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

On <u>October 22nd</u>, 2007, <u>TYC</u> [MFR] decided that (a defect which relates to motor vehicle safety) (a noncompliance with Federal Motor Vehicle Safety Standard No. <u>108</u>) exits in the motor vehicles listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 <u>Defect and Noncompliance Reports</u>.

Date this report was prepared: <u>10/22/07</u>

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 <u>mailing address</u> 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.

Jackson Kwok, VP Business Development

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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): <u>Nissan</u>	Model: <u>Altima</u>	Years I	nvolved: <u>2005-2006</u>	
Production Dates: <u>All Production Dates</u> Beginning: <u>09/29/06</u> Ending: <u>05/12/07</u>				
VIN Range: Beginning:		_Ending	:	
Vehicle Type: <u>All Types</u>	Bodystyle:	Equippe	d with halogen type head lamp	
Descriptive information which characterizes/distinguishes the recalled vehicles from those model vehicles not included in the recall:				
Make(s):	Model:		Years Involved:	
Production Dates:	Begin	ning:	Ending:	
VIN Range: Beginning:		Ending	B:	
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:	Begin	nning:	Ending:	
VIN Range: Beginning:	·····	Endin	g:	
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:	Begi	nning:	Ending:	
VIN Range: Beginning:		Endin	g:	
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 respective inventory 'produced' 09/29/06 through 05/12/07 ('received' by Genera between 11/01/06 through 05/31/07; total of 4,654 units).

II. Identify the Recall Population

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

Number of Vehicles

Model	Year	Potentially Involved	Quantities Recalled
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Nissan Altima Headlamps LH 2005-2006 4,654 0

Total Number Potentially Affected by the Recall: <u>4,654</u>

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

Part Number	Description	% w/ variance	% non-compliance
20-6644-00	05-06 Altima Headlamp 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:

Photometric testing of 20-6644-00 random production sample from August 25, 2006 indicates product conformance, but subsequent test of May 11, 2007 production batch sample identified non-conformance. DOT test on sample lots produced in September 29, 2006 and April 7, 2007 were both determine non conformance. As such, production dates between September 29 of 2006 and May 11 of 2007 are likely suspected of non-conformance. Given the 2 weeks production lead-time and 2 week ocean freighting transportation time, the quantities received by Genera between November 1, 2006 and May 28, 2007 may likely reflect the non-conformance units (total of 4,654 units).

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.

Lower beam is performing outside the range of standard candela (Cd) values as defined by FMVSS 108; in particular the points of (2.0U-4.0L, 0.6D-1.3R and 1.5D-2.0R).

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

The root cause of the non-conformance was attributed to the absence of a 'reference guide' which would enable the consistent positioning of the bulb shield. This tool (reference guide) would provide a consistent reference point regarding the desired position of the bulb shield.

Describe the consequence(s) of the defect or noncompliance condition. While there's no major visual variability, the three points (2.0U-4.0L, 0.6D-1.3R and 1.5D-2.0R) were determined to performance consistently outside of the photometric requirement.

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.

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

Not applicable.

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.

- <u>08/25/06 Photometric testing by TYC on random production lot of August 25, 2006</u> were determined conformance; see pdf attachment '20-6644 G Lot (082506)'
- <u>09/29/06 Production lot sample of September 29, 2006 advised by OVSC nonconformance.</u>
- 04/07/07 Production lot sample of April 7, 2007 advised by OVSC non-conformance.
- <u>05/11/07</u> Photometric testing by TYC on random production lot of May 11, 2007 was determined non-conformance (variance consistency in 2.0U-4.0L, 0.6D-1.3R and 1.5D-2.0R); see pdf attachment '20-6644 NG Lot (051107)'. TYC tentatively discontinued production; identified root cause and implemented corrective and preventive actions.
- <u>07/27/07</u> Genera receives non-conformance concerns/reports from OVSC.
- <u>08/20/07 TYC internal photometric tests of 10 production lot samples indicates product</u> conformance; see pdf attachment '20-6644 (10 units statistics)'

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:

- <u>TYC corrective and preventive action in refining their internal production process (tooling that provide reference of the desired seating position of the bulb shield) to ensure critical components conformity (completed May 12, 2007)</u>
- 2) Genera issued work order to its warehouses for the isolation and quarantine of suspect inventory (implemented on October 17, 2007) and issuing the recall notification (upon concurrence of OVSC officer) to our distributor in identifying and shipping back the respective physical inventory reflecting production dates between September 29 of 2006 and May 11 of 2007. All respective physical recall inventories will be documented then scrapped.

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. Items with lot numbers dated between September 29 of 2006 and May 11 of 2007 will be documented and scrapped.

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.

Production subsequent to May 12, 2007 encompass component (bulb shield) that was confirmed to be compliant. Test sampling from revision and production lot after May 12, 2007 are within conformance.

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.

Actions:	Completion Dates:
Genera submits Part 573 to NHTSA	October 22, 2007
Dispatch recall to all distributors	October 25, 2007
Quarterly recall report to NHTSA	Quarterly Reports - 2007 thru 2009.

We do not foresee any problems with implementing the physical 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.

<u>Please refer to the attached recall memo that is scheduled for dispatch to each of Genera's lighting customer.</u>

<u>Note</u> that these documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.

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