



May 9, 2012

BY FACSIMILE - (202) 366-3820

U.S. Department of Transportation
Attn: Ms. Sarah Sorg
NHTSA Office of Chief Counsel, Room W41-326
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Re: Model Year (MY) 2008 ZAP Xebra, Recall Numbers 09V -177 and 09V -385

Dear Ms. Sorg:

This letter responds to the U.S. Department of Transportation's ("Dot") letter dated May 7, 2012.

As stated in our April 2, 2012 letter, we intended to submit a new Part 573 Report to NHTSA on or before April 30, 2012. Our submission was delayed; however we submitted it on May 7, 2012. A copy of our submission is attached hereto for your reference.

Furthermore, as stated in our April 2, 2012 letter, we intended to send a repaired MY 2008 ZAP Xebra to Karco Engineering ("Karco") no later than April 30, 2012 for retesting and certification. We were delayed in delivering the repaired MY 2008 ZAP Xebra as a result of additional work required when we discovered that the batteries in the vehicle needed to be conditioned. The vehicle's mileage was only 11 miles per charge. Since one of the required tests that Karco will be conducting on the vehicle entails driving the vehicle 250 to 300 miles to retest the stopping distance, and this would have taken a long period of time to complete at 11 miles per charge, we opted to drive the vehicle in order to increase the speed and distance the car is able to achieve per charge. As of today, we have increased the mileage to 17 miles per charge. We have made arrangements to ship the vehicle on Tuesday, May 15, 2012 to Karco and it will be

received at Karco on or about Wednesday May 16, 2012. Karco has advised us that they will begin testing the vehicle promptly on the date of its arrival.

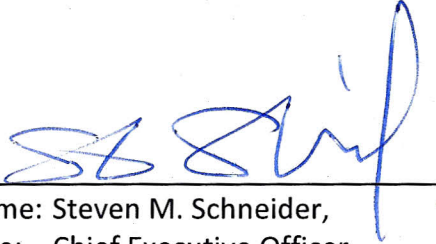
We hope this response fully addresses the DOT's concerns. Please do not hesitate to contact our counsel should you have additional questions or concerns.

Libertas Law Group, Inc.
280 S. Beverly Drive, Suite 204
Beverly Hills, CA 90212
Attn. Mark Abdou
Email: mark@libertaslaw.com
Phone: (310) 359-8742
Fax: (310) 356-1922

Sincerely,

ZAP

a California corporation

By: 

Name: Steven M. Schneider,
Title: Chief Executive Officer

Enclosures

Equipment Safety Recall Quarterly Report Information¹

Required per 49 CFR Part 573.7

Report Date: 05/07//2012 Quarter: 1st QTR 2012

Safety Recall Quarterly Report from 01/01/2012 through 03/31/2012

Manufacturer: QingQi Group Motorcycle CO. Ltd

Report Author: Michael Ringstad Phone: (707) 525-8658 x229

Recall Subject: ZAP XEBRA ALL ELECTRIC MOTORCYCLE

1. NHTSA Safety Recall Campaign Number: 09V177

Also, for completeness, if your company has assigned a code number to this campaign, please provide your code: N/A

2. (a) The date notification to purchasers began: 01/2010

(b) The date notification of purchasers was completed: CONTINUING

3. The Total Number of Items of Equipment Involved: 693

The total number of items involved in the subject campaign (including all items sold or distributed to purchasers, dealers, distributors, and similar entities beyond the immediate control of the manufacturer/importer).

Number of Items Returned from Inventory or Remedied Prior to Sale: 49

Includes (a) the total number of items returned from Manufacturer, Distributor, Dealer or Retailer inventory or (b) otherwise remedied prior to sale to consumers.

4. (a) Total Number Inspected & Remedied: 105

Total number of items which were inspected and/or otherwise repaired or remedied.

(b) Total Number Inspected & NOT REQUIRING REMEDY: 0

Total number of items involved in the recall and inspected, but determined to NOT REQUIRE REMEDIAL or recall repair work.

5. Items Determined to be Unreachable

Total Number Exported: 6

Total Number Stolen: 0

Total Number Scrapped: 17

Total Number Unable to Notify: 45

Total Number Otherwise Unreachable: 59

Describe Other: One vehicle has been successfully completed. We are currently retrofitting the original vehicle that was tested at Karco and failed. This retrofit will be completed by weeks end and will be ready to ship to Karco for retesting. We are currently making the testing dates arrangements now with Karco

¹Any questions please contact Mrs. Kelly Schuler or Ms. Jennifer Timian at (202) 366-5227 or by FAX at (202) 366-7882 or email to rmd.odi@dot.gov.

Equipment Safety Recall Quarterly Report Information¹

Required per 49 CFR Part 573.7

Report Date: 05/07//2012

calendar Quarter: 1st Qtr 2012

Safety Recall Quarterly Report from 01/01/2012 through 03/31/2012

Manufacturer: QingQi Group Motorcycle CO. Ltd

Report Author: Michael Ringstad Phone: (707) 525-8658 x229

Recall Subject: ZAP XEBRA ALL ELECTRIC MOTORCYCLE

1. NHTSA Safety Recall Campaign Number: 09V385

Also, for completeness, if your company has assigned a code number to this campaign, please provide your code: N/A

2. (a) The date notification to purchasers began: 01/2010

(b) The date notification of purchasers was completed: CONTINUING

3. The Total Number of Items of Equipment Involved: 693

The total number of items involved in the subject campaign (including all items sold or distributed to purchasers, dealers, distributors, and similar entities beyond the immediate control of the manufacturer/importer).

Number of Items Returned from Inventory or Remedied Prior to Sale: 49

Includes (a) the total number of items returned from Manufacturer, Distributor, Dealer or Retailer inventory or (b) otherwise remedied prior to sale to consumers.

4. (a) Total Number Inspected & Remedied: 107

Total number of items which were inspected and/or otherwise repaired or remedied.

(b) Total Number Inspected & NOT REQUIRING REMEDY: 0

Total number of items involved in the recall and inspected, but determined to NOT REQUIRE REMEDIAL or recall repair work.

5. Items Determined to be Unreachable

Total Number Exported: 6

Total Number Stolen: 0

Total Number Scrapped: 17

Total Number Unable to Notify: 45

Total Number Otherwise Unreachable: 59

Describe Other: All remedies have been completed with this recall

¹Any questions please contact Mrs. Kelly Schuler or Ms. Jennifer Timian at (202) 366-5227 or by FAX at (202) 366-7882 or email to rmd.odi@dot.gov.