RECEIVED
2008 AUGUST 8
OFFICE OF DEFECTS INVESTIGATION
RECALL MGMT DIV.

Noncompliance Report Guide for Equipment

PART 573 Defect and Noncompliance Responsibility and Reports[1]

On 30st July 2008, EAGLE EYES **[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：2nd Aug 2008

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

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.

Manufacturer Name：Eagle Eyes Traffic Industrial Co., LTD.
Manufacturer Mailing Address：No.27 Lane 764 Chung Shan N. Rd. Yung Kang City, Tainan Hsien, Taiwan R.O.C
Designated Agent：Ali Kamarei
Designated Agent Mailing Address：Esq. 280 Colorado Ave Palo Alto CA 94301

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

Corporate Official：Mr. Chas Lee, Sales Manager of Eagle Eyes Traffic Industrial Co., LTD.
Telephone No.：+886-6-233-6618 ext 200
Cell No.：+886-932-716-288
Fax No.：+886-6-233-1522
Email：chas@eagleeyes.com.tw

Name and title of the person who prepared this report.

Mr. Chi-Shu Huang, Sales Assistant Manager

Signature：

Chi Shu Huang

---

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 : EAGLE EYES

Model : Dodge Caravan '01~'07

Part Number : CS090-B001L/R

Size : N/A

Function : Original Equipment Replacement Headlamp

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.

N/A

II. Identifying the Recall Population

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

Model	Year	Number of Items Potentially Involved
CS090-B001L	2004~2008	11,500
CS090-B001R	2004~2008	11,567

Total Number Potentially Affected by the Recall : 11,534 pair/set

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

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 :

Recalled Models Selection :

Based on the NHTSA notification sent by Jeffrey Giuseppe on 2008/06/05 and the following inspection within Eagle Eyes, we determined that the models listed in the mail do not meet FMVSS No.108 standard for the lower beam photometry.

Beginning and final dates :

We determined to recall all manufactured items for the selected recalled model, therefore, we will recall delivered recalled items from 2004 to date.

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.
Models listed do not meet the requirement in FMVSS No. 108 paragraphs S7.5 (b) , S7.5 (c) though S7.5 (e), and S7.8.5.3 (e)(1) for the photometric performance of the lower beam on these lamps.

Describe the cause(s) of the noncompliance condition.
CS090-B001L/R：Poor design in the reflector

Describe the consequence(s) of the noncompliance condition.
CS090-B001L/R：Lower beam photometry failure.

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

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

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

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.
Test results：
The test conducted by NHTSA's Office of Vehicle Safety Compliance concerning Eagle Eyes' model CS090-B001L and CS090-B001R determined that there is lower beam photometry failure. A failure notification was sent to EAGLE EYES by NHTSA on 2008/06/05.
Other data：
To date, no consumer complaints associated with this light has been received, nor have there been any accidents、injuries、fatalities or warranty claims made to us as a result of this non-compliance.

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.

Remedy Program：

Eagle Eyes will implement an immediate recall to all customers who purchased the parts listed after receiving the recall authorization from NHTSA. For the recalled parts, we will swap with newly produced parts that have passed ITL photometry test. Return of noncompliant parts and delivery of the newly produced parts will be free of charge to all customers.

8. Clearly describe the differences between the recall condition and the remedy.

Recall condition：

Eagle Eyes will implement an immediate recall to all customers who purchased the parts listed after receiving the recall authorization from NHTSA.

Remedy：

For the recalled parts, we will swap with newly produced parts that have passed ITL photometry test. Return of noncompliant parts and delivery of the newly produced parts will be free of charge to all customers.

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

Recalled Parts：

NHTSA issued lower beam photometry failure notification.

Remedy Parts：

Sample after mold modification passed ITL photometry test on 2008/07/22.

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 reflector of the mold was modified in the late June after we determined the noncompliance of CS090-B001R/L. Then a new sample was sent to ITL for photometry test. On 2008/07/22, ITL issued a notification saying that the sample passed related photometry test. Therefore, the correction in production is effective since then.

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.

First, we will start the recall and swap process immediately once we obtain the proper authorization. Second, we will notify our customers and provide them with an official letter to which proper instructions will be provided and any assistance they may need.

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.
