

# PPD

Polymer Process Development, L.L.C.

**08E-020**  
**(4 pages)**

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Phone: 586-464-6400



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March 4, 2008

SENT BY FAX 202-366-7882 AND CERTIFIED U.S. MAIL

Mr. Daniel C. Smith  
Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, S.E.  
NVS-200, Room W45-306  
Washington, D.C. 20590

**Re: Part 573 Noncompliance Information Report**

Dear Mr. Smith

Pursuant to the requirements of 49 C.F.R. Part 573 this letter advises you of a noncompliance with federal motor vehicle safety standards in certain motor vehicle replacement equipment manufactured by Polymer Process Development, L.L.C. (PPD). Specifically, PPD submits this report regarding certain pieces of automotive replacement glass which have been determined not to comply with 49 C.F.R. § 571.205, S5.2.

**Manufacturer's Name**

The subject replacement glass was assembled and processed by:

Polymer Process Development, LLC  
24201 Capital Boulevard  
Clinton Township, Michigan 48036

The subject replacement glass was imported to the U.S. by:

Wholesale Glass Automotive, Inc.  
85 Fifth Avenue, Suite 30  
Paterson, NJ 07524

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The subject replacement glass is marked with DOT Code 430 or DOT Code 628, and on information and belief, the prime glazing manufacturers were:

Hangzhou Safety Glass Co., Ltd. (DOT 430)  
Industrial Zone, Qiaosi Town  
Yuhan, Hangzhou, Zhejiang, CHINA 311101

-OR-

Hebei Tonyyong Glass Industrial Co., Ltd. (DOT 628)  
88 Shizheng Road  
Shijiazhuang City, Hebei Province, CHINA 050041

#### **Identification of Motor Vehicle Equipment**

The subject motor vehicle replacement equipment is certain replacement back-lights with a part number of FB20415ZPY that are marked with prime manufacturer's codes of DOT 430 or DOT 628, and which were imported into the U.S. in two shipments, received at PPD on October 10, 2006 (DOT 628 Product) and on October 17, 2007 (DOT 430 Product) (the "subject glass"). These two shipments are the only shipments of DOT 430 or DOT 628 glass that have been used by PPD to produce automotive glazing, and all glass products made with glass from those two shipments will be the subject of the recall described below.

#### **Total Number of Units Potentially Containing the Noncompliance**

There are 931 units of subject glass. A total of 440 units were sold in October, 2006 (DOT Code 628), and 491 units were sold in October and November, 2007 (DOT Code 430). To date, approximately 508 units have been quarantined at our customer's facilities and have not installed into vehicles.

#### **Percentage of Units Estimated to Actually Contain the Noncompliance**

It is estimated that 100% of the units described above contain the noncompliance.

#### **Description of Noncompliance**

PPD has determined that the subject glass may not comply with 49 C.F.R. § 571.205. Units of subject glass were tested and ultimately found not to comply with ANSI/SAE z26.1 as required by 49 C.F.R. § 571.205 S5.2. These tests indicate that the subject glass may not have been sufficiently tempered by the prime glazing manufacturer to insure that all fracture particles generated by the

fracture test are smaller than the required maximum particle size of 4.3 grams (0.15 oz.) per particle. This condition does not make the glass more susceptible to initial fracture or failure; it only affects the particle size of glass that is fractured by forces that would cause fracture regardless of the condition.

### **Test Results**

Preliminary field testing of two products to ANSI/SAE Z26.1 were conducted on January 31, 2008. Upon return of an adequate population of subject glass, tests were run on subject glass on February 21, 2008, these results are attached. Upon compilation of these tests results, report dated February 25, 2008, the results were reviewed by PPD, analyzed and compared with additional blue-print results of fracture tests. Based on this review and analysis, PPD concluded on February 28, 2008 that a noncompliance existed in all the subject glass shipments.

### **Remedy Program**

A voluntary recall campaign for the subject glass described above will be initiated immediately. The recall will be conducted to replace all potentially affected units of replacement glass.

### **Copies of Communications with Dealers or Purchasers**

Dealers and distributors will be notified of the recall campaign in March, 2008. A copy of all communications will be provided when available.

### **Manufacturer's Campaign Identification Number**

The PPD Recall Campaign Number will be identical to the campaign number assigned by NHTSA

Should you have any questions, please do not hesitate to contact myself at 586-464-6400, Extension 24.

Sincerely,



Perry E. Giese  
President  
Polymer Process Development, L.L.C.

## Temper Tests on FB20415 ZPYTYG Backlites

Plate #	AS #	M #	Dot #	Part#		Largest Particle Wt. In Grams	Pass / Fail
1	AS-2	M540	Dot 628	FB20415	ZPYTYG	17.67	Fail
2	AS-2	M540	Dot 628	FB20415	ZPYTYG	11.91	Fail
3	AS-2	M540	Dot 628	FB20415	ZPYTYG	11.23	Fail
4	AS-2	M540	Dot 628	FB20415	ZPYTYG	7.08	Fail
5	AS-2	M540	Dot 628	FB20415	ZPYTYG	8.25	Fail
6	AS-2	M540	Dot 628	FB20415	ZPYTYG	8.30	Fail
7	AS-2	M540	Dot 628	FB20415	ZPYTYG	12.83	Fail
8	AS-2	M540	Dot 628	FB20415	ZPYTYG	9.95	Fail
9	AS-2	M540	Dot 628	FB20415	ZPYTYG	9.10	Fail
10	AS-2	M540	Dot 628	FB20415	ZPYTYG	12.15	Fail
13	AS-2	M540	Dot 430	FB20415	ZPYTYG	17.91	Fail
14	AS-2	M540	Dot 430	FB20415	ZPYTYG	15.25	Fail
15	AS-2	M540	Dot 430	FB20415	ZPYTYG	13.57	Fail
16	AS-2	M540	Dot 430	FB20415	ZPYTYG	8.50	Fail
17	AS-2	M540	Dot 430	FB20415	ZPYTYG	19.36	Fail
18	AS-2	M540	Dot 430	FB20415	ZPYTYG	15.10	Fail
19	AS-2	M540	Dot 430	FB20415	ZPYTYG	16.85	Fail
20	AS-2	M540	Dot 430	FB20415	ZPYTYG	16.41	Fail
21	AS-2	M540	Dot 430	FB20415	ZPYTYG	19.64	Fail
22	AS-2	M540	Dot 430	FB20415	ZPYTYG	9.26	Fail

Test Date: February 21, 2008

Test Technician: Robert Brisley

*Robert Brisley*

Test Method: ANSI/SAE Z26.1

Report Date: February 25, 2008

A Blue Print of break patterns are available on select glass only,  
not all parts were Blue Printed

Break Patterns were very typical sample to sample and Dot Code to Dot Code.

Maximum allowable Partical Weight: 4.3 grams

Each failure had at least one failure, most had 4-10 particals over weight limits