

Noncompliance Report Guide for Equipment
PART 573 Defect and Noncompliance Responsibility and Reports¹

On August 6th, 2007, Spyder Inc. [MFR] decided 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: October 19, 2007 _____

Furnish the manufacturer's identification code for this recall (if applicable): SK3300-61504_

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.

SPYDER INC.

881 S. AZUSA AVE., CITY OF INDUSTRY, CA 91748

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

ANDREW MAK


Telephone Number: 626-934-8884 Fax No.: 626-934-8885

Name and Title of Person who prepared this report.

ANDREW MAK-GENERAL MANAGER

SPYDER INC.

Signed:



¹ Each manufacturer must furnish a report, to the Associate Administrator for Enforcement, for each noncompliance condition.

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) 366-7882.

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:

Make: FORD **Model:** F150

Part Number: PRO-YD-FF15004-HL-BKB, PRO-YD-FF15004-HL-BK, PRO-YD-FF15004-HL-CB, PRO-YD-FF15004-HL-C

Size: 19.54 X 9 X 10.2

Function: Headlamp

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

This headlamp is our own design, different than the original headlamp by Ford. Our lower beam focuses on the projection lighting and there is also an outer Led light ring.

Make: _____ **Model:**

Part Number: _____ **Size:**

Function:

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

Make: _____ **Model:**

Part Number: _____ **Size:**

Function:

Model Years Involved:

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

Make: _____ **Model:**

Part Number: _____ **Size:**

Function:

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

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.

II. Identifying the Recall Population

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

<u>Items</u>	<u>Year</u>	<u>Number of</u>
<u>Model</u>		<u>Potentially</u>
<u>Involved</u>		
PRO-YD-FF15004-HL-BKB	2004-2007	44 SETS
PRO-YD-FF15004-HL-BK	2004-2007	44 SETS
PRO-YD-FF15004-HL-CB	2004-2007	70 SETS
PRO-YD-FF15004-HL-C	2004-2007	80 SETS

Total Number Potentially Affected by the Recall: 238 SETS

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

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:

Spyder has been told by Sonar in Taiwan that 100 percent of the headlamps for this model have lens marking issues. Therefore, Spyder has decided to recall entire 238 sets that were sold.

III. Describe the Noncompliance

5. Describe the noncompliance. The description should address the nature and physical location of the noncompliance. Illustrations should be provided as appropriate.

1) Sonar should mark H1 above the upper beam and the lower beam should mark HB4

2) One of the light source the headlamp used didn't mark SAE/DOT

3) There is an internal misalignment that cause the photometry failures according to

Sonar in Taiwan

Describe the cause(s) of the noncompliance condition.

As per Sonar in Taiwan, the photometry failure was caused by their assembling line. The other two areas were because Sonar simply overlooked during their mass production.

Describe the consequence(s) of the noncompliance condition.

As per Sonar in Taiwan the noncompliance areas should not cause major danger to our customers. The photometry failure might make the headlamps slightly off on the angle, but should not cause many problems.

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

There are no warning signs due to the issues we have on Ford F150

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

Sonar makes all the parts of our headlamps. Sonar is the manufacture of these parts.

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

Hsiu Pan Yang – Vice President of Sonar (Hubert Yang)

IV. Provide the Chronology in Determining the Noncompliance

6. 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.

Spyder Inc. is an importer of Sonar products and did not manufacture this headlamp thus Spyder Inc. do not have any test result of this product.

V. Identify the Remedy

7. A description of the manufacturer's program for remedying the 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.

Spyder Inc. will pay for the purchasing cost of the Ford F150 headlamps as long as our customer provides the invoice of purchasing. Spyder Inc. will contact our customers who have purchased the Ford F150 and issue them a letter regards to the detail of this recall campaign on Ford F150.

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

Spyder will reimburse our customers of the purchasing cost of this product. And will return this product to Sonar in Taiwan.

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

As per Sonar in Taiwan we will notify our customers regard to this matter and repurchase this headlamp from our customers, as it might take Sonar some times to correct all the issues and arrange this model of headlamps into our production line.

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.

This product is made by Sonar in Taiwan and we will import this headlamp again once all the corrections have been made by the factory.

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.

Spyder will send a recall notice to our customers within two weeks and will repurchase this product from our customer.

VII. Furnish Recall Communications

10. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the 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 noncompliance condition on, not just the initial notification. *A DRAFT copy of the notification documents should be submitted to the Office of Defects Investigation by Fax (202-366-7882) for review prior to mailing.*

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