



Aftermarket Services

ZF Services North America, LLC - 777 Hickory Hill Drive
Vernon Hills, IL 60061

Claude Harris,
Acting Associate Administrator for
Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division (NVS-
215)
1200 New Jersey Avenue, S.E.

Dept.	Quality
From	Tom McInerney
Phone	847-478-6748
Fax	847-478-6864
E-mail	tom.mcinerney@zf.com
Your Ref.	
Our Ref.	
Date	6/21/11

RE: ZF Services North America, LLC Part 573 Notification to NHTSA

Dear Mr. Harris,

On June 21, 2011, ZF Services North America, LLC has decided that a defect which relates to motor vehicle safety exits in items of motor vehicle spare parts listed below. Therefore, on behalf of ZF Services North America, LLC, 777 Hickory Hill Dr., Vernon Hills, IL 60061, USA, we are submitting this notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573—Defect and Noncompliance Reports:

573.6 (c)(1): Manufacturer's Name of the item of equipment

ZF Services North America, LLC, 777 Hickory Hill Dr., Vernon Hills, IL 60061, USA

Contact person:

Tom McInerney,
Quality & Environmental Manager
ZF Services North America, LLC
777 Hickory Hill Drive
Vernon Hills, IL 60061
Tel: Direct 847-478-6748
1-800-321-0784 ext. 6748
Fax: 847-478-6864



573.6 (c)(2): Identification of Items of Motor Vehicle Equipment

The subject parts are clutch kit assemblies (Part Number K70358) supplied to wholesalers as service parts between September 1, 2010 and March 8, 2011. These service parts are designed for use on model year 2003-2006 Nissan 350Z & Infinity G35 vehicles.

573.6 (c)(3): Total Number of Parts Containing the Defect

There were 199 of the subject kits shipped to wholesalers.

573.6 (c)(4): Percentage of parts estimated to contain the defect

96%

573.6 (c)(5): Description of the Defect

The SX: K70358-01 clutch kit contained a clutch disc with a 255mm O/D and a cover designed to accept only a 250mm O/D disc. An oversized disc could cause the vehicle to move unintentionally on the initial start-up, if the driver does not follow the installation instructions and fails to use the service brakes while the hand brake is not applied. This condition will correct itself after the first start-up and usage of the clutch kit.

573.6 (c)(6) Chronology of all principal events

<u>Date</u>	<u>Event</u>
3/7/2011	First call from customer complaining of no release with K70358-01 install Inventory of K70358-01 put on QC hold
3/8/2011	
3/14/2011	Labor claim customer installs part and no release incident occurs
3/21/2011	Labor claim customer files claim with O'Reilly part store
3/24/2011	O'Reilly DC ships labor claim to ZFSNA
3/29/2011	Labor Claim received by ZFSNA
4/6/2011	Shipped 183 Discs back to CBI for inspection -50 rejected Daikin Design -50 CBI 250 mm discs -83 CBI 255 mm discs -5 kits in-house
4/14/2011	Formal PM review. Finding no safety issue but recommend return of product.
4/18/2011	Inventory of K70358-01 corrected and taken off inventory hold
4/27/2011	Management notified of Labor Claim - Daily meetings begin



- Product testing to identify potential issues begins
- Begin calling customers to have inventory returned
- 6/6-6/16 Additional discussions and analyses of the issues
- 6/16 Send Notification to NHTSA
- 6/17 Receive NHTSA statement that an additional report is required
- 6/17 Prepare paper work for decision to conduct a safety recall
- __6/21/11 Decision made to conduct a safety recall

573.6 (c)(8)(i) Remedy Program:

The phone request for return of product using a returns goods authorization number began on April 27, 2011. The ZF Services written notification will ask ZF's wholesalers to contact their customers and seek return of any subject kits in their inventory. Owners may contact ZF Services at 1-800-321-0784 ext. 6748 for a full refund.

573.6 (c)(8)(ii) Estimated Date for notifications to customers

Between April 27th and 29th, wholesalers were requested by phone to return any of the subject clutch kits in their inventory. We estimate that a written notification will be mailed to our customers during June 2011.

573.6 (c)(10) A Representative copy of all notices bulletins and communications

A copy of the proposed notification is attached.

573.6(c)(11)

ZF Services intends to use the NHTSA Campaign number when it is assigned.

Please feel free to contact me or Stephen Selander, if you have any questions.

Sincerely,

Tom McInerney
Quality & Environmental Manager