

Safety Defect and Noncompliance Report Guide for Vehicles  
PART 573 Defect and Noncompliance Report<sup>(1)</sup>

On January 9th, 2007, TYC [MFR] decided that (a defect which relates to motor vehicle safety)(a noncompliance with Federal Motor Vehicle Safety Standard No. 108) exists in the motor vehicles listed below, and 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: 01/09/07

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

1. Identify the full corporate name of the fabricating manufacturer of the vehicle being recalled. If the recalled vehicle is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. 0164.

Owner and manufacturer of equipment: TYC Brother Industrial Co. Ltd.  
Designated Agent: Genera Corporation, 26 Centerpointe Dr. Suite #100, La Palma, CA 90623.

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

Jackson Kwok, Vice President, Business Development Department

Telephone Number: 714-522-6688 Fax No.: 714-522-2233

Name and Title of Person who prepared this report.

Zak Tay

Asst. Manager, Product Management Department

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Signed: Jackson Kwok Zak Tay

**I. Identify the Vehicle Models Involved in the Recall**

**2. Identify the Vehicles Involved in the Recall, for each make and model or applicable vehicle line (provide illustrations or photographs as necessary to describe the vehicle), provide:**

Make(s): Honda                      Model: Accord                      Years Involved: 2003-2006

Production Dates: All Production dates    Beginning: \_\_\_\_\_    Ending: \_\_\_\_\_

VIN Range: Beginning: \_\_\_\_\_    Ending: \_\_\_\_\_

Vehicle Type: All Types                      Bodystyle: \_\_\_\_\_

**Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:**

Make(s): \_\_\_\_\_                      Model: \_\_\_\_\_                      Years Involved: \_\_\_\_\_

Production Dates: \_\_\_\_\_    Beginning: \_\_\_\_\_    Ending: \_\_\_\_\_

VIN Range: Beginning: \_\_\_\_\_    Ending: \_\_\_\_\_

Vehicle Type: \_\_\_\_\_                      Bodystyle: \_\_\_\_\_

**Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:**

Make(s): \_\_\_\_\_                      Model: \_\_\_\_\_                      Years Involved: \_\_\_\_\_

Production Dates: \_\_\_\_\_    Beginning: \_\_\_\_\_    Ending: \_\_\_\_\_

VIN Range: Beginning: \_\_\_\_\_    Ending: \_\_\_\_\_

Vehicle Type: \_\_\_\_\_                      Bodystyle: \_\_\_\_\_

**Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:**

Make(s): \_\_\_\_\_                      Model: \_\_\_\_\_                      Years Involved: \_\_\_\_\_

Production Dates: \_\_\_\_\_    Beginning: \_\_\_\_\_    Ending: \_\_\_\_\_

VIN Range: Beginning: \_\_\_\_\_    Ending: \_\_\_\_\_

Vehicle Type: \_\_\_\_\_                      Bodystyle: \_\_\_\_\_

**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.

The recalled population represents 100% of the recall models manufactured and sold by TYC since 05/28/04 to 11/27/06.

**II. Identify the Recall Population**

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

**Number of Vehicles**

<u>Model</u>	<u>Year</u>	<u>Potentially Involved</u>
		<u>Quantities Recalled</u>
Honda Accord headlamps RH	2003-2006	7,102
Honda Accord headlamps LH	2003-2006	6,987

**Total Number Potentially Affected by the Recall:** 14,089

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

<u>Part Number</u>	<u>Description</u>	<u>% w/ variance</u>	<u>% non-compliance</u>
20-6361-00	03-06 Accord Headlamps RH	100%	100%
20-6362-00	03-06 Accord Headlamps LH	100%	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 vehicles:**

The recall population was based on total quantity sold since inception (May 28, 2004) until the product was suspended from sales on November 27, 2006. Our internal test data on the Original Equipment also indicated their products with comparable photometric variances. Our engineers had assessed the design extensively. While certain changes were made, they were unable to make significant improvements to photometrics by the limitations in the configurations of the original equipment.

**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.

Upper and lower beams are performing outside the range of standard candela values as defined by FMVSS 108.

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

The initial development review of the Original Equipment headlamps, upon which our headlamp design was based on, also showed inconsistencies and non-compliances. TYC engineers have tried all methods to improve our photometrics without deviating too far from the original design. The final production (and subsequently sold) items, were not fully in compliant with FMVSS 108, but represent an optimized configuration within the constraints of the OE unit that was previously available.

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

While the right hand application (20-6361-00) performed at 90% of the requirements for the upper right quadrant, the illumination may affect visibility of signage to the right of the vehicle. The photometric on the left hand application (20-6362-00) was misaligned to the lower left quadrant. While there's no obstructing glare to oncoming drivers, it reduces the desired level of frontal illumination. The concern of veiling glare was identified on both applications in localized points were identified with marginally brighter illumination, but does not distract the driver.

