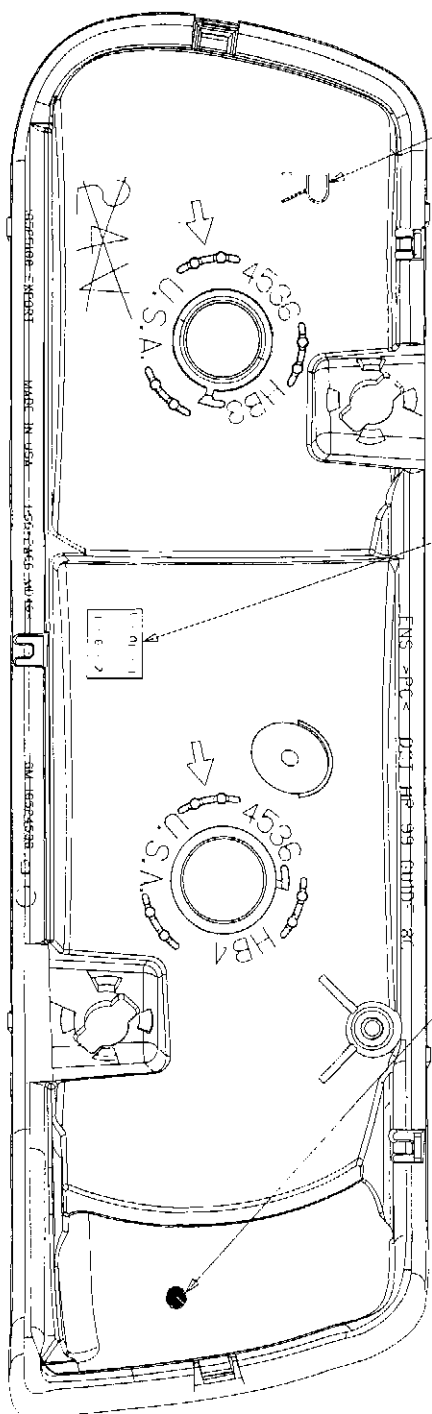
FAX number (248) 874 - 0596

DAY MONTH

1	1
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2	1

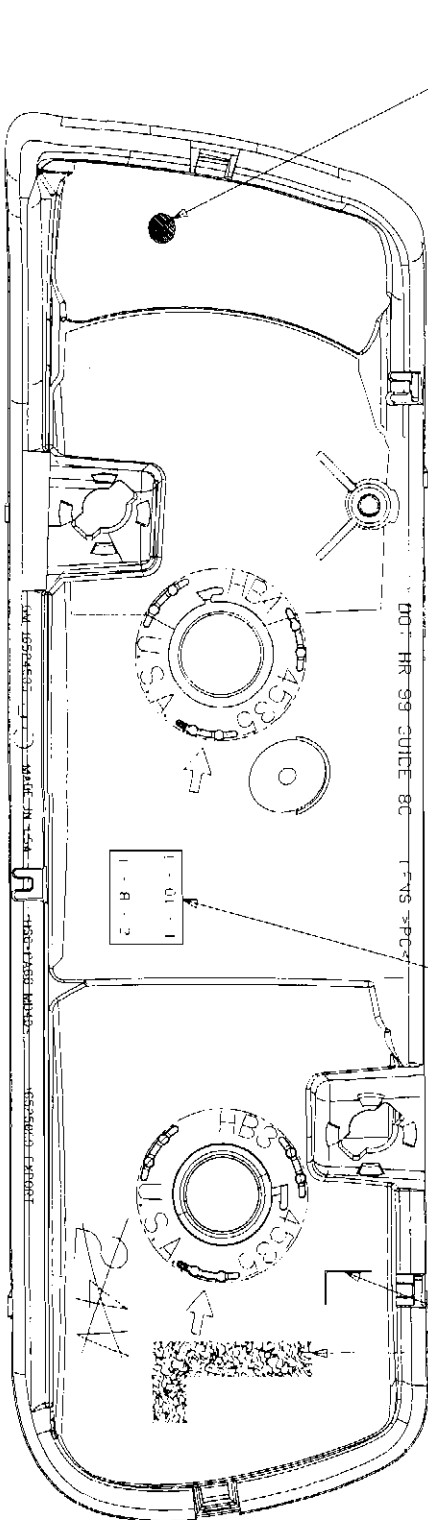


PLNCTES RIGHT HAND

CHEVROLET SILVERADO
REPLACEMENT HEAD-AMP
PART NUMBER 16525134

RECALLED LAMPS WILL HAVE
A WHITE STICKER WITH A
MONTH AND DAY OF
- - OI TRU 7 - 11
MONTH - DAY -

DEFINITION LEFT HAND



CHEVROLET SILVERADO
REPLACEMENT HEADLAMP
PART NUMBER 16526133