

December 6, 2007

VIA E-MAIL: RMD.ODI@dot.gov

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Daniel C. Smith
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attn: Recall Management Division (NVS-215)
1200 New Jersey Avenue, S.E.
West Building
Washington, DC 20590

Re: Noncompliance Information Report under 49 C.F.R. Part 573

Dear Mr. Smith:

In compliance with the requirements of 49 C.F.R. Part 573, Defect and Noncompliance Responsibility and Reports, please find enclosed an Amended Noncompliance Information Report which we are submitting on behalf of our client, Safelite Fulfillment, Inc. This report contains details of a potential noncompliance with Federal Motor Vehicle Safety Standard 205. Certain replacement glass parts for domestic and foreign vehicles may not break into small pieces as is required for tempered glass. As you know, this report was initially submitted on November 13, 2007 as a Defect Information Report. Through communication with NHTSA, it has been determined that this report should be re-submitted as a Noncompliance Information Report. Safelite Fulfillment has also determined that additional products from the same manufacturer, Hangzhou Glass, may not comply with FMVSS 205. The relevant information is provided in the Report. As described in more detail in the Report, Safelite Fulfillment will conduct a voluntary recall program to replace the potentially non-complying parts.

I am also enclosing a First Recall Letter to Retail Customers and a Second Recall Letter to Retail Customers.

Baker & Hostetler LLP

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Mr. Daniel C. Smith
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Please contact me with any questions, and I look forward to working with the Agency throughout this recall process.

Yours very truly,

 (for Scott E. Damon)

Scott E. Damon
SED/ps
Enclosures

cc: Ms. Kelly Schuler
kelly.schuler@dot.gov

PART 573 Noncompliance Information Report

On November 5, 2007, and November 29, 2007, Safelite Fulfillment, Inc. determined that a potential noncompliance with Federal Motor Vehicle Safety Standard No. 205, Glazing materials, 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 Reports.

Date this report was prepared:

Prepared: November 13, 2007; Amended: December 6, 2007.

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

No identification code has been established.

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.

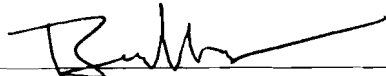
The eighteen part numbers that are the subject of this Recall were sold by Safelite Fulfillment, Inc. The subject part numbers were all supplied by Auto Temp, Inc. of 950 Kent Road, Batavia, Ohio 45103, PH: 513-732-6969, FAX: 513-732-6990, DOT manufacturing code 509. On information and belief, the subject parts were imported into the United States by Wholesale Glass Automotive, 85 Fifth Avenue, Suite 30, Patterson, NJ 07524, PH: 973-345-4693. Contact: Andrew An. Wholesale Glass Automotive is an importer of tempered automotive glass from the manufacturer, Hangzhou Safety Glass Co., Ltd., DOT Code 430. Hangzhou's address is: Industrial Zone, Qiaosi Town, Yuhuan, Hangzhou Zhejiang China 311101. PH: 86-571-86291918, FAX: 86-571-86296199.

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

Scott E. Damon
Counsel for Safelite Fulfillment, Inc.
Baker & Hostetler LLP
2300 SunTrust Center
200 South Orange Avenue
Orlando, FL 32801
Telephone Number: 407-649-4000
Fax No.: 407-841-0168

Name and Title of Person who prepared this report:

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Signed for Scott E. Damon

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 items: Motor Vehicle Replacement Glass

Part Number	Model/Year of Applicable Vehicle	Function
DB08938 YPYHCG	1994-98 Jeep Grand Cherokee	replacement back glass
DB10077 YPYHCG	2002-05 Dodge Ram pickup 1500/2500/3500 - 2 dr. std. cab; 2002-05 Dodge Ram pickup 1500/2500/3500 - 4 dr. crew cab.	replacement back glass
DB10533 YPYHCG	2003-08 Dodge Ram pickup 1500/2500/3500 - 2 dr. std cab; 2003-08 Dodge Ram pickup 1500/2500/3500 - 4 dr. crew cab; 2006-08 Dodge Ram pickup 1500/2500/3500 - 4 dr. ext. crew cab.	replacement back glass
DB10545 GTYHCG	2003-08 Dodge Ram pickup 1500/2500/3500 2 dr. std. cab; 2003-08 Dodge Ram pickup 1500/2500/3500 4 dr. crew cab; 2006-08 Dodge Ram pickup 1500/2500/3500 4 dr. ext. crew cab.	replacement back glass

DB10895 YPYHCG	2002 Ford Explorer 4 dr.	replacement back glass
DD08912 GTYHCG	1998-00 Chrysler Voyager mini van; 1998-00 Chrysler Grand Voyager mini van; 1998-00 Chrysler Town & Country mini van; 1998-00 Dodge Caravan mini van; 1998-00 Dodge Grand Caravan mini van; 1998-00 Plymouth Grand Voyager mini van; 1998-00 Plymouth Voyager mini van.	replacement door glass
DD10745 YPYHCG	2004-07 Chrysler Town & Country mini van; 2004-07 Chrysler Town & Country SWB mini van; 2004-07 Chrysler Voyager mini van; 2004-07 Dodge Caravan mini van; 2004-07 Dodge Grand Caravan mini van.	replacement door glass
DD10746 YPYHCG	2004-07 Chrysler Town & Country mini van; 2004-07 Chrysler Town & Country SWB mini van; 2004-07 Chrysler Voyager mini van; 2004-07 Dodge Caravan mini van; 2004-07 Dodge Grand Caravan mini van.	replacement door glass
DQ10422 YPYHCG	2003-08 Ford Explorer 4 dr.; 2003-08 Mercury Mountaineer 4 dr.	replacement quarter glass
DQ10423 YPYHCG	2003-08 Ford Explorer 4 dr.; 2003-08 Mercury Mountaineer 4 dr.	replacement quarter glass

DQ10751 YPYHCG	2005-07 Chrysler Town & County mini van; 2005-07 Dodge Grand Caravan mini van.	replacement quarter glass
DQ10752 YPYHCG	2005-07 Chrysler Town & County mini van; 2005-07 Dodge Grand Caravan mini van.	replacement quarter glass
DQ10753 YPYHCG	2005-07 Chrysler Town & County mini van; 2005-07 Dodge Grand Caravan mini van.	replacement quarter glass
FQ21176 GTYHCG	2001-05 Honda Civic 2 dr. coupe	replacement quarter glass
FQ21577 GTYHCG	2002-06 Honda CRV 4 dr.	replacement quarter glass
FQ21577 YPYHCG	2002-06 Honda CRV 4 dr.	replacement quarter glass
FQ21578 GTYHCG	2002-06 Honda CRV 4 dr.	replacement quarter glass
DQ09878 YPY	2002-03 Ford Explorer 4 dr.; 2002-03 Mercury Mountaineer 4 dr.	replacement quarter glass

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

The particular items to be recalled are referred to as replacement glass for certain foreign and domestic motor vehicles. The recall will include all parts purchased by Safelite and manufactured by Hangzhou Safety Glass Co., Ltd., identification code DOT 430, for the eighteen identified part numbers regardless of the date of manufacture.

Identify the approximate percentage of the production of all the recalled models between the inclusive dates of manufacture provided above, that the recalled model population represents.

The recall will encompass 100% of the eighteen part numbers that make up the glass products purchased by Safelite and manufactured by Hangzhou Safety Glass Co., Ltd., identified by DOT 430 regardless of year of manufacture.

II. Identifying the Recall Population

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

Safelite purchased a total of 2,737 parts from Auto Temp Inc., as more fully itemized below:

<u>Model</u>	<u>Year</u>	<u>Number of Items Potentially Involved</u>
DOT 430: DB08938 YPYHCG	All years	40
DOT 430: DB10077 YPYHCG	All years	511
DOT 430: DB10533 YPYHCG	All years	119
DOT 430: DB10545 GTYHCG	All years	66
DOT 430: DB10895 YPYHCG	All years	352
DOT 430: DD08912 GTYHCG	All years	19
DOT 430: DD10745 YPYHCG	All years	347
DOT 430: DD10746 YPYHCG	All years	494
DOT 430: DQ09878 YPY	All years	26
DOT 430: DQ10422 YPYHCG	All years	112
DOT 430: DQ10423 YPYHCG	All years	100
DOT 430: DQ10751 YPYHCG	All years	68
DOT 430: DQ10752 YPYHCG	All years	75
DOT 430: DQ10753 YPYHCG	All years	308
DOT 430: FQ21176 GTYHCG	All years	61
DOT 430: FQ21577 GTYHCG	All years	2
DOT 430: FQ21577 YPYHCG	All years	22
DOT 430: FQ21578 GTYHCG	All years	15

Total Number Potentially Affected by the Recall: 2,737

Of the 2,737 parts, 1,080 were destroyed or quarantined by Safelite. The remaining 1,657 parts represent the estimated recall population.

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

As set forth above, of the estimated 2,737 parts, 1,080 were destroyed or quarantined, resulting in an estimated recall population of 1,657.

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:

On November 5, 2007, a Safelite vehicle glass technician observed that an inadvertently broken back glass, Part No. DB10077 YPY (DOT 430), broke into larger pieces than would be expected for tempered glass. Thereafter, the technician notified Safelite's Quality Coordinator who then immediately contacted Auto Temp, Inc., Safelite's supplier of the DOT 430 DB10077 YPY back glass, and informed it of the potential noncompliance. Three DOT 430 back glass products, including part number DB10077 YPY, that differed in color and other non-structural component(s) (e.g. heating apparatus) were initially identified as having the potential noncompliance. Out of an abundance of caution, Safelite promptly quarantined then destroyed all three of such DOT 430 part numbers, regardless of date of manufacture, throughout its entire US operations.

Because Safelite purchases other DOT 430 parts (58 total distinct products) from its supplier, Auto Temp, Inc., it was decided that testing needed to be performed on *all* other DOT 430 products supplied to Safelite by Auto Temp, Inc. All DOT 430 products supplied to Safelite were subsequently tested to determine compliance with FMVSS No. 205, S5.2 (SAE Z26.1-1996). Eighteen glass products were determined to be out of specification. Safelite has destroyed or quarantined all noncompliant DOT 430 replacement glass parts in Safelite's inventory.

The first products bearing the identification DOT 430 glass for the subject part numbers were received by Safelite in November, 2006. As set forth above, regardless of the date of manufacture, all DOT 430 parts determined to be noncompliant are included in the recall population.

Of the estimated recall population of 1,657 parts, Safelite either installed the part in a motor vehicle as part of its fulfillment operations, or sold the parts to wholesale customers. Safelite's records will allow for the identification of the

retail and wholesale customers who may have received the parts in question for remedy purposes.

Based upon the events and chronology provided, Safelite has determined that the eighteen part numbers manufactured by Hangzhou Safety Glass bearing the identification DOT 430 pose a potential safety concern.

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.

For the eighteen identified part numbers, the noncompliance is such that the replacement glass does not break into small pieces as expected for tempered glass and as required under the fracture test requirements of FMVSS No. 205, S5.2.

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

The cause may be an error in the proper technique to manufacture tempered glass.

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

The consequence of the noncompliance is that the glass products, if broken, may not break into the desired small pieces. The breakage of the glass products in larger pieces may present a safety risk to the occupants of the vehicle which contain the glass.

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

There is not any apparent warning which would be expected for the glass failing to break in the proper manner expected for tempered glass.

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

All eighteen DOT 430 replacement glass products were purchased by Safelite from its supplier, Auto Temp, Inc. of 950 Kent Road, Batavia, Ohio 45103, PH: 513-732-6969, FAX: 513-732-6990. On information and belief, Auto Temp, Inc. purchased the eighteen DOT 430 part numbers from Wholesale Glass Automotive, 85 Fifth Avenue, Suite 30, Patterson, NJ 07524; PH: 973-345-4693. Contact: Andrew An. Wholesale Glass Automotive imports the DOT 430 parts DB10077 YPY, DB10533 YPY, DB10545 GTY from Hangzhou Safety Glass Co., Ltd., DOT code 430. Hangzhou's address is: Industrial Zone, Qiaosi Town, Yuhan, Hangzhou Zhejiang China 311101. PH: 86-571-86291918; FAX: 86-571-86296199.

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

The Vice President of Manufacturing of Auto Temp, Inc. is Matt Fassler: 950 Kent Road, Batavia, Ohio 45103. PH: 513-732-6969. FAX: 513-732-6990. Email: mfassler@autotempinc.com. www.autotempinc.com. Auto Temp, Inc. is Safelite's direct supplier of the parts in question.

Wholesale Glass Automotive, 85 Fifth Avenue, Suite 30, Patterson, NJ 07524; PH: 973-345-4693. Contact: Andrew An. Wholesale Glass Automotive is believed to import the recalled parts from Hangzhou Safety Glass Co., Ltd., DOT code 430. Hangzhou's address is: Industrial Zone, Qiaosi Town, Yuhang, Hangzhou Zhejiang China 311101. PH: 86-571-86291918; FAX: 86-571-86296199. On information and belief, Wholesale Glass Automotive is Auto Temp, Inc.'s direct supplier. Hangzhou Safety Glass Co., Ltd. is the manufacturer and is believed to export the parts in question to Wholesale Glass Automotive.

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.

Not applicable.

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.

On November 5, 2007, a Safelite technician observed that an inadvertently broken back glass, Part No. DB10077 YPY (DOT 430), broke into larger pieces than would be expected for tempered glass. Thereafter, the technician notified Safelite's Quality Coordinator who then immediately contacted Auto Temp, Inc., Safelite's supplier of the DOT 430 DB10077 YPY back glass, and informed it of the potential noncompliance. Three DOT 430 back glass products, including part number DB10077 YPY, that differed in color and other non-structural component(s) (e.g. heating apparatus) were initially identified as having the potential noncompliance. Out of an abundance of caution, Safelite promptly quarantined then destroyed all three of such DOT 430 part numbers, regardless of date of manufacture, throughout its entire US operations.

Because Safelite purchases other DOT 430 parts (58 total distinct products) from its supplier, Auto Temp, Inc., it was decided that testing needed to be performed on *all* other DOT 430 products purchased by Safelite from Auto Temp Inc. Auto Temp, Inc. performed some initial testing described in FMVSS No. 205, S5.2 (SAE Z26.1-1996) and reported that three DOT 430 back glass products, DB10077 YPY, DB10533 YPY and DB10545 GTY, appeared to out of specification.

Between November 5, 2007 and December 6, 2007, Safelite also conducted its own testing in accordance with FMVSS No. 205, S5.2 (SAE Z26.1-1996) to evaluate all DOT 430 glass products manufactured by Hangzhou Safety Glass and ultimately purchased by Safelite from Auto Temp, Inc. Results over 4.25 grams were considered to be outside the standard and therefore were determined to be noncompliant. Safelite determined that a total of eighteen DOT 430 replacement glass products were noncompliant.

The first products bearing the identification DOT 430 glass for the subject part numbers were received by Safelite in November, 2006. As set forth above, regardless of the date of manufacture, all eighteen DOT 430 parts identified as having the potential noncompliance are included in the recall population.

Of the estimated recall population of 1,657 parts, Safelite either installed the part in a motor vehicle as part of its fulfillment operations or sold the parts to wholesale customers. Safelite's records will allow it to identify which retail and wholesale customers received the parts in question for remedy purposes.

Based upon the events and chronology provided, Safelite has determined that only replacement glass manufactured by Hangzhou Safety Glass bearing the identification DOT 430 with the eighteen designated part numbers pose a potential safety concern.

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.

Safelite will remove and replace all replacement glass originally manufactured by Hangzhou Safety Glass Co., Ltd. bearing the identification DOT 430 for the above eighteen part numbers installed by Safelite in a consumer's vehicle at no charge. Safelite has destroyed or quarantined all inventory of the parts in question to ensure that no product which may contain the noncompliance will be sold or used. The remedy will cause the glass which may not break as expected for tempered glass to be replaced by properly tempered glass.

It is not expected that any parties who have acquired the potentially recalled parts will have yet incurred expenses to remedy or replace such parts.

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

The distinguishing characteristics of the replacement products will be the manner in which the replacement product glass breaks in the event of an accident or other cause for breakage. The replacement glass will conform to specifications for tempered glass to provide the safety factor associated with tempered glass.

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.

Neither Safelite nor Auto Temp, Inc. manufactured the parts subject to this recall. Such parts will be replaced for consumers who have obtained the parts. All remaining parts have been destroyed or quarantined. Safelite has discontinued purchase of any of the above eighteen part numbers originally manufactured by Hangzhou Safety Glass bearing identification DOT 430.

VI. Identify the Recall Schedule

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.

In order to comply with the National Highway Traffic Safety Administration regulations and the Code of Federal Regulations regarding notification to other manufacturers, dealers, retailers and purchasers, Safelite will provide to the Office of Defects Investigation its proposed communications five days in advance of the service of any communications. On or about December 6, 2007, Safelite will provide to the Office of Defects Investigation its proposed First Notification to Retail Customers and proposed Second Notification to Retail Customers. Following review by the Office of Defect Investigation, Safelite will begin to serve notification on or about December 13, 2007. Safelite anticipates completion of notification by December 20, 2007.

VII. Furnish Recall Communications

9. **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.

Safelite has not yet sent any communications or notices to more than one manufacturer, distributor or purchaser related to the noncompliance.