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

None were identified by our internal photometric engineers.

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

The non-compliance was confirmed in-house, and not components-related.

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

There are none.

#### **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.**

**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.**

In mid-2006, this pair of lamps has been identified to be put under the certification process for CAPA (Certified Auto Parts Association). An extensive internal review and full photometric performance test was conducted on 08/30/2006.

20-6361-00 High Beam: Failed test points (H,3L Min: 15000 Candela, Actual: 10612 Candela)  
(2.5D,12L Min:1000 Candela,Actual: 789 Candela)

20-6361-00 Low Beam: Passed all test points

20-6362-00 High Beam: Failed test point (H,12L Min:1500 Candela, Actual:1242 Candela)

20-6362-00 Low Beam: Passed all test points

After our findings, tooling modification has been initiated, and re-test conducted on 9/15/06. Other than test point 10U-90U, all deficiencies have been corrected. A second round of tooling modifications will be concluded by early February, 2007. We will provide an updated report as soon as we complete another round of photometric performance tests. In the meantime, we have also reviewed the latest OEM lamps acquired in early November 2006 from our local dealership. As expected, our test of the latest OEM lamps on 11/24/06, there were a few points that the OEM lamps deviated from 108 specifications, as indicated on our test reports.

Our photometry performance has comparable deviations with the OE, but they do not post any major safety concerns that may require a recall. However, as a responsible Aftermarket lamp manufacturer, we recognize that we no longer can justify selling non-compliant lamps, even when the OEMs are not fully compliant. We scrap our entire current inventory as of 11/28/06, and will not resume their distribution until full compliance to 108 is demonstrated.

## **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.**

Our remedy plan includes issuing a recall notice to all lighting distributors for the return of uninstalled inventory for a full refund. All physical returns for these part numbers will be scrapped. Previous on hand inventory were suspended from sales and scrapped on November 27, 2006.

The remedy for photometry compliance has also been identified. Our engineers are working on revising the lamp's reflector molds to resolve all the inconsistent/ inadequate points as mentioned in OVSC report and our internal findings. The estimated completion time for the mold revision will be early Feb 2007, after which we will conduct internal tests to ensure full compliance before resuming production. A full compliance report will be submitted to the Office of Vehicle Safety Compliance only upon confirmation of product compliance to FMVSS 108.

There will be no visible differences between the recall condition and the remedy items, with the exception to the characteristics in the following section.

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

TYC's production lamps are identified by production lot numbers. They are a series of 8 numerical digits imprinted on the back of the housing to indicate production date and time. We will use this production lot number to identify new productions that fully complies with Federal Standard. All items with lot numbers prior to mold revision are deemed recalled product, lot numbers reflecting the date subsequent to mold revision indicate remedied products.

**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 recall condition will be corrected in production after the mold revision is complete and internal photometric performance tests verified. This is estimated to be in Feb 2007. The recall remedy in the field will not be identical to the production remedy. All field recalled items will be scrapped.

### **VI. Identify the Recall Schedule**

**9. 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.**

<u>Actions:</u>	<u>Completion Dates:</u>
Dispatch recall to all distributors	1/10/07
Genera submits Part 573 to NHTSA	1/10/07
TYC – target mold revision	2/10/07
TYC – target photometric compliance	2/28/07
Genera submits to NHTSA compliance reports	3/4/07
Target product re-release date	3/30/07
Quarterly recall report to NHTSA	Quarterly Reports in 2007 and 2008.

We do not foresee any problems with implementing the recall.

### **VII. Furnish Recall Communications**

**10. 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 refer to the attached recall memo sent to all Genera's distributors on 1/10/07.

**Note that these documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.**

1. <sup>1</sup>Each manufacturer must furnish a report, to the Associate Administrator for Safety Assurance, for each defect or noncompliance condition which relates to motor vehicle safety.

January 10, 2007

**Subject: Aftermarket Lamp Recall Notice (20-6361/2-00)**

Dear Valued Customer,

We have identified that TYC items 20-6361-00 and 20-6362-00 (03-06 Honda Accord Head Lamp) exhibit photometric performance variances that warrant a product recall. Please immediately discontinue selling these products and contact your Genera Distribution Center for an RGA number to facilitate your return. You will be reimbursed for all return transportation charges and be credited for 100% value of the merchandise.

We sincerely apologize for any inconvenience this may have caused, and will contact you again once these applications have been updated and are available for purchase.

Recalled Items:

<u>TYC #</u>	<u>Partslink #</u>	<u>Description</u>
20-6361-00	HO2503120	03-06 Honda Accord Head Lamp, RH
20-6362-00	HO2502120	03-06 Honda Accord Head Lamp, LH

**Please Return All Inventory To Your  
Genera Distribution Center**

Thank you for your cooperation and patience in this matter. Should you have any questions or concerns, please feel free to contact your local Branch Representative for more information